

# FY23 (FFY22) ANNUAL ACTION PLAN

FOR THE  
CITY OF NEWTON  
HOUSING AND COMMUNITY DEVELOPMENT PROGRAM  
AND THE  
WESTMETRO HOME CONSORTIUM

JULY 1, 2022 – JUNE 30, 2023

*For submission to the Department of Housing and Urban Development*

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## Table of Contents

### **FY23 Annual Action Plan**

AP-05 Executive Summary	1
PR-05 Lead & Responsible Agencies	12
AP-10 Consultation	13
AP-12 Citizen Participation	26
AP-15 Expected Resources	30
AP-20 Annual Goals and Objectives	37
AP-35 Projects	44
AP-50 Geographic Distribution	47
AP-55 Affordable Housing	48
AP-60 Public Housing	54
AP-65 Homeless and Other Special Needs Activities	59
AP-75 Barriers to Affordable Housing	66
AP-85 Other Actions	73
AP-90 Program Specific Requirements	80

### **Appendix**

Public Comments	94
Citizen Participation Plans	97
Standards of Provision for ESG Assistance	114
FY23 CDBG Budget	133
FY23 ESG Budget	134
FY23 HOME Budget	135
City Council Board Order	136
Certifications	172

# EXECUTIVE SUMMARY

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

### 1. Introduce and summarize the objectives and outcomes identified in the Plan

The City of Newton and WestMetro HOME Consortium are required by the U.S. Department of Housing and Urban Development (HUD) to submit an Annual Action Plan which describes the anticipated uses of Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG) funds received by the City for the fiscal year ahead. The overall goal of these three programs is to develop viable urban communities through the provision of decent housing, a suitable living environment, and the expansion of economic opportunities for low- and moderate-income persons. The recommendations in this Plan are based on a five-year strategy captured in the FY21-FY25 Consolidated Plan, which is the result of data analysis and citizen-driven planning processes.

The City of Newton and the WestMetro HOME Consortium presents the FY23 (FFY22) Annual Action Plan, detailing the allocation of CDBG, HOME, and ESG funds for the period of July 1, 2022 through June 30, 2023.

#### FY23 (FFY22) FEDERAL FUNDING AMOUNTS

Community Development Block Grant (CDBG)	\$1,870,395.00
HOME Investment Partnerships Program (HOME)	\$1,618,338.00
Emergency Solutions Grant (ESG)	\$165,059.00
Total	\$3,653,792.00

#### COMMUNITY DEVELOPMENT BLOCK GRANT

Based on the priorities, needs and goals identified in the FY21-25 Consolidated Plan, the City of Newton has allocated FY23 (FFY22) CDBG funds into four general categories:

- **Affordable Housing** (\$1,165,122 or 60% of CDBG funding), for housing program delivery, housing rehabilitation, and site acquisition and improvements related to the construction of new affordable units for low- and moderate-income households.
- **Human Service** (\$281,000 or 15% of CDBG funding), to provide grants for a total of fourteen human service projects through 14 sub-grantee agencies during FY23.
- **Architectural Access** (\$90,500 or 5% of CDBG funding), to construct two accessible crossings at the three-way intersection of Langley Road, Warren Street and Chase Street.
- **Program Administration** (\$384,079 or 20% of CDBG funding) for the administration and implementation of the CDBG program, including citizen participation and program delivery.

These percentage allocations are a result of a local, community-driven process and not mandated through regulations. However, HUD places a cap on the amount of funds that can be allocated towards Human Services (15%) and Program Administration (20%).

### **Fair Housing**

In addition to the categories mentioned above, Fair Housing will continue to be a focus for the City of Newton and WestMetro HOME Consortium. Continued education around fair housing laws, regulations and enforcement are critical to ensure every person has equal opportunity and access to affordable housing in Newton and throughout the consortium. In FY23, the Consortium will continue to implement the recommended actions in the recently updated [Analysis of Impediments to Fair Housing Choice report \(AI\)](#). In particular, the Consortium will re-release an RFP in FY23 (FFY22) for a consultant to develop and implement a fair housing testing program throughout the 13 HOME communities. The Consortium will also continue its work with MAPC on a parking utilization study of larger multi-family developments built since 2000. The study will assess whether parking requirements meet or exceed demand in new developments. Parking was identified as a potential barrier to affordable housing in the Consortium's AI report.

### **Affordable Housing**

Approximately 60 percent of FY23 CDBG funding (\$1,129,372) plus \$35,750 in estimated FY23 (FFY22) program income, for a total of \$1,165,122, will be allocated towards affordable housing projects identified during the program year. This funding will be used to facilitate:

- The production of new affordable units through site acquisition and improvements,
- The rehabilitation of existing housing units for low- and moderate-income households,
- The preservation of existing affordable units,
- The support of affordable homeownership for low- and moderate-income households, and
- Housing program delivery

### ***Goal: Production of New Affordable Housing Units***

In FY23 (FFY22), CDBG and HOME funding allocated to the City of Newton will continue to be used for a variety of programs and activities to preserve and expand affordable opportunities across the City. In alignment with the FY21-FY25 Consolidated Plan, the Division will seek to fund affordable housing projects near amenities, village centers, and public transportation options to promote housing equality and economic and demographic diversity. The Division will also look to support projects that provide Newton seniors the opportunity to remain in the community as they age, as well as providing opportunities for affordable housing for families. Additionally, the Division will identify projects that expand the stock of accessible and visitable housing.

The 2Life Communities' Golda Meir House Expansion Project, which will convert underutilized, municipal land into affordable housing, is expected to be complete in the Fall of 2023. This



project was awarded FY18, FY20, and FY21 HOME funds to support the new construction of 68 affordable rental units for seniors earning 30 to 99 percent of the Area Median Income (AMI), including nine units for chronically homeless adults with disabilities. To successfully provide permanent supportive housing, 2Life Communities partnered with Hearth, Inc., a nonprofit organization dedicated to the elimination of homelessness among the elderly through prevention, placement, and housing programs. The project financing closed in August 2021 and building construction is in progress.

In addition, the City of Newton will continue to support the development of the Haywood House. The Newton Housing Authority's (NHA) Haywood House project closed on its Low Income Housing Tax Credit financing in the Spring of 2021 and construction commenced soon thereafter. The project, which was awarded FY20 and FY21 Newton CDBG funds, will create 55 new affordable rental units for seniors. The income eligibility will range from 30 to 99 percent of the AMI. Three of the units will be fully accessible and four units will be designated for households that have been homeless or are at risk of homelessness. The project will also include two elevators and community space for supportive services. Project completion is anticipated in the Spring of 2023.

Newton will continue to push forward the redevelopment of the West Newton Armory site on Washington Street into 100% affordable housing. As an awardee of a \$200,000 Housing Choice Grant from the Department of Housing & Community Development (DHCD), the City hired an affordable housing consultant in FY21, to conduct a predevelopment feasibility study on the site. Concurrently, as part of the City's Real Property Reuse process, the West Newton Armory Joint Advisory Planning Group (JAPG) analyzed the property and its redevelopment potential over the course of eleven months. Following the completion of the consultant's study and the JAPG's report, the City Council unanimously recommended to the Mayor that the City purchase the Armory for \$1 from the State for its redevelopment into 100% affordable housing. Newton took ownership of the Armory in the Fall of 2021. Metro West Collaborative Development/Civico Development was selected through an RFP process to partner with the City in the redevelopment of the site. The Metro West/Civico proposal includes 43 units of intergenerational housing affordable to households earning 30 to 60 percent of the AMI. The project is anticipated to be complete in FY25. At a public hearing in April, the Planning and Development Board will vote on the pre-commitment of future years' CDBG and HOME funding, and the City's Inclusionary Zoning funds, to develop the Armory into affordable housing with supportive services.

***Goal: Preservation of Affordable Units***

In FY23, the City will continue to advance the CAN-DO Acquisition and Preservation project through the second phase: property rehabilitation. In FY20 (FFY19), the Newton Housing Authority received funding approval from the City's Planning & Development Board and Community Preservation Committee to acquire and preserve the CAN-DO affordable housing portfolio of 33 units across 12 scattered sites in Newton. The City awarded the Newton Housing Authority (NHA) a total of \$1,200,000 in combined FY19, FY20, and FY21 CDBG funds. The affordability of the housing was placed in jeopardy when CAN-DO disaffiliated from its

management partner, Metro West Collaborative Development, in 2018. In FY21 (FFY20), the Newton Housing Authority officially closed on the acquisition of the portfolio. During the closing process, CAN-DO added an additional property (236 Auburn Street) to the sites to be acquired by the NHA. This increased the acquisition to 36 units across 13 scattered sites, 33 units of which were financed by \$648,648 of CDBG funds. Once the acquisition and debt reduction was complete in FY21, the City began working with the NHA to conduct lead testing and remediation where necessary, prepare project scopes of work, and begin the public procurement process to rehabilitate the properties, prioritizing the units with the greatest infrastructure and safety needs. This rehabilitation will continue throughout FY23.

In addition to the preservation of the CAN-DO portfolio, the City is actively preserving affordable senior housing at 2Life Communities' Coleman House with FY21 CDBG and FY22 HOME funds. These funds are being used to conduct a comprehensive rehabilitation to the building's mechanical systems and infrastructure, as well as accessibility design upgrades to each of the 146 units. The improvements will make the project more efficient and environmentally sustainable for the next several decades, as well as improving the quality of life for senior residents. Construction began in the Summer of 2021 and will continue through FY23.

***Goal: Support Affordable Homeownership***

Newton's CDBG-funded Downpayment/Closing Cost Assistance program supports and expands sustainable homeownership among low- and moderate-income households in Newton. The program will target first-time homebuyers of new and existing deed restricted homeownership units. Three income-eligible homebuyer are expected to be assisted through the CDBG Downpayment/ Closing Cost Assistance program in FY23.

***Goal: Rehabilitation of housing***

Staff will continue to market and administer the Housing Rehabilitation program on a rolling basis, which provides homeowners and qualifying nonprofit organizations with deferred payment loans for repairs and improvements aimed at addressing issues related to health, safety, and building code violations. The Rehabilitation program was expanded to include existing accessory apartments and lodging houses that require repairs to ensure resident health, safety, and building code compliance. Through FY23 and prior year funding, it is anticipated that approximately three units of homeowner housing will be rehabilitated through CDBG assistance. In addition, the City will complete work on 11 of the 36 units acquired by the Newton Housing Authority from CAN-DO's portfolio of rental properties through the Housing Rehabilitation program, utilizing \$551,352 in CDBG funds.

The Housing Authority maintains an additional 57 units of rental housing known as its Management Program (93 units in total, including the 36 CAN-DO units), which are all managed as affordable housing for individuals and families with low incomes. Unlike the NHA's public housing, this portfolio does not receive any subsidy or capital funds from HUD or DHCD. The NHA has used its own operating funds and occasional grants to maintain these properties throughout Newton. In 2019, the NHA commissioned a capital needs assessment of its 57 Management Program rental units at 13 properties. The assessment revealed significant needs

at several properties, totaling \$2,924,044 in recommended Year 1 expenditures alone. The NHA has undertaken some of the recommended improvements but does not have adequate resources to address all of the recommendations in the capital needs assessment. In FY23, the City will work with the NHA to identify CDBG and HOME eligible rehabilitation projects to support the preservation of these important affordable units.

### **Human Services / Public Services**

HUD caps the Human Service allocation at 15 percent of the City's total annual CDBG grant. The FY23 (FFY22) Human Service Request for Proposals (RFP) was released on January 5, 2022. The proposals were evaluated by a review committee comprised of representatives from the Department of Planning and Development and the Department of Health and Human Services, as well as a representative from the Mayor's Office. Subsequently, the review committee consulted with two representatives of the Planning and Development Board. Proposals were ranked on February 16, 2022 based on their alignment and consistency with the City's three priority areas:

- Enrichment and Care for Vulnerable Youth, Ages 0-18
- Stability and Self-Sufficiency for Vulnerable Adults, Ages 19-61
- Promoting Economic Security and Vitality for Older Adults, Ages 62+

In addition to the priority areas, the review committee took into consideration the programs' past performance, target population, and the most pressing needs in the community, which were identified in the FY21-FY25 Consolidated Plan.

The City received 17 proposals, 14 of which will be awarded Human Service grants during the FY23 (FFY22) program year, following the recommendation of the Human Service RFP Review Committee. The selected programs will directly benefit low- to moderate-income Newton residents and will provide a critical network of supports to assist in stabilizing vulnerable individuals and families across the lifespan.

<b>FY23 Human Service Allocation Recommendations</b>		
<b>Agency</b>	<b>Program</b>	<b>FY23 Award</b>
West Suburban YMCA	Childcare Financial Aid Program	\$38,100
Riverside Community Care	Mental Health Services Promoting Self-Sufficiency	\$19,100
Newton Community Development Foundation	Resident Services Program	\$23,800
Newton Housing Authority	Resident Services Program	\$38,100
The Second Step	Community Programs for Adult Survivors of Domestic Violence	\$23,800
Family ACCESS	Social Mobility for Young Families	\$33,300
2Life Communities (formerly JCHE)	CaringChoices and Wellness Nursing for Low-Income Seniors	\$19,000
Newton Dept. of Parks, Recreation, and Culture	Financial Aid for Youth Summer Camp	\$12,300
John M. Barry Boys & Girls Club of Newton	Financial Aid for Teens and Families	\$16,200
The Carroll Center for the Blind	Career and Vocational Rehabilitation Services for the Blind and Visually Impaired	\$14,300
Jewish Family and Children's Services	Stabilization and Recovery Services	\$14,300
Plowshares Education Development Center	Tuition Assistance for Pre-School and School-Age Care	\$9,600
Jewish Big Brothers & Big Sisters (JBBBS)	JBBBS Mentoring Initiatives	\$9,500
Pathway to Possible	Part Time Funding for P2P Clinical Social Worker	\$9,600
<b>TOTAL</b>		<b>\$281,000</b>

*\*The Horace Cousens Fund and the Barry Price Rehabilitation Center received funding in FY22 but are not recommended for funding in FY23. The Barry Price Rehabilitation Center did not submit an application for FY23 funding.*

### **Architectural Access**

Approximately 5 percent of CDBG funding (\$90,500) will be allocated toward the creation of two accessible crossings at the three-way intersection of Langley Road, Warren Street and Chase Street.

In addition, other architectural access projects are underway, including an accessible path connecting Auburndale Cove and Lyons Field, referred to as Phase I of the Marty Sender Path. This project is expected to be completed in the Spring of 2022.

### **Program Administration**

HUD caps the program administration allocation at 20 percent of the City's total annual CDBG grant. As a result, \$374,079 plus an estimated \$11,000 in program income, for a total of \$385,079, will be allocated for program administration.

### **HOME INVESTMENT PARTNERSHIP PROGRAM**

As the lead entity for the WestMetro HOME Consortium, the City receives and administers HOME funds for the City and twelve other member communities of the WestMetro HOME Consortium – the Towns of Bedford, Belmont, Brookline, Concord, Lexington, Natick, Needham, Sudbury, Watertown, and Wayland and the Cities of Framingham and Waltham. The purpose of the HOME Program is to provide funds for a wide range of housing activities, including developing, acquiring and rehabilitating affordable housing or providing direct rental assistance to create affordable housing opportunities for low- and moderate-income people.

The Consortium anticipates receiving a total of \$1,618,338. As part of HUD's official notice of allocation, the HUD Field Office determines the distribution of funds among each member community of the Consortium. Approximately 70 percent of HOME funds will be available for HOME programs and projects, 10 percent will be allocated toward HOME administrative costs, 5 percent will be allocated for operating expenses of certified Community Housing Development Organizations (CHDOs), and another 15 percent will be set-aside for housing activities to be undertaken specifically by certified CHDOs. CHDOs are nonprofit, community-based organizations that are certified by HUD and have the capacity to develop affordable housing within the Consortium.

All 13 WestMetro HOME Consortium communities, including Newton, are subject to a 12-month exclusive use period for their annual entitlement of HOME funds. Any HOME entitlement funds that are not committed by the member community to an eligible HOME project after 12 months from the start of the fiscal year shall be transferred to the Consortium's Competitive Funding Pool for use by any member community through a Request for Proposals (RFP) process.

The Consortium will focus on three goals in FY23:

- **Tenant Based Rental Assistance for Rental Housing (TBRA)**  
Financial support in the form of security deposits and first/last month's rent will be

provided to an estimated 22 income eligible households through Tenant Based Rental Assistance programs in Bedford, Framingham, Natick, Waltham and Wayland. Waltham and Framingham offer full Tenant Based Rental Assistance programs that provide subsidies as vouchers to landlords to supplement the affordable rent paid by income-eligible households.

- **Rehabilitation of Existing Units**

The Towns of Belmont, Brookline, and the City of Waltham will advance several projects to rehabilitate housing authority units in FY23. HOME funds will be used to rehabilitate three rental units at the Brookline Housing Authority’s Morse Apartments. Waltham will commit HOME funds for accessibility improvements at the Beaverbrook Apartments, a 60-unit elderly development owned by the Waltham Housing Authority. Belmont will continue conversations about the redevelopment of Sherman Gardens, a housing authority property. Additionally, as mentioned above, the HOME-funded preservation of 146 units at 2Life Communities’

- **Production of Affordable Units**

Construction of Concord’s multi-phase Junction Village project and Wayland’s River’s Edge Project are in progress. Each development will yield five local HOME-assisted units. Brookline is in the early scoping process for a new construction project with Hebrew Senior Life at 108 Centre Street. Framingham is partnering with its local Housing Authority to redevelop Carlson Crossing, a phased project that will include four HOME units.

## **EMERGENCY SOLUTIONS GRANT AND MCKINNEY-VENTO FUNDS**

The Massachusetts Balance of State (BoS) Continuum of Care (CoC), under the supervision of the Department of Housing and Community Development (DHCD), administers McKinney-Vento funds for the former Brookline-Newton-Waltham-Watertown (BNWW) CoC. The BNWW CoC, previously led by the City of Newton, merged with the BoS CoC in December of 2016. On March 14, 2022, HUD awarded the BoS CoC a total of \$23,903,388 in FFY22 funds, an increase of approximately \$3 million dollars from the prior year. From that total, the BNWW region received \$3,342,642 for four projects across three sub-grantee agencies, including Advocates, Pine Street Inn, and The Second Step.

The City of Newton’s Emergency Solutions Grant (ESG) funds are awarded to local providers through a competitive Request for Proposals (RFP) process, providing shelter operations/services, homelessness prevention, and rapid re-housing services throughout the BNWW region. On December 8, 2021, prior to the release of the RFP, Division staff consulted with former BNWW CoC social service providers and representatives from the four municipalities and BoS CoC to determine FY23 (FFY22) ESG funding priorities across its eligible components, outlined below:

- **Emergency Shelter Services** (\$98,400 or 60%): funds support essential services for individuals and families residing in an emergency shelter; shelter operations and costs such as building maintenance, rent, security, fuel, equipment, and furnishings; and renovations for emergency shelters.
- **Homelessness Prevention** (\$27,060 or 16.5%): funds support the stabilization and potential relocation, including short-term and medium-term rental assistance, security deposit, rent arrears, and moving costs, for individuals and families at immediate risk of homelessness.
- **Rapid Re-housing** (\$26,240 or 16%): funds support homeless individuals and families in moving them out of emergency shelters or places not meant for human habitation into permanent housing.

On January 5, 2022, the FY23 ESG RFP was released alongside the Human Service RFP and proposals were evaluated by a review committee comprised of representatives from the Newton Department of Planning and Development, Department of Health and Human Services, the BoS CoC, and the former BNWW CoC (non-ESG subrecipients). Subsequently, the review committee consulted with two representatives of the Planning and Development Board. Proposals were ranked on February 14, 2022 based on each project's past performance, staff capacity, target population, availability of other funding sources, and the most pressing needs in the region, which were identified in the FY21-25 Consolidated Plan. Furthermore, the review committee took into consideration the continued impacts of the coronavirus pandemic (COVID-19).

The City received seven proposals from five nonprofit agencies, of which, six proposals will receive an ESG grant during the FY23 (FFY22) program year, following the recommendations of the ESG RFP Review Committee.

<b>FY23 ESG Allocation Recommendations</b>		
<b>Agency</b>	<b>Program</b>	<b>FY23 ESG Recommendations</b>
<b>Emergency Shelter Services</b>		
Community Day Center of Waltham	Integrated Day and Seasonal Night Programs	\$38,650.00
REACH Beyond Domestic Violence	Shelter Operations	\$22,140.00
The Second Step	Residential Shelter Program	\$30,195.00
Middlesex Human Service Agency	Individual Shelter Assistance	\$8,050.00
<b>Homelessness Prevention</b>		
Brookline Community Mental Health Center	Homelessness Prevention	\$27,235.00
<b>Rapid Re-housing</b>		
Brookline Community Mental Health Center	Rapid Re-Housing	\$26,410.00
<b>Program Administration</b>		
City of Newton	Administration	\$12,379.00
<b>TOTAL</b>		<b>\$165,059.00</b>

*\*Brookline Community Mental Health Center was the only applicant that requested ESG funding for its Rapid Re-housing projects. The Second Step did not request funding for its Rapid Re-housing projects, as it has done in prior years.*

### **HOME-AMERICAN RESCUE PLAN**

In September of 2021, the WestMetro HOME Consortium was awarded \$5,406,962 through the American Rescue Plan (ARP) Act of 2021. HOME-ARP funds provide individuals or households who are homeless or at risk of homelessness with housing, rental assistance, supportive services, and non-congregate shelter to reduce homelessness and increase housing stability. The City of Newton and the WestMetro HOME Consortium will select a consultant, through an RFP process, to conduct a Needs Assessment and develop a HOME-ARP Allocation Plan. The plan will describe the current regional unmet housing and program delivery needs, the



proposed HOME-ARP activities, and the production goals of affordable rental units. The City is expected to select a consultant by June of 2022.

### **1. Evaluation of past performance**

Following the close of the fiscal year, the City of Newton submits the Consolidated Annual Performance Evaluation Report (CAPER) to HUD on behalf of the City's CDBG and ESG programs, and the WestMetro HOME Consortium's HOME programs. This report describes the expenditures and accomplishments of the prior year, and evaluates the progress the communities made in advancing the priorities identified in that year's Annual Action Plan.

The most recent draft Consolidated Annual Performance and Evaluation Report (CAPER) was posted to the City's website on September 1, 2021. In accordance with the Citizen Participation Plan, the CAPER was presented by Newton staff to the Planning and Development Board at a public hearing. For the FY21 (FFY22) CAPER, this hearing took place before the Planning and Development Board on September 13, 2021. The presentation of the CAPER initiated a 15-day comment period, after which the report was reviewed and certified by the Executive Office and submitted to HUD. The FY21 (FFY20) CAPER was submitted on September 30, 2021. A public notice of the hearing and subsequent comment period was published in all of the Consortium communities' newspapers, and announced in the City's digital Friday Report. The public notice and report was made available on the City's webpage and in the Housing and Community Development Division office ten days in advance of the meeting.

### **2. Summary of Citizen Participation Process and consultation process**

The draft FY23 Annual Action Plan was available for public review on Wednesday April 20, 2022, in advance of the virtual public hearing held by the Planning and Development Board on Monday, May 2, 2022. Detailed instructions for public participation in the meeting via ZOOM were included in the City's public hearing notice. The public comment period began May 2, 2022 and ended Tuesday, June 1, 2022. The draft Plan was also presented to the Zoning and Planning (ZAP) Committee of the Newton City Council on Monday, June 1, 2022.

Please see the appendix to review the Citizen Participation Plan. Please also see the consultation and participation sections of this plan.

### **3. Summary of public comments**

The City received correspondence from The Newton Department of Senior Services during the comment period. Please see the Appendix to review the email and the City's response.

### **4. Summary of comments or views not accepted and the reasons for not accepting them**

All public comments received were accepted.

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

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

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

Agency Role	Name	Department/Agency
Lead Agency	City of Newton, MA	Housing and Community Development Division
CDBG Administrator	City of Newton, MA	Housing and Community Development Division
HOME Administrator	City of Newton, MA	Housing and Community Development Division
ESG Administrator	City of Newton, MA	Housing and Community Development Division

### 2. Introductory Narrative

The Housing and Community Development Division (the Division) of the City of Newton's Department of Planning and Development serves as the lead agency responsible for the preparation and implementation of the Five-Year Consolidated Plan and respective Annual Action Plans. In addition to operating as the lead agency for the city's CDBG and ESG consolidated planning process, the Division also serves as the lead entity for the HOME Investment Partnerships Program (HOME) on behalf of the WestMetro HOME Consortium. The Consortium is comprised of the towns of Bedford, Belmont, Brookline, Concord, Lexington, Natick, Needham, Sudbury, Watertown, and Wayland, and the cities of Framingham, Newton and Waltham.

### 3. Consolidated Plan Public Contact Information

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

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

The City of Newton Housing and Community Development Division (the Division) of the Department of Planning and Development works collaboratively with municipalities, city departments, housing providers and advocates, and planning, human service and homelessness agencies throughout the community and region. These joint efforts seek to address community needs, inform investment decisions and ensure the provision of critical services like mental health care, crisis prevention, youth and elderly programming, childcare, family support, affordable housing and employment opportunities for developmentally disabled persons. The Consolidated Planning process, citizen participation and ongoing coordination with the above-mentioned service providers improves communication, leverages resources, reduces duplication and produces more meaningful projects.

- 2. 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 former BNWW CoC, previously led by the City of Newton, merged with the (BoS) CoC in December of 2016. The BoS CoC, under the supervision of the Massachusetts Department of Housing and Community Development, implements the continuum's homelessness strategy across 90+ member communities, which includes the recent merge of Somerville-Arlington CoC and Lowell CoC. This encompasses the administration of federal and state resources, submission of the Consolidated Application for McKinney-Vento funds, completion of regional needs assessments, and supervision of projects addressing homelessness assistance and prevention.

In FY20 (FFY19), the BoS CoC collaborated with the City of Newton to facilitate a BNWW area needs assessment to receive feedback from local providers, direct care workers, and constituents regarding housing and homeless needs. The initiative will culminate in a report that will complement ongoing planning efforts. A draft of this report is expected to be released in FY22 (FFY21).

HUD awarded the BoS CoC a total of \$23,903,338 in FFY22 CoC funding, an increase of approximately three million dollars from the prior year. From that total, the BNWW region received \$3,342,642 for four projects across three sub-grantee agencies, including Advocates, Pine Street Inn, and The Second Step.

The BoS CoC, in coordination with several agencies from former BNWW CoC, completed the 2022 Point-in-Time Count (PITC) on February 23, 2022. Data from the PITC is expected to be released as late as June of 2022 but may be available earlier.

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

The City coordinates with the BoS CoC concerning projects and activities, performance standards, funding priorities, Coordinated Entry, and policies and procedures for the operation and administration of Homeless Management Information System (HMIS) and ESG. On December 8, 2021, Division staff consulted with the former BNWW CoC local providers and representatives from the BoS CoC and four municipalities to finalize FY23 (FFY22) ESG funding priorities across ESG's eligible components, of which, funding was prioritized for emergency shelter, homelessness prevention, and rapid re-housing. ESG funds were not prioritized for street outreach or HMIS. The Division streamlined planning processes and released the ESG RFP alongside the Human Service RFP. This year's RFPs were available on January 5, 2022 and due February 2, 2022.

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

Division staff and the Consortium communities consulted with relevant city departments, local and regional organizations, and housing and other social service agencies throughout the development of the FY21-25 Consolidated Plan and the FY23 (FFY22) Annual Action Plan; included in this collaboration were the City of Newton Fair Housing Committee, Newton Housing Partnership, the Commission on Disability, the Housing Authority, and the Balance of State Continuum of Care. Division staff also heard feedback from human service provider and homelessness service provider agencies at the Needs Assessment and Strategic Plan events during the development of the FY21-25 Consolidated Plan, which also informed the FY23 Annual Action Plan.

The draft FY23 Annual Action Plan was available for public review on Wednesday April 20, 2022, in advance of the virtual public hearing held by the Planning and Development Board on Monday, May 2, 2022. Detailed instructions for public participation in the meeting via ZOOM were included in the city's public hearing notice. The public is invited to submit comments on the FY23 Annual Action Plan through Thursday, June 1, 2022. The draft Plan will also be presented to the Zoning and Planning (ZAP) Committee of the Newton City Council on Monday, May 23, 2022.

Please see sheet [AP-10: Consultation](#) at the end of this section.

**2. Identify any Agency Types not consulted and provide rationale for not consulting**

Staff attempted to contact and consult with all agencies and individuals involved in providing affordable housing units, supportive services, and infrastructure improvements in the City of Newton and throughout the Consortium. No one was purposefully excluded from contributing or commenting on the Annual Action Plan.

**Describe other local/regional/state/federal planning efforts considered when preparing the Plan priority**

Please see sheet AP-10: Other Plans Considered at the end of this section.

**AP-10: Consultation for the City of Newton and the WestMetro HOME Consortium**

Agencies/Groups/Organization Type	Type of Organization	Type of Organization (If serving multiple purposes)	What Section of the Plan was addressed by consultation?	How was the organization consulted?	What are the anticipated outcomes of the consultation or areas for improved coordination?
<b>BEDFORD</b>					
Bedford Housing Authority	Public Housing Authority	Public Housing Authority	Public Housing Needs	The BHA executive director was contacted directly to confirm ongoing programs and responses to Public Housing items.	Collaboratively develop community-wide housing goals based on community needs for inclusion in the Annual Action Plan.
Bedford Housing Partnership	Other government - Local		Housing Need Assessment	The BHT held a public meeting to review and provide input on the Annual Action Plan submission.	
Bedford Health and Human Services	Other government - Local		Homelessness Strategy	The Town youth and family services community social worker was consulted to provide information regarding social services available to residents experiencing homelessness or at risk for homelessness and/or with other special needs	
Bedford Housing Trust	Other government - Local		Housing Need Assessment	The Trust attended a Consolidated Plan public meeting comprised of Town Departments and committees to offer input relative to community-wide housing needs and strategic plan goals.	
Bedford Housing Trust	Other government - Local		Housing Need Assessment	The BHT attended a Consolidated Plan public meeting comprised of Town Departments and committees to offer input relative to community-wide housing needs and strategic plan goals.	
<b>BELMONT</b>					
Belmont Housing Trust	Other government - Local		Housing Need Assessment	The Trust conducted various public meeting comprised of Town Departments, committees, Town Meeting Members, and interested residents to gather input relative to community-wide housing needs and strategic plan goals.	Collaboratively develop community-wide housing goals based on community needs for inclusion in the Annual Action Plan.
Belmont Housing Authority	Other government - Local		Public Housing Needs		
Belmont Council on Aging	Other government - Local		Housing Need Assessment		
<b>BROOKLINE</b>					
Brookline Age Friendly Committee	Housing	Services-Elderly Persons	Housing Need Assessment	Brookline Planning Department staff met with the Brookline Age Friendly Committee on September 10, 2019 to discuss issues and needs of senior citizens concerning affordable housing, homelessness and public services.	A defined view of the high priority needs that seniors face in the community and an understanding of projects that are most important to their well-being.
Brookline Housing Advisory Board	Housing	Housing	Housing Need Assessment	Staff from the Brookline Planning Department attended the Brookline Housing Advisory Board meeting on October 15, 2019.	The anticipated outcome is a better understanding of the housing needs in Brookline
Brookline Commission on Diversity, Inclusion and Community Relation's Fair Housing Subcommittee	Housing	Services-Persons with Disabilities	Housing Need Assessment	Staff from the Brookline Planning Department met with the Brookline Commission on Diversity, Inclusion and Community Relation's Fair Housing Subcommittee on September 23, 2019 to discuss housing, with a focus on fair housing, and other community development needs.	Information to guide the priorities for the Consolidated Plan and strengthen the Town's strategy toward housing and community development needs.
Brookline Center for Mental Health	Housing	Services-homeless	Housing Need Assessment	Staff from the Brookline Planning Department held a one-on-one meeting with staff members from the Brookline Mental Health Center on August 5, 2019 to discuss homelessness, affordable housing, and social service needs in the Town.	A better understanding of affordable housing, homelessness and social services needs which will help guide the development of the Consolidated Plan.
Brookline Council on Aging	Housing	Services-Elderly Persons	Housing Need Assessment	Staff from the Brookline Planning Department held a one-on-one meeting with the Brookline Council on Aging on September 16, 2019. The focus of the meeting was the community development and housing needs of seniors.	A defined view of the high priority needs that seniors face in the community and an understanding of projects that are most important to their well-being.
Brookline Community Foundation	Housing	Civic Leaders	Housing Need Assessment	Staff from the Brookline Planning Department held a one-on-one meeting with the Brookline Community Foundation on September 5, 2019 to learn more about the Foundation's programs and gain a further understand of town-wide housing and public service needs.	Improved understanding of the housing and community development needs in Brookline; identification of points of collaboration with other organizations in town.
Pine Street Inn	Housing	Services-homeless	Housing Need Assessment	Staff from the Brookline Planning Department held a one-on-one meeting with staff from Pine Street Inn on September 11, 2019 to discuss affordable housing and service needs for individuals who are very low income and for homeless individuals and families.	An understanding of the existing barriers to create SRO units for formerly homeless individuals and how to improve that process; high priority social services for homeless individuals.

Agencies/Groups/Organization Type	Type of Organization	Type of Organization (If serving multiple purposes)	What Section of the Plan was addressed by consultation?	How was the organization consulted?	What are the anticipated outcomes of the consultation or areas for improved coordination?
Brookline Improvement Coalition	Housing	Service-Fair Housing	Housing Need Assessment	Staff from the Brookline Planning Department held a one-on-one meeting with members of the board from the Brookline Improvement Coalition.	Improved understanding of affordable housing needs in the Town.
Center Communities	Housing	Services-Elderly Persons	Housing Need Assessment	Staff from the Brookline Planning Department held a one-on-one meeting with staff from Center Communities, a local senior housing affordable housing developer on September 12, 2019.	Improved understanding of housing issues facing seniors, social services needed for seniors, and infrastructure issues in the Town.
Commission on Disability	Housing	Services-Persons with Disabilities	Housing Need Assessment	Staff from the Department of Planning attended a meeting of the Commission on Disability on September 19, 2019.	Improved understanding of the needs of persons with disabilities and how federal funds and local resources can be utilized to meet these needs.
Town of Brookline Department of Health	Other-Government Agency	Health Services	Lead Paint Based Strategy	Staff from the Brookline Planning Department consulted with the Town of Brookline Department of Health to specifically discuss lead-paint issues in the Town of Brookline and also the housing availability, affordability and the needs of town residents.	Additional information to educate the public, especially landlords and tenants to identify lead paint and understand their rights.
Massachusetts Housing Partnership	Housing	Regional organization	Housing Need Assessment	Staff from the Brookline Planning Department held a one-on-one meeting with a representative from the Massachusetts Housing Partnership on September 19, 2019.	Improved understanding of regional housing and community development needs and strategies for addressing these needs on a local and regional level.
Brookline Housing Authority	Public Housing Authority	Service-Fair Housing	Public Housing Needs	Staff from the Brookline Planning Department held a one-on-one meeting with staff from the Brookline Housing Authority.	Improved understanding of the needs of BHA residents and the short-term and long-term methods to address these needs through public services and investments in BHA construction projects.
Comcast	Major Employer		Other (broadband access)	Staff from the Brookline Planning Department held a one-on-one meeting with a government relations representative from Comcast on October 3, 2019.	Improved understanding of broadband access in Brookline, including the Internet Essential Program for low-income residents. The Town will collaborate with Comcast to share information about this program.
RCN Cable	Major Employer		Other (broadband access)	Staff from the Brookline Planning Department contacted a government relations representative from RCN Cable	Improved understanding of broadband access in Brookline. RCN is the Brookline Housing Authority high-speed internet provider.
<b>CONCORD</b>					
Concord Housing Development Corp.	Community Development Financial Institution		Housing Need Assessment	The CHDC held a public meeting to review and provide input on the Annual Action Plan submission.	The anticipated outcomes of the consultation are improved coordination and the inclusion of the organization's input in the Action Plan.
Concord Housing Authority	Public Housing Authority	Public Housing Authority	Public Housing Needs	The CHA was consulted to confirm ongoing programs and responses to Public Housing items.	
Concord Natural Resources Commission	Other government - local		Affordable Housing	The Conservation Committee reviewed and provide input on the Annual Action Plan submission.	
<b>FRAMINGHAM</b>					
Framingham Housing Authority	Public Housing Authority	Housing	Public Housing Needs	Interviews	Improved coordination and the inclusion of the organization's input in the Annual Action Plan.
Framingham Council on Aging	Services- Elderly Person	Other government- local	Housing Need Assessment	Interviews	
South Middlesex Opportunity Council, Inc.	Services- Housing , Housing, Services- Children- Services- Persons with Disabilities, Services- Victims of Domestic Violence, Services- Homeless	Regional Organization	Public Housing Needs, Homeless Needs- Chronically Homeless, Homeless Needs- Families with Children, Homelessness Needs- Unaccompanied Youth, Homelessness Strategy, Anti-poverty Strategy	Interviews	
Bay Path Elder Services	Services- Elderly Person	Regional Organization	Housing Need Assessment	Interviews	Improved coordination and the inclusion of the organization's input in the Annual Action Plan.
MetroWest Center for Independent Living	Services- Persons with Disabilities	N/A	Housing Need Assessment	Interviews	
Framingham Planning Office	Other government- Local	N/A	Housing Need Assessment	Interviews	
Framingham Veteran's Office	Other government- Local	Services- homeless	Homelessness Needs- Veterans	Interviews	
Wayside Community Programs	Housing	Services- Children	Housing Need Assessment	Interviews	
Advocates	Services- Persons with Disabilities	N/A	Housing Need Assessment	Interviews	
MetroWest Legal Services	Other	Services- homeless	Homelessness Strategy	Interviews	
Framingham Disability Commission	Other government- Local	Services- Persons with Disabilities	Housing Need Assessment	Interviews	
Fair Housing Commission	Other government- Local	Other government- Local	Housing Need Assessment	Interviews	
Framingham Assessing Department	Other government- Local	N/A	Housing Need Assessment	Interviews	

Agencies/Groups/Organization Type	Type of Organization	Type of Organization (If serving multiple purposes)	What Section of the Plan was addressed by consultation?	How was the organization consulted?	What are the anticipated outcomes of the consultation or areas for improved coordination?
Framingham Health Department	Other government- Local	Services- Health	Lead-Based Paint Strategy	Interviews	Improved coordination and the inclusion of the organization's input in the Annual Action Plan.
City of Framingham- DPW	Other Government- Local	N/A	Non-Homeless Special Needs	Interviews	
Framingham Parks and Recreation	Other Government- Local	N/A	Non-Homeless Special Needs	Interviews	
Framingham Conservation Commission	Other Government- Local	N/A	Non-Homeless Special Needs	Interviews	
Framingham Housing Authority	Public Housing Authority	Public Housing Authority	Public Housing needs	Interviews	
Department of Corrections	Other government- State	N/A	Homeless Needs, Homeless Strategy	Interviews	
MetroWest Medical Center	Services- Health	Regional Organization	Homeless Needs, Homeless Strategy	Interviews	
MetroWest Chamber of Commerce	Regional Organization	N/A	Market Analysis	Interviews	
Downtown Framingham Inc.	Neighborhood Organization		Market Analysis	Interviews	
<b>LEXINGTON</b>					
Lexington Housing Partnership	Other government - Local		Housing Need Assessment	The LHP held a public meeting to review and provide input on the Annual Action Plan submission.	The anticipated outcomes of the consultation are improved coordination and the inclusion of the organization's input in the Action Plan.
Lexington Housing Assistance Board (LexHAB)	Other government - Local		Housing Need Assessment	The LexHAB was consulted to discuss an upcoming project.	The anticipated outcomes of the consultation are improved coordination and the inclusion of the organization's input in the Action Plan.
Lexington Housing Authority	Public Housing Authority	Public Housing Authority	Public Housing Needs	The LHA was consulted to confirm ongoing programs and responses to public housing items.	The anticipated outcomes of the consultation are improved coordination and the inclusion of the organization's input in the Action Plan.
<b>NATICK</b>					
Natick Human Service Department	Other government - Local		Housing Need Assessment	Interviews and focus groups	Improved coordination and the inclusion of the organization's input in the Annual Action Plan.
Senior Center	Services - Elderly Persons		Housing Need Assessment		
ADA/504 Coordinator	Services - People with Disabilities		Housing Need Assessment		
Affordable Housing Trust	Housing		Housing Need Assessment		
Family Promise	Housing	Services - homeless	Housing Need Assessment		
Habitat for Humanity	Housing		Housing Need Assessment		
Natick Housing Authority	Public Housing Authority		Housing Need Assessment		
Natick Service Council	Services - employment	Homeless Needs - Families with children	Housing Need Assessment		
Natick Health Department	Other government - Local		Lead-based Paint Strategy		
State Health Dept/ CLPPP	Other government - State		Lead-based Paint Strategy		
MAPC	Regional Organization	Planning organization	Market Analysis; Other (broadband access)		
MBTA	Other government - State		Anti-poverty Strategy		
Natick Housing Authority	Public Housing Authority		Public Housing Needs		
Natick Conservation Commission	Other government - Local		Other (hazard risks)		
Natick Health Service Department	Other government - Local		Homelessness Needs		
Natick Human Service Department	Other government - Local		Homelessness Needs		
Natick Veteran's Agent	Other government - Local		Homelessness Needs - Veterans		
Natick Police Department	Other government - Local		Homeless Needs - Chronically homeless		
Family Promise	Housing	Services-homeless	Homeless Needs - Families with children	Interviews and focus groups	Improved coordination and the inclusion of the organization's input in the Annual Action Plan.
Natick Services Council	Services - employment	Homeless Needs - Families with children	Anti-poverty Strategy		
South Middlesex Opportunity Council	Housing	Services-homeless	Homeless Needs - Chronically homeless		
Leonard Morse Hospital	Health Agency	Major Employer	Homelessness Strategy		
Natick Center Associates	Business Leaders		Anti-poverty Strategy		
Amvets Post 79, Natick, MA	Foundation		Homelessness Needs - Veterans		
VFW Post 1274, Natick, MA	Foundation		Homelessness Needs - Veterans		
<b>NEEDHAM</b>					
Needham Public Health and Human Service Department	Services - Health		Housing Need Assessment	Meetings	Approved ADU bylaw, Small Repair Grant Program and Emergency Rental Assistance Program through greater coordination among Town Departments.
Needham Senior Center	Services - Elderly persons		Housing Need Assessment	Meetings	



Agencies/Groups/Organization Type	Type of Organization	Type of Organization (If serving multiple purposes)	What Section of the Plan was addressed by consultation?	How was the organization consulted?	What are the anticipated outcomes of the consultation or areas for improved coordination?
Needham Housing Authority	Public Housing Authority		Housing Need Assessment and Housing Strategy	Meetings	Improved coordination in exchanging information between the Town and NHA; coordinated work in managing resales of affordable units; provision of funding; technical support for redevelopment and new development activities.
<b>NEWTON</b>					
Citizens for Affordable Housing in Newton Development Organization (CAN-DO)	Housing		Housing Need Assessment	Acting Executive Director attended the Community Needs Assessment Meeting to provide input on the housing needs of low-income individuals and families in Newton and the WestMetro region.	The anticipated outcomes include improved coordination with the organization and the inclusion of its pertinent input in the Consolidated Plan and Annual Action Plan.
Community Day Center of Waltham	Services-homeless		Homeless Needs - Chronically homeless	Community Day Center of Waltham (CDCW) attended the BoS CoC needs assessment meeting and ESG brown bag session, a focus group among housing and social service providers, to express the pressing needs of the homeless population in the Brookline, Newton, Waltham, and Watertown region.	
Economic Mobility Pathways	Services-Employment		Non-Homeless Special Needs	Economic Mobility Pathways (EMPath) attended the human service brown bag session, a focus group comprised of housing and social service providers, to express the pressing needs of the low- to moderate-income individuals and families living in Newton.	
Family ACCESS of Newton	Services-Children		Non-Homeless Special Needs	Family ACCESS attended the community needs assessment meeting and human service brown bag session, a focus group comprised of housing and social service providers, to express the pressing needs of the low- to moderate-income individuals and families living in Newton.	
Horace Cousens Industrial Fund	Services-homeless		Housing Need Assessment	The Horace Cousens Industrial Fund had a one-on-one consultation with Division staff and attended the community needs assessment meeting to express the housing needs of the low- to moderate-income individuals and families living in Newton.	
Jewish Family and Children's Services	Services-Children		Non-Homeless Special Needs	Jewish Family & Children's Services (JF&CS) attended the human service brown bag session, a focus group comprised of housing and social service providers, to express the pressing needs of the low- to moderate-income individuals and families living in Newton.	
John M Barry Boys & Girls Club	Services-Children		Non-Homeless Special Needs	The Boys and Girls Club attended the community needs assessment meeting and human service brown bag session, a focus group comprised of housing and social service providers, to express the pressing needs of the low- to moderate-income individuals and families living in Newton.	
Massachusetts Balance of State Continuum of Care	Other government - State	Housing	Homelessness Strategy	The Balance of State Continuum of Care (BoS CoC) and Division partnered to host needs assessment meetings to gather input among housing and social service providers as it relates to the homeless and at-risk of homeless population. The BoS CoC also attended a one-on-one consultation session with the Division to coordinate with the ESG program.	
Metropolitan Area Planning Council (MAPC)	Planning organization		Housing Need Assessment	Staff will solicit comments from MAPC on the draft Consolidated Plan.	

Agencies/Groups/Organization Type	Type of Organization	Type of Organization (If serving multiple purposes)	What Section of the Plan was addressed by consultation?	How was the organization consulted?	What are the anticipated outcomes of the consultation or areas for improved coordination?
Middlesex Human Service Agency	Services-homeless		Homeless Needs - Chronically homeless	Middlesex Human Service Agency (MHSA) attended the BoS CoC needs assessment meeting and ESG brown bag session, a focus group among housing and social service providers, to express the pressing needs of the homeless population in the Brookline, Newton, Waltham, and Watertown region.	The anticipated outcomes include improved coordination with the organization and the inclusion of its pertinent input in the Consolidated Plan and Annual Action Plan.
Newton Commission on Disability	Services-Persons with Disabilities		Non-Homeless Special Needs	The Commission on Disability (COD) attended a community needs assessment meeting to offer ideas for architectural access projects that the Division can undertake in the next five years. The Division also attended the COD's monthly-scheduled meeting to follow-up on these project ideas and to gather additional information on the needs of individuals with disabilities.	MAPC's feedback will be incorporated in the final draft as appropriate.
Newton Community Development Foundation	Services-Elderly Persons	Services-Children	Non-Homeless Special Needs	Newton Community Development Foundation (NCDF) attended the community needs assessment meeting and human service brown bag session, a focus group comprised of housing and social service providers, to express the pressing needs of the low- to moderate-income individuals and families living in Newton.	The anticipated outcomes include improved coordination with the organization and the inclusion of its pertinent input in the Consolidated Plan and Annual Action Plan.
Newton Department of Health and Human Service	Other government - Local	Services-Health	Non-Homeless Special Needs	The Department of Health and Human Services (HHS) attended a one-on-one consultation meeting with Division staff to discuss housing and social service needs within the Newton community. The HHS is an active member of the Human Service and ESG RFP review committee and works closely with the City's Human Service and ESG subrecipients to refer low- and moderate-income individuals and families for additional resources.	
Newton Department of Public Works	Other government - Local		Non-Homeless Special Needs	The Department of Public Works attended a special focus group comprised of other city departments to offer input about architectural access barriers in the community and the impact on people with disabilities and elderly population.	
Newton Department of Public Buildings	Other government - Local		Non-Homeless Special Needs	The Department of Public Buildings attended a special focus group comprised of other city departments to offer input about architectural access barriers in the community and the impact on people with disabilities and elderly population.	The anticipated outcomes include obtaining pertinent input to strengthen the City's Human Service and ESG programs and to ensure all available resources are made accessible for all low- to moderate-income individuals and families.
Newton Conservation Commission	Other government - Local		Hazard Mitigation	Community Development & Housing Department staff met with Conservation Commission staff to discuss the Climate Change Vulnerability Assessment and Action Plan and the Hazard Mitigation Plan, and the implications the identified hazards have on lower income households.	The anticipated outcomes include improved coordination with the organization and the inclusion of its pertinent input in the Consolidated Plan and Annual Action Plan.
Newton Department of Senior Services	Other government - Local	Services-Elderly Persons	Non-Homeless Special Needs	The Department of Senior Services attended a special needs focus group comprised of other city departments to offer input relative to the growing elderly population living in Newton as well as people with disabilities.	
Newton Fair Housing Committee	Housing	Service-Fair Housing	Housing Need Assessment	Staff presented an overview of the Consolidated Planning process and conducted a needs assessment discussion at a Fair Housing Committee meeting in the Fall 2019. Members of the Committee attended the Community Needs Assessment Meeting to provide their input specifically related to Newton's affordable housing and fair housing needs. Staff attends the monthly committee meetings, where needs of the community are a regular point of discussion.	

Agencies/Groups/Organization Type	Type of Organization	Type of Organization (If serving multiple purposes)	What Section of the Plan was addressed by consultation?	How was the organization consulted?	What are the anticipated outcomes of the consultation or areas for improved coordination?
Newton Housing Authority	Public Housing Authority	Services-Elderly Persons	Housing Need Assessment	The Newton Housing Authority (NHA) attended the community needs assessment meeting and human service brown bag session, a focus group comprised of housing and social service providers, to express the pressing needs of the low- to moderate-income elderly and families living in Newton. The NHA also assisted the Division in completing sections of the FY21-25 Consolidated Plan and the Annual Action Plans.	The anticipated outcomes include improved coordination with the organization and the inclusion of its pertinent input in the Consolidated Plan and Annual Action Plan.
Newton Housing Partnership	Housing		Housing Need Assessment	Staff presented an overview of the Consolidated Planning process at a Newton Housing Partnership meeting in the Fall 2019. Members of the Partnership attended the Community Needs Assessment Meeting to provide their input specifically related to Newton's affordable housing needs. Staff attends the monthly Partnership meetings, where needs of the community are a regular point of discussion.	
Newton Planning and Development Board	Housing		Housing Need Assessment	Staff regularly attends the monthly Planning and Development Board meetings, where needs of the community are a regular point of discussion. The Planning and Development Board held a public hearing for the Annual Action Plan on May 2, 2022.	The anticipated outcomes include continued collaboration to ensure Newton is creating as many affordable housing opportunities as possible.
Metro West Collaborative Development	Housing		Housing Need Assessment	Metro West staff attended the Community Needs Assessment Meeting to provide input on the housing needs of low-income individuals and families in Newton and the WestMetro region.	
Pine Street Inn	Housing	Services-homeless	Homeless Needs - Chronically homeless	Pine Street Inn attended the ESG brown bag session, a focus group among housing and social service providers, to express the pressing needs of the homeless population in the Brookline, Newton, Waltham, and Watertown region.	The anticipated outcomes include improved coordination with the organization and the inclusion of its pertinent input in the Consolidated Plan and Annual Action Plan.
REACH Beyond Domestic Violence	Services-Victims of Domestic Violence		Homeless Needs - Families with children	REACH Beyond Domestic Violence had a one-on-one consultation with Division staff and attended the human service brown bag session, a focus group comprised of housing and social service providers, to express the pressing needs of survivors of domestic violence and their families living in Newton and the surrounding communities.	
Riverside Community Care	Services-Persons with Disabilities		Non-Homeless Special Needs	Riverside Community Care attended a community needs assessment meeting to offer input on the needs of low- to moderate-income individuals and families as they relate to housing, human services, and homelessness.	
The Second Step	Services-Victims of Domestic Violence		Homeless Needs - Families with children	The Second Step had a one-on-one consultation with Division staff and attended the human service brown bag session, a focus group comprised of housing and social service providers, to express the pressing needs of survivors of domestic violence and their families living in Newton and the surrounding communities.	
United Citizens for Housing Affordability in Newton (U-CHAN)	Housing		Housing Need Assessment	Staff met with U-CHAN representatives, who provided their input on the needs of Newton's low-income population, particularly relating to housing. U-CHAN surveyed low-income Newton residents in 2019 and provided staff with survey results to inform the Consolidated Plan Needs Assessment.	
<b>SUDBURY</b>					
Sudbury Housing Trust	Other government - Local		Housing Need Assessment	The SHT held a public meeting to review and provide input on the Annual Action Plan submission.	The anticipated outcomes of the consultation are improved coordination and the inclusion of the organization's input in the Action Plan.
Sudbury Housing Authority	Public Housing Authority	Public Housing Authority	Public Housing Needs	The SHA was consulted to confirm ongoing programs and responses to Public Housing items.	

Agencies/Groups/Organization Type	Type of Organization	Type of Organization (If serving multiple purposes)	What Section of the Plan was addressed by consultation?	How was the organization consulted?	What are the anticipated outcomes of the consultation or areas for improved coordination?
<b>WALTHAM</b>					
Waltham Affordable Housing Trust	Housing	Other Govt. Local	Housing Needs Assessment	Housing Department staff attend quarterly meetings to provide information on emergency housing needs of city residents and data on the number of residents applying for emergency funding to prevent eviction.	A Housing Trust fund allocation to the emergency assistance program to address the needs of the near-homeless.
Waltham Council on Aging	Services - Elderly	Other Govt. Local	Non-homeless special needs	Council on Aging hosts a series of workshops for the elder community on housing resources, including financial housing assistance.	A senior community that is equipped with knowledge about the available financial resources to age in their home.
Waltham Public Schools	Services - Children	Services - Education	Homeless needs-families with children	Through monthly meetings with the Waltham Homeless Coalition, the Waltham High School McKinney Vento Liaison provides information on number of Waltham homeless families, their housing situations, runaways and overall needs of this population.	Homeless children and youth remain enrolled and have an equal opportunity to succeed in school.
Waltham Housing Authority	Housing	Public Housing Authority	Housing Needs Assessment	Series of meetings with the Waltham Housing Authority and the City Housing Department to discuss project scoping accessibility improvements to the Beaverbrook Elderly Housing development.	Allocation of funds for safety and ADA improvements at WHA's Beaverbrook Housing complex.
Community Day Center	Services - Homeless		Homelessness Strategy	Monthly meetings with the Waltham Homeless Coalition and daily interaction through referrals to the HOME TBRA program.	Improved access to mainstream services for homeless individuals and families by providing transportation, food programs, shelters, and conducting street outreach.
The Salvation Army	Services - Homeless		Homelessness Strategy	Targeted discussions and public meetings with CDBG funding recipients.	Strategies to continue serving households in need of emergency assistance despite limitations on homeless prevention funds.
Waltham Partnership for Youth	Services - Education	Non-Homeless Special Needs	Anti-Poverty Strategy	Targeted discussions and public meetings with CDBG funding recipients.	Improved understanding of child poverty rates and housing and nutrition needs associated with families in poverty in the Waltham public school district.
The Waltham YMCA	Services - Youth	Non-Homeless Special Needs	Anti-Poverty Strategy	Targeted discussions and public meetings with CDBG funding recipients.	Improved understanding of the needs of lower income youth in Waltham.
Chesterbrook/Prospect Hill Community Centers	Services - Youth	Non-Homeless Special Needs	Anti-Poverty Strategy	Targeted discussions and public meetings with CDBG funding recipients.	Improved understanding of the needs of lower income youth in Waltham.
City of Waltham Health Department	Other Gvt.-Local	Services Health	Lead based Paint Strategy	Ongoing consults with the Health Department to communicate state reported high lead levels in children under six years old and ongoing code violation notifications to homeowners in the City that can be assisted with the CDBG Housing Rehab Program.	Improved coordination between the Health Department and the Housing Department to better assist residents with rehabilitation loan funds for lead paint abatement and/or rehabilitation funds for health and safety improvements.
WATCH	Community Development Corporation	Services-Homeless	Housing Needs Assessment	Consultations with social worker concerning clients in need	Improved coordination to assist clients with eviction, homelessness, landlord/tenant issues, and access to the appropriate assistance for each household.
City of Waltham Homeless Task Force	Other Govt-Local		Homeless needs-unaccompanied youth	Police in coordination with the Housing Department and the Community Day Center complete the annual Homeless PIT Count.	Accurate data to inform the City's homeless outreach, policies, and programs.
Waltham Committee Inc.	Services-Persons with Disabilities		Non-Homeless-Special needs	Meeting with the Housing Director to discuss improvements to WCI housing and ADA improvements for individuals being served.	Allocation of funding resources to improve group home housing in Waltham for disabled individuals.
Waltham Ad Hoc Committee	Other Government - Local	Other Government Agency	Housing Needs Assessment	Scheduled Public Meetings to discuss housing problems in Waltham	Acknowledging actions taken in the city to address affordable housing. Identifying needs/challenges, identifying possible solutions. To accomplish these goals, the committee: cataloged relevant reports, data and documentation; reviewed the City's existing policies; engaged with housing advocates, City and state officials and subject matter experts; and researched potential improvements to the City's existing policies.

Agencies/Groups/Organization Type	Type of Organization	Type of Organization (If serving multiple purposes)	What Section of the Plan was addressed by consultation?	How was the organization consulted?	What are the anticipated outcomes of the consultation or areas for improved coordination?
<b>WATERTOWN</b>					
Watertown Senior Center	Services - Elderly Persons	Other Government Agency	Housing Need Assessment; Non-homeless special needs	Interview with staff; community workshops	The anticipated outcomes include improved coordination with the organization and the inclusion of its pertinent input in the Consolidated Plan and Annual Action Plan.
Council Subcommittee on Human Resources	Other Government - Local	Other Government Agency	Housing Need Assessment	Meetings	
ADA/504 Coordinator/Commission on Disability	Services - Persons with Disabilities	Other Government Agency	Housing Need Assessment; Market Analysis	Interview with staff; meetings	
Watertown Housing Partnership	Other Govt-Local		Housing Need Assessment	Meetings	
MetroWest Collaborative Development	Housing	Other - CHDO	Housing Need Assessment	Interview with staff; meetings	
Watertown Housing Authority	Public Housing Authority	Public Housing Authority	Public Housing Needs	Interview with staff; meetings	
Wayside Youth and Family Support Network	Services - Children	Services - children; Services-homeless	Housing Need Assessment	Meetings	
Live Well Watertown	Community Organization	Other Government Agency (Health Department)	Housing Need Assessment	Interview with staff	
MAPC	Planning Organization	Other - government	Housing Needs Assessment; Market Analysis	Meetings	
MBTA	Other Government - State	Public Transportation	Other - Transportation Needs	Interview with staff; meetings	Improved public transit opportunities in Watertown and adjacent communities
<b>WAYLAND</b>					
Wayland Housing Trust	Other government - Local		Housing Need Assessment	The WHT is consulted to provide input when new projects are identified and HOME funds are being considered as a funding source.	The anticipated outcomes of the consultation are improved coordination and inclusion of the organization's input in the Action Plan
Wayland Housing Partnership	Other government - Local		Housing Need Assessment	The WHP is consulted to provide input when new projects are identified and HOME funds are being considered as a funding source.	
Wayland Housing Authority	Public Housing Authority	Public Housing Authority	Public Housing Needs	The SHA was consulted to confirm ongoing programs and responses to Public Housing items.	Collaboratively develop community-wide housing goals based on community needs for inclusion in the Annual Action Plan.

**AP-10: Other Contributing Plans Considered by the City of Newton and the WestMetro HOME Consortium**

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
MAPC Metro Boston 2030 Population and Housing Demand Projections	Metropolitan Area Planning Council	The Strategic Plan of the FY21-25 Consolidated Plan, in addition to the FY23 Annual Action Plan, adopts many of the priorities and strategies included in these plans.
2020-2025 WestMetro HOME Consortium Regional Fair Housing Plan	WestMetro HOME Consortium	
Massachusetts State Plan to End Youth Homelessness	Massachusetts Executive Office of Health and Human Services	
Subsidized Housing Inventory	DHCD	
FFY21 Annual Action Plan	DHCD	
Balance of State Continuum of Care Collaborative Application	DHCD	
Balance of State Continuum of Care Point-In-Time Count	DHCD	
Balance of State Continuum of Care Housing Inventory Count	DHCD	
American Community Survey (various datasets)	U.S. Census	
Bedford Housing Study, 2019	Town of Bedford	
Bedford Comprehensive Plan, 2013	Town of Bedford	
Belmont Housing Production Plan	Town of Belmont	
Brookline Comprehensive Plan	Town of Brookline	
2016 Housing Production Plan	Town of Brookline	
Brookline Open Space Plan	Town of Brookline	
Town of Brookline Climate Vulnerability Assessment and Action Plan	Metropolitan Area Planning Council	
Strategic Asset Plan	Town of Brookline	
Major Parcels Study	Town of Brookline	
Out of School Time Report	Brookline Community Foundation	
Understanding Brookline: Emerging Trends and Changing Needs	Brookline Community Foundation	
Understanding Brookline: A Report on Poverty	Brookline Community Foundation	
Envision Concord; Bridge to 2030	Town of Concord	
Concord Housing Production Plan, 2015	Town of Concord	
Hazard Mitigation Plan, 2017 update	Concord, Metropolitan Area Planning Council	
Framingham PHA 5-Year Plan and Annual Plan	Framingham Housing Authority	
Framingham Open Space Plan and Recreation Plan 2013	City of Framingham	
Framingham Housing Plan, Updated 2014	City of Framingham	
Southeast Framingham Neighborhood Action Plan	City of Framingham	
Downtown Framingham TOD Action Plan 2015	City of Framingham	
Lexington Housing Production Plan, 2014	Town of Lexington	
Lexington Comprehensive Plan, 2020	Town of Lexington	
Natick Housing Production Plan 2019	Natick Affordable Housing Trust	
Natick 2030+ Master Plan	Natick Planning Board	
Natick Subsidized Housing Inventory Projections, 2018	Town of Natick	
Natick Open Space Plan, 2012, Updated 2020	Natick Open Space Advisory Committee	
Natick Subsidized Housing Inventory Projections, 2018	Town of Natick	
Previous local housing plans	Town of Needham	
Needham Housing Guidelines	Town of Needham	
Assessment of Housing and Transit Options for Needham Seniors	Town of Needham	
Other HOME reports	Town of Needham	
Needham Housing Authority Facilities Master Plan	Needham Housing Authority	
Town-prepared Demographic, Economic and Housing Profiles	Town of Needham	
2007 Comprehensive Plan	City of Newton	
2016 Newton Leads 2040 Housing Strategy	City of Newton	
FY2020 Quarter Reports, Emergency Solutions Grant Subrecipients	City of Newton	
City of Newton, Health and Human Services Department, Division of Social Services, FY22 (FFY21) Annual Report	City of Newton	
Newton Department of Public Works, Accelerated Pavement Management Program, 2019 Update	City of Newton	

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Planning for a Livable All Age-Friendly Newton (PLAAN)	City of Newton	The Strategic Plan of the FY21-25 Consolidated Plan, in addition to the FY23 Annual Action Plan, adopts many of the priorities and strategies included in these plans.
Living and Aging in Newton: Now and In the Future	City of Newton	
2018 Fair Housing Audit	City of Newton	
Climate Change Vulnerability Assessment and Action Plan, December 2018	City of Newton	
2017 Transition Plan	City of Newton	
Hazard Mitigation Plan, 2019 Update	City of Newton	
Open Space and Recreation Plan, 2020-2027	City of Newton	
Sudbury Master Plan 2020	Town of Sudbury	
Housing Production Plan, 2016	Town of Sudbury	
Hazard Mitigation Plan, 2010	Town of Sudbury	
Basic Housing Needs Assessment for Waltham, MA	Metropolitan Area Planning Council	
Waltham Housing Authority Annual Plan, 2022	Waltham Housing Authority	
City of Waltham Transportation Master Plan, 2017	Waltham Engineering & Planning Departments	
City of Waltham Open Space & Recreation Plan	Waltham Planning Department	
Population and Housing Demand Projections, 2014	Metropolitan Area Planning Council	
Watertown Housing Production Plan, 2014	Town of Watertown	
Watertown Comprehensive Plan, 2015	Town of Watertown	
Watertown Housing Plan, 2021-25 (adopted by WHP and Council)	Town of Watertown	
Wayland Housing Production Plan, 2016	Town of Wayland	
Wayland Hazard Mitigation Plan, 2011	Town of Wayland	
Wayland Masterplan Review, 2010	Town of Wayland	

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

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

During the Consolidated Planning process, Division staff employed a number of methods to solicit citizen and agency input, including three Community Needs Assessment Meetings open to the public; a series of inter-departmental needs assessment sessions including representatives from Health and Human Services, Economic Development, Conservation, Public Works, Senior Services, Engineering, Parks and Recreation, and Transportation; a number of presentations and discussions with city boards and commissions including the Commission on Disability, the Fair Housing Committee, and the Newton Housing Partnership; a series of brown bag lunches / discussions with Newton's Human Service and ESG subrecipients; and other focused meetings and phone calls with other relevant agencies and stakeholders, such the City's Continuum of Care partners at the Balance of State (DHCD).

In an effort to reach a broad base of stakeholders, particularly low- to moderate-income individuals, the three Community Needs Assessment Meetings were held in three locations in different parts of the City, and at various times of the day. The Newton Community Development Foundation (NCDF) and FamilyAccess, both human service subrecipients, hosted the first two meetings. The events were held at Weeks House, NCDF's mixed-income housing development and the gymnasium at FamilyAccess. Many of the participants at the Weeks House event were low-income elderly residents of the site, and the participants at the Family Access event included a number of low- to moderate-income individuals actively engaged in a search for affordable housing in Newton.

Staff also discussed the Annual Action Plan at various boards and commissions meetings from December through February, including the following: the Fair Housing Committee; Newton Housing Partnership; Newton Commission on Disability; and local providers of the former Brookline-Newton-Waltham-Watertown Homelessness Continuum of Care. In accordance with HUD guidance and the City's Citizen Participation Plan, a public hearing will be held for a review of the Plan by the City's Planning and Development Board on May 2, 2022. A virtual public hearing will be conducted in place of an in-person meeting due to the Coronavirus (COVID-19). Instructions for participating in the hearing via ZOOM were detailed in the City's public notice advertising the hearing. An accessible draft of the document was made available on the City's website a week in advance of the hearing and copies of the Annual Action Plan were available in other languages upon request.

In addition, notice of the draft Annual Action Plan's availability and the date of the public hearing was included in the Planning and Development Department's weekly report that is distributed digitally to several hundred recipients, including local nonprofits and other organizations serving low- and moderate-income individuals and minorities. A notice for the public hearing was published in the Newton TAB, as well as in the newspapers of the twelve other WestMetro HOME Consortium communities during the week of April 18, 2022. The notice



provided contact information for the City's ADA coordinator, and telecommunications relay service, for anyone that seeks to request a reasonable accommodation.

### *Consortium Communities*

The Towns of Bedford, Belmont, Concord, Lexington, Sudbury and Wayland use public hearings at the Board of Selectmen/Select Board meetings when broad public input is needed and/or public hearings are required. The local Boards (Bedford Municipal Affordable Housing Trust, Bedford Housing Partnership, Belmont Housing Trust, Concord Housing Development Corporation, Lexington Housing Partnership, Sudbury Housing Trust, and Wayland Housing Trust) hold monthly meetings to review and deliberate on all proposed or ongoing affordable housing projects.

In Brookline, the Housing Division staffs the Brookline Housing Advisory Board (HAB), which holds monthly meetings to review all affordable housing projects being undertaken or considered by the Town. All final funding commitments for affordable housing projects are approved by the Board of Selectmen, which act on recommendations from the HAB and hold public hearings for public input. All HAB meetings are open to the public and advertised on the Town's website and blog, to all interested parties, including all Town Meeting members monthly.

The Brookline Housing Division reached out to an extensive network of affordable housing advocates including Brookline's boards, commissions, staff, nonprofits, social services agencies, affordable housing developers, and human and health services providers, to participate in the formulation of the FY23 (FFY22) Annual Action Plan. In addition, Brookline is developing a Housing Production Plan for the next five years. The current planning study updates and enhances the Town's 2016 Housing Production Plan (HPP). The main purposes of the Plan are to create and preserve equitable, affordable housing and to exceed the state's 10% subsidized housing inventory threshold under Massachusetts General Law Chapter 40B. The Plan will build on housing, social, economic, and real estate data, the housing needs assessment, and other local and regional planning studies by including multiple avenues of community engagement with people across a variety of incomes, racial and ethnic communities, and neighborhoods.

On January 1, 2022, Framingham began its fourth year as a City. In FY20, the City established new protocols for accepting HUD funds that will continue in FY23. As a result, Community Development Program (CD) staff recommends a budget to the mayor that the City Council ratifies. Once the council provides authorization for the municipality to accept HUD funds, CD staff submits its Annual Action Plan to HUD. The City's Community Development Committee (CDC) holds a series of meetings and public hearings. To amplify CDC outreach efforts, staff invites resident input through newspapers, emails and other forums.

The Town of Natick is fortunate to have two housing committees: The Natick Affordable Housing Trust (NAHT) and the Community Development Advisory Committee (CDAC). The NAHT and the CDAC meet concurrently every month to discuss and advocate for affordable housing. The CDAC focuses on planning and establishing goals based on Natick demographics and town

policy while overseeing two important planning documents, the Natick Housing Plan and the WestMetro HOME Consortium 5-year Consolidated Plan. In contrast, the NAHT is tasked with developing and providing affordable housing opportunities through the maintenance and expenditure of local Housing Trust funds and federal HOME funds received through the WestMetro HOME Consortium. Furthermore, the Natick Housing Production Plan, dated March 2021, provides a series of strategies to preserve and increase affordable housing stock within the community. The Housing Production Plan prepared by Barrett Planning Group is a product of public participation and municipal collaboration.

Needham's Affordable Housing Trust conducts meetings to discuss housing initiatives and other housing-related issues. The Trust holds meetings at least twice a year with special meetings as needed, which the public is notified of and encouraged to attend. Needham is also embarking on preparations of a housing plan to obtain updated information on local demographic and housing changes and determine the impact these changes have on current housing needs. In order to move forward on a proactive housing agenda, the Town needs a current understanding of the local housing dynamic to identify and prioritize unmet housing needs. To that end, the Needham Planning Board appointed a working group of representatives of various town boards and committees as well as three at-large community members. Fundamental to this planning effort is a robust community engagement process of public forums, interviews, and a survey to ensure that residents have opportunities to express their thoughts about local housing issues and an action plan.

In January 2022, the Waltham Planning Department posted an online housing and community development needs survey. This public survey was posted to the City website and was promoted via City social media accounts. The City of Waltham Planning Department held a public meeting on January 18, 2022 to gather input on the FY23 (FFY22) Annual Action Plan. Topics discussed included housing and community development needs and the proposed use of funds for the upcoming year.

In Watertown, the Watertown Housing Partnership serves as the City's policy body, whose volunteer members are appointed by the city manager to oversee the development and preservation of affordable housing. The Partnership uses email to announce its meetings, as well as agenda postings. The Watertown components of the FY23 (FFY22) Annual Action Plan were reviewed and approved by the Partnership.

AP-15: Citizen Participation Outreach for the City of Newton and the WestMetro HOME Consortium

Type of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted	Other from Mode
<b>BEDFORD</b>					
Public Meeting	Non-targeted/broad community	Housing Trust held a public meeting and reviewed and provided input for the AAP	None Received	N/A	N/A
<b>BROOKLINE</b>					
Internet Outreach	Non-targeted broad community / minorities / residents of public and assisted housing	476 responses to a public survey that was issued from August 9th to September 30th; survey available electronically and in-person.	Respondents rated affordable housing as the most important funding activity. Within affordable housing, an emphasis was placed on creating affordable housing for low-income residents and moderate-income residents, families, and seniors. Respondents also provided input on transportation, infrastructure and social service needs in the Town.	N/A	N/A
Public Hearing	Non-targeted broad community	Approval of the FY23 Annual Action Plan	SelectBoard reviewed and approved the Annual Action Plan	N/A	N/A
Hearing and Community Input	Non-targeted broad community	Interviews conducted by Judi Barrett Consultants to gather information in anticipation to the Housing Production Plan	Under scrutiny and analysis	N/A	N/A
<b>CONCORD</b>					
Public Meeting	Non-targeted/broad community	CHCD held a public meeting and reviewed and provided input for the AAP	None Received	N/A	N/A
<b>FRAMINGHAM</b>					
Public Hearing	Non-targeted/broad community	City Council meeting to review and approve the AAP.	City Council reviewed the Annual Action Plan at their March meeting; the Plan was approved	N/A	N/A
<b>LEXINGTON</b>					
Public Meeting	Non-targeted/broad community	Lexington Housing Partnership held a public meeting and reviewed and provided input for the AAP	None Received	N/A	N/A
<b>NATICK</b>					
Public Meeting	Non-targeted/broad community	20+	Preserve existing affordable housing; increase affordable homeownership & help needy elderly with affordable housing options and supportive services	N/A	NA
Public Meeting	Non-targeted/broad community	20+	Allow more accessory dwelling units in single family homes; enact inclusionary zoning for affordable housing; allow greater residential density where appropriate, particularly near commuter rail lines; expand the price range of housing in town.	N/A	NA
Internet Outreach	Non-targeted/broad community	Internet survey with 183 respondents	Encourage: 1) preservation of existing stock of affordable housing; 2) production of homes across a variety of prices and 3) development of homes suited for families	N/A	NA
<b>NEWTON</b>					
Public Meeting	General	17 attendees	On February 2, 2022 the Fair Housing Committee discussed the City of Newton's adoption of an Affordable Housing Trust and the responsibility of the formed committee and fair housing goals. There was also a discussion about the MBTA Communities Act Housing which is an amendment to the State's Zoning Act was part of a large economic development bill that passed last January 2022.	N/A	Fair Housing Committee
Public Meeting	General	13 attendees	The BNWW CoC discussed funding priorities for FY23 ESG and in a special meeting the non-recipients voted on funding priorities (December 8, 2021).	N/A	Homelessness; Brookline-Newton-Waltham-Watertown Continuum of Care
Committee Meeting	General	8 attendees	Representatives from the Housing and Community Development Division, Dept. of Health and Human Services, Executive Office, and the Planning and Development Board met relative to the FY23 Human Services program awards (February 16, 2022 and March 7, 2022). Discussion focused on FY23 applications, past performances, funding priorities and allocation recommendations.	N/A	Human Services RFP Review Committee
Committee Meeting	General	8 attendees	Representatives from the Housing and Community Development Division, Dept. of Health and Human Services, Executive Office, Newton Planning and Development Board, MA BoS CoC, and the former BNWW CoC met relative to the FY23 ESG awards (February 14, 2022 and March 9, 2022). Discussion focused on FY23 applications, past performances, funding priorities and allocation recommendations.	N/A	ESG RFP Review Committee
Committee Meeting	General	17 attendees	On January 18, 2022 the Newton Housing Partnership discussed long-term policy changes to strengthen Newton's approach to DEI in affordable housing by meeting with members of the Boston Housing Authority to better understand property manager tenant selection processes. On February 15, 2022 the NHP received a presentation from the developer of the West Newton Armory Affordable Housing Project and voted to recommend that the project receive its proposed FY23 CDBG and HOME funding requests.	N/A	Newton Housing Partnership
Public Meeting	General	12 attendees	The COD discussed the FY23 AAP process and made a recommendation for FY23 CDBG architectural access project on January 10, 2022.	N/A	Commission on Disability
Public Hearing	General	11 attendees	Presentation of draft FY23 Annual Action Plan and summary of activities to be undertaken during FY23/FY22 on May 2, 2022. Housing Division staff answered questions from the Board about CDBG funding eligibility, including new construction and tenant relocation. A board member commented about the potential impact of a CDBG-funded economic development in the future. The P&D Board unanimously recommended submission of the Annual Action Plan to HUD.	N/A	P&D Review
Public Hearing	General	18 attendees	Presentation of draft FY23 Annual Action Plan and summary of activities to be undertaken during FY23/FY22 on June 1, 2022. The ZAP recommended the Annual Action Plan for submission to HUD.	N/A	Zoning and Planning Committee
<b>SUDBURY</b>					
Public Meeting	Non-targeted/broad community	Sudbury Housing Trust held a public meeting and reviewed and provided input for the AAP	None Received	N/A	N/A
<b>WALTHAM</b>					
Public Meeting	Non Targeted Outreach	Meeting to discuss the Draft Annual Action Plan and seeking comments from community members.	Presentation of draft FY23 Annual Action Plan and summary of activities to be undertaken during FY23/FY22 January, 2022.	N/A	N/A
Internet Outreach	Non-targeted/broad community	From Jan 28 – March 22 2021, the Waltham Planning Department had a community development needs survey that was open to the public. This survey was posted to the City website and was promoted via City social media accounts.	39 respondents filled out the survey. The survey gauged respondents opinions from low, medium, and high on the need for community development topics such as homeless assistance, ESL program offerings, rental assistance programs, anti poverty programs, etc.	N/A	N/A
Public Meeting	Non-targeted/broad community	Meeting to discuss the Draft Annual Action Plan and CDBG application release and seeking comments from community members. 9 people attended.	Presentation of draft FY23 Annual Action Plan, CDBG application release and summary of activities to be undertaken during FY22/FY23 on 1/18/2022 via Zoom.	N/A	N/A
Public Meeting	Non-targeted/broad community	Meeting to discuss substantial amendment regarding CDBG CV funds and HOME PI transfer for Beaverbrook elderly housing complex ADA improvements. No attendees.	Held January 6th 2022 virtually via Zoom. No comments received.	N/A	N/A
<b>WATERTOWN</b>					
Public Meeting	Non-targeted/broad community	N/A	Meeting of the Watertown Housing Partnership.	N/A	N/A
<b>WAYLAND</b>					
Public Meeting	Non-targeted/broad community	Wayland Housing Partnership will host a public meeting to solicit feedback when new HOME projects/programs are identified	None Received	N/A	N/A

## EXPECTED RESOURCES

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

#### **1. Introduction**

The City of Newton anticipates receiving \$3,653,792.00 in CDBG, HOME and ESG funds, plus an additional \$205,000 in program income, during the July 1, 2022- June 30, 2023 program year. Investments are targeted to a myriad of community needs and priorities identified in the FY21-25 Consolidated Plan and include the acquisition, development, rehabilitation, and preservation of affordable housing; homelessness assistance and prevention; human services; architectural access and program administration. To maximize the impact of these HUD entitlement funds, the City strategically leverages additional funds and partnerships whenever possible.

See AP-15: Anticipated Resources at the end of this section.

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

The City will use federal funds to leverage additional resources in several ways. With respect to affordable housing projects, federal HOME and CDBG funds will be complemented with city controlled Community Preservation Act (CPA) funding to produce and preserve affordable units wherever possible. CPA funding provides the flexibility to produce mixed-income developments, as this funding source can be used to support households earning up to 99% of AMI. Available funds collected as a result of the City's Inclusionary Zoning Ordinance can further supplement these resources. Inclusionary Zoning (IZ) funds are paid by developers of multi-family housing projects in lieu of providing affordable units on site. A combination of public investments using CDBG, HOME, CPA and IZ funding, in addition to other state investments (such as tax credits, etc.) and private financing, facilitate affordable housing development in Newton.

Relative to CDBG Human Services and ESG program, respondents to the City's Request for Proposals (RFP) must detail complete program costs and resources to be utilized in conjunction with the CDBG and ESG funds. ESG funds are required to be matched by 100 percent. Leveraged funds include fundraised dollars, McKinney-Vento funds, housing vouchers, community foundations and trusts, and state grant allocations. In FY21 (FFY20), the ESG program exceeded its requirement and leveraged approximately \$365,000.00 in matching funds with a combination of state and private funds. While the Human Services program does not have a matching requirement, in FY21 (FFY20), the program leveraged approximately \$365,000 from private foundations, organizational fundraising, state agencies, the City, and program fees.

HOME communities support housing projects by leveraging HOME funds with state, Community Preservation Act, Inclusionary Zoning and other town funds. Communities additionally report forgone taxes from HOME match-eligible affordable housing units and state and local tenant based rental assistance program funds as contributions toward HOME's 25 percent match requirement.

In FY23, The Town of Belmont will continue exploring how to use HOME funds to pay for potential housing development opportunities at the existing Belmont Housing Authority properties. The town will continue conversations with the Belmont Housing Authority on ways to assist with pre-development funds for their redevelopment of Sherman Greens.

In FY23, the Town of Brookline will continue working on permitting and conceptual planning for two anticipated age-restricted housing development projects: the Hebrew Senior Life (HSL) expansion at 108 Centre Street and the development of an affordable rental senior housing project (62+) at the Kent/Station Street Town-owned parking lot. Both projects entail the production of new affordable rental housing units targeted to very low income and low income populations. HSL's 108 Centre Street expects to receive its Comprehensive Permit by early January and has been invited to submit for the DHCD's full funding round in mid-January 2022. This project has begun a Section 106 Historic Review, as required by federal funding sources. The Town anticipates setting aside HOME funds in order to supplement and match any state or federal funding needed, or any private investment in the form of sponsor loans, bonds or low income housing tax credit equity. These multimillion-dollar projects involve private equity, tax credits, and state funding and will exceed the HOME match requirements.

In addition, on May 4, 2021, Brookline residents voted to adopt the Community Preservation Act. The Town is working on adopting policy for its Community Preservation Fund. Brookline finances the CPA funds in part by a 1% surcharge on residential and commercial property tax bills, the collection of which began in 2022.

In FY23, Concord anticipates the Christopher Heights (also referred to as the Junction Village) project to be underway. The project leveraged HOME funds with extensive local, state and federal funding. These funds will exceed the HOME match requirements

In fulfilling its mission to create affordable housing and rehabilitate housing stock with HOME funds, projects completed by the City of Framingham have included CDBG, historic and low-income housing tax credits, Emergency Solutions Grant, National Housing Trust Fund, HOPWA and private funds, among others. In order to stem the housing crisis for many low and moderate income families, the City will assist eligible households with TBRA funds to secure affordable housing. Clients are expected to use other funds to assist with moving costs. Additionally, the City Council has allocated \$1,465,000 in water and sewer enterprise funds for the upcoming Carlson Crossing project.

In Lexington, LexHAB is planning for a six-unit development project. This project will primarily be funded with local CPA funds and potentially HOME funds.

The Natick Housing Trust was allocated \$320,000 in municipal funds since 2018 (\$80,000 per year) to develop affordable housing and will continue making regular requests in the future. These funds will be augmented by fees paid to the Trust by housing developers under Natick's new inclusionary requirements for affordable housing.

Needham continues to support the Needham Housing Authority's efforts to modernize and redevelop existing properties to address antiquated and inaccessible design issues and potential construction deficiencies. The Town committed CPA funding to enable the NHA to hire a development consultant to assist the NHA in applying for necessary financing to stabilize, recapitalize, and preserve its affordable housing. The Town's Community Housing Specialist served on the special committee charged with reviewing proposals in response to a Request for Proposals. The Committee recommended that the NHA hire the Cambridge Housing Authority (CHA) to undertake the work, which the NHA Board approved.

In January 2022, Waltham began the public process to complete a substantial amendment to the AAP to utilize \$400,000 in HOME funds and \$400,000 in CDBG funding for an accessibility upgrade project at Beaverbrook Apartments, a senior living property owned by the Waltham Housing Authority. This site was previously awarded 1.2 million in Community Preservation Act funding in 2021 for the roof replacement. Waltham HOME fund expenditures are matched annually with \$210,000 in MVRP vouchers. The Community Preservation Committee has approved \$6,000,000 for 2Life Communities'/Deaconness development of the Leland Home; 79 rental housing units with supportive services that is affordable in perpetuity and serves older adults age 62 and older.

Watertown opened its initial Community Preservation Act (CPA) funding round in fall 2021. The first awards will be made in spring 2022. The City enacted a two percent surcharge, and created the property assessment and taxation infrastructure to collect and sequester these funds. It presently has over \$10 million in the CPA reserve and the expected annual revenue stream is over \$2 million. The CPA funds can be used for future projects, thereby leveraging federal HOME funds. In addition, the City has approximately \$269,000 in its Affordable Housing Trust Fund generated by cash-in-lieu payments for affordable Inclusionary Zoning units.

**3. 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 Newton 2Life Communities' Golda Meir House Expansion Project, which will convert underutilized, municipal land into affordable housing, is expected to near completion in FY24. This project was awarded FY18, FY20 and FY21 HOME funds to support the new construction of 68 affordable rental units for seniors ranging from 30% AMI up to 99% AMI, including 9 units for chronically homeless adults with disabilities. To successfully provide permanent supportive housing, 2Life Communities partnered with Hearth, Inc., a nonprofit organization dedicated to the elimination of homelessness among the elderly through prevention, placement, and

housing programs. In early August 2021, the project financing was closed and construction is in progress.

In addition, the City of Newton will support the development of the Haywood House. The Newton Housing Authority's (NHA) Haywood House project closed on its Low Income Housing Tax Credit financing in the Spring of 2021. As a result, construction has commenced with an anticipated completion of Spring of 2023. The project, which was awarded FY20 and FY21 Newton CDBG funds, will create 55 new affordable rental units for seniors. The income eligibility will range from 30% AMI to 99% AMI. Three of the units will be fully accessible and four units will be designated for households that have been homeless or are at risk of homelessness. The project will also include two elevators and community space for supportive services.

The City of Newton will continue to push forward the redevelopment of the West Newton Armory site on Washington Street into 100% affordable housing. As an awardee of a \$200,000 Housing Choice Grant from the Department of Housing & Community Development (DHCD), the City hired an affordable housing consultant in FY21 to conduct a predevelopment feasibility study on the site. Concurrently, as part of the City's Real Property Reuse process, the West Newton Armory Joint Advisory Planning Group (JAPG), consisting of nine community members, analyzed the property and its redevelopment potential over the course of eleven months. Following the completion of the consultant's study and the JAPG's report, the City Council unanimously recommended to the Mayor that the City purchase the Armory for \$1 from the State for its redevelopment into 100% affordable housing. Newton took ownership of the Armory in the Fall of 2021 and selected Metro West Collaborative Development/Civico Development through an RFP process, to partner in the redevelopment of the site. The Metro West/Civico proposal includes 43 units of intergenerational housing affordable to households earning 30-60% of the Area Median Income. The project is anticipated to be complete in FY25. At a public hearing in April, the Planning and Development Board will vote on the pre-commitment of future years' CDBG and HOME funding, and the City's Inclusionary Zoning funds, to develop the Armory into affordable housing with supportive services.

In FY23, the City will continue to advance the CAN-DO Acquisition and Preservation project through the second phase: property rehabilitation. In FY20 (FFY19), the Newton Housing Authority received funding approval from the City's Planning & Development Board and Community Preservation Committee to acquire and preserve the CAN-DO affordable housing portfolio of 33 units across 12 scattered sites in Newton. The affordability of the housing was placed in jeopardy when CAN-DO disaffiliated from its management partner, Metro West Collaborative Development, in 2018. In FY21 (FFY20), the Newton Housing Authority officially closed on the acquisition of the portfolio. During the closing process, CAN-DO added an additional property (236 Auburn Street), to the sites to be acquired by the NHA. This increased the acquisition to 36 units across 13 scattered sites, 33 units of which were financed by CDBG funds. Once the acquisition and debt reduction was complete in FY21, the City began to rehabilitate the properties, prioritizing the units with the greatest infrastructure and safety needs. This rehabilitation commenced in FY21 and will continue throughout FY23.

In addition to the preservation of the CAN-DO portfolio, the City is actively preserving affordable senior housing at 2Life Communities' Coleman House with FY21 CDBG and-FY22 HOME funds. These funds are being used to conduct a comprehensive rehabilitation to the building's mechanical systems and infrastructure, as well as accessibility design upgrades to each of the 146 units. The improvements will make the project more efficient and environmentally sustainable for the next several decades, as well as improving the quality of life for senior residents. Construction began in the Summer of 2021 and will continue through FY23.

#### *Consortium Communities*

The Town of Bedford conveyed a five acre property to a private developer to construct homeownership units, four of which were sold in FY20 to income eligible first time buyers.

The Town of Belmont will examine existing Belmont Housing Authority properties to assess potential housing development opportunities at these locations.

The Town of Brookline owns and plans to utilize a municipal parking located at the Kent/Station Street intersection to develop senior affordable housing. The parcel is intended to be developed as a senior affordable housing development project (age-restricted), and the project was identified in the 2016 Town's Housing Production Plan as an appropriate match. The 2021 Housing Production Plan will provide the identification and assessment of existing municipal facilities that will be needed in the next 5 to 15 years for its programmatic and service goals, including affordable housing; and, a Major Parcel Study (MPS) that identifies properties throughout Brookline that might offer development potential.

The Junction Village property in Concord is owned by the Concord Housing Development Corporation (CHDC), the CHDC is working with a private developer to construct 83 units of affordable housing for seniors 62+ years old with tiers of affordability: 17 units for extremely low income households at 30% AMI, 26 units for very low income households at 60% AMI, and 40 units for high moderate income households at 150% AMI. The project, known as Christopher Heights of Concord, will be funded in part by local and state HOME funds.

Natick is working to issue an RFP for the development of a single-family affordable home on North Main Street that was taken through the tax title process.

Needham is supporting Needham Housing Authority (NHA) plans to modernize its federally-sponsored developments at Seabeds Way, Captain Robert Cook Drive, and High Rock as well as options for making important improvements to its state developments of Linden and Chambers. The NHA hired the Cambridge Housing Authority (CHA) as development consultants to guide the refinancing its properties to make capital improvements and potentially produce new units.

Waltham is exploring reuse opportunities at the former Fernald Development Center site, located off Trapelo Road. Specifically, the City is pursuing Community Preservation Act funds to restore the Marquardt building on the site for Veterans affordable housing.



The Town of Wayland has completed the sale of a town-owned parcel for the development of a 218 unit multi-family rental community. Fifty-five of the units will be designated affordable and a portion of the project will be age-restricted. This development, Rivers Edge, will serve the need of low-moderate income families and add housing choices for the increasing senior population in Wayland.

**AP-15 Anticipated Resources for City of Newton & WestMetro HOME Consortium for FY23**

Program	Source	Use of Funds	Expected Amount Available FY23 (FFY22)		Amount Expected to be Available the Remainder of the ConPlan	Narrative Description
CDBG	public - federal	Acquisition/Mortgage Refinance for Housing Development, Administration & Planning, Housing Rehabilitation, Public Facilities Improvements, Architectural Access Improvements, Public Services	Annual Allocation (\$)	\$1,870,395.00	\$3,740,790.00	Please see word document for narrative.
			Program Income (\$)	\$55,000.00	\$110,000.00	
			Prior Year Resource(s)	\$4,556.00		
			Total(\$)	\$1,929,951.00	3,850,790.00	
HOME	public - federal	Homebuyer Assistance, and Creation and Rehabilitation of Rental Units. CHDO Operating and Administrative Funds.	Annual Allocation (\$)	\$1,618,338.00	\$3,236,676.00	Unexpended HOME PI is \$7,958.20 and HP is \$295,522.28
			Program Income (\$)	\$150,000.00	\$300,000.00	
			Prior Year Resource(s)	831,114.70		
			Total(\$)	\$2,599,452.70	\$3,536,676.00	
ESG	public - federal	Financial Assistance, Overnight Shelter, Rapid Re-housing, Rental Assistance, Homelessness Prevention Services, Transitional Housing, Street Outreach	Annual Allocation (\$)	\$165,059.00	\$330,118.00	Please see word document for narrative.
			Program Income (\$)			
			Prior Year Resource(s)			
			Total(\$)	\$165,059.00	\$330,118.00	

# ANNUAL GOALS AND OBJECTIVES

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

### 1. Goals Summary Information

The City of Newton receives Community Development Block Grant (CDBG), HOME Investment Partnership (HOME) and Emergency Solutions Grant (ESG) funds from the U.S. Department of Housing and Urban Development (HUD). These funds are utilized to address housing and community development needs in the City of Newton and housing needs in the WestMetro HOME Consortium communities. The FY23 (FFY22) Annual Action Plan identifies eight goals for the City of Newton and three for the WestMetro HOME Consortium.

#### ***Goal: Production of New Affordable Housing Units***

In FY23 (FFY22), CDBG and HOME funding allocated to the City of Newton will continue to be used for a variety of programs and activities to preserve and expand affordable opportunities across the City. In alignment with the FY21-FY25 Consolidated Plan, the Division will seek to fund affordable housing projects near amenities, village centers, and public transportation options to promote housing equality and economic and demographic diversity. The Division will also look to support projects that provide Newton seniors the opportunity to remain in the community as they age, as well as providing opportunities for affordable housing for families. Additionally, the Division will identify projects that expand the stock of accessible and visitable housing.

The 2Life Communities' Golda Meir House Expansion Project, which will convert underutilized, municipal land into affordable housing, is expected to be complete in the Fall of 2023. This project was awarded FY18, FY20, and FY21 HOME funds to support the new construction of 68 affordable rental units for seniors ranging from 30% AMI up to 99% AMI, including 9 units for chronically homeless adults with disabilities. To successfully provide permanent supportive housing, 2Life Communities partnered with Hearth, Inc., a nonprofit organization dedicated to the elimination of homelessness among the elderly through prevention, placement, and housing programs. In early August 2021, the financing was closed for the project and construction is in progress.

The development of the Newton Housing Authority (NHA)'s Haywood House will be complete in FY23. The Haywood House project closed on its Low Income Housing Tax Credit financing in the Spring of 2021. As a result, construction has commenced with an anticipated completion of Spring, 2023. The project, which was awarded FY20 and FY21 Newton CDBG funds, will create 55 new affordable rental units for seniors. The income eligibility will range from 30% AMI to 99% AMI. Three of the units will be fully accessible and four units will be designated for households that have been homeless or are at risk of homelessness. The project will also include two elevators and community space for supportive services.

Newton will continue to push forward the redevelopment of the West Newton Armory site on Washington Street into 100% affordable housing. As an awardee of a \$200,000 Housing Choice Grant from the Department of Housing & Community Development (DHCD), the City hired an affordable housing consultant in FY21 to conduct a predevelopment feasibility study on the site. Concurrently, as part of the City's Real Property Reuse process, the West Newton Armory Joint Advisory Planning Group (JAPG), consisting of nine community members, analyzed the property and its redevelopment potential over the course of eleven months. Following the completion of the consultant's study and the JAPG's report, the City Council unanimously recommended to the Mayor that the City purchase the Armory for \$1 from the State to redevelop it into 100% affordable housing. Newton took ownership of the Armory in the Fall of 2021 and selected Metro West Collaborative Development/Civico Development, through an RFP process, to partner with the City in the redevelopment of the site. The Metro West/Civico proposal includes 43 units of intergenerational housing affordable to households earning 30-60% of the Area Median Income. The project is anticipated to be complete in FY25. At a public hearing in April, the Planning and Development Board will vote on the pre-commitment of future years' CDBG and HOME funding, and the City's Inclusionary Zoning funds, to develop the Armory into affordable housing with supportive services.

***Goal: Preservation of Affordable Units***

In FY23, the City will continue to advance the CAN-DO Acquisition and Preservation project through the second phase: property rehabilitation. In FY20 (FFY19), the Newton Housing Authority received funding approval from the City's Planning & Development Board and Community Preservation Committee to acquire and preserve the CAN-DO affordable housing portfolio of 33 units across 12 scattered sites in Newton. The affordability of the housing was placed in jeopardy when CAN-DO disaffiliated from its management partner, Metro West Collaborative Development, in 2018. In FY21 (FFY20), the Newton Housing Authority officially closed on the acquisition of the portfolio. During the closing process, CAN-DO added an additional property (236 Auburn Street), to the sites to be acquired by the NHA. This increased the acquisition to 36 units across 13 scattered sites, 33 units of which were financed by CDBG funds. Once the acquisition and debt reduction was complete in FY21, the City began to rehabilitate the properties, prioritizing the units with the greatest infrastructure and safety needs. This rehabilitation commenced in FY21 and will continue throughout FY23.

In addition to the preservation of the CAN-DO portfolio, the City will also preserve affordable senior housing at 2Life Communities' Coleman House with FY21 CDBG funds and FY22 HOME funds. The funds will be used to conduct a comprehensive rehabilitation to building mechanical systems and infrastructure, as well as accessibility design upgrades to each of the 146 units. The improvements will make the project more efficient and environmentally sustainable for the next several decades, as well as improving the quality of life for senior residents. Construction began in the Summer of 2021 and will continue through FY23.

***Goal: Support Affordable Homeownership***

Newton’s CDBG-funded Downpayment/Closing Cost Assistance program supports and expands sustainable homeownership among low- and moderate-income households in Newton. The program will target first-time homebuyers of new and existing deed restricted homeownership units. Three income-eligible homebuyer are expected to be assisted through the CDBG Downpayment/ Closing Cost Assistance program in FY23.

***Goal: Rehabilitation of housing***

Staff will continue to market and administer the Housing Rehabilitation program (Rehabilitation program) on a rolling basis, which provides homeowners and qualifying nonprofit organizations with deferred payment loans for repairs and improvements aimed at addressing issues related to health, safety, and building code violations. The Rehabilitation program was expanded to include existing accessory apartments and lodging houses that require repairs to ensure resident health, safety, and building code compliance. Through FY23 and prior year funding, it is anticipated that approximately three units of homeowner housing and 12 rental units will be rehabilitated through CDBG assistance. Eleven rental units are among those acquired by the Newton Housing Authority (NHA) from CAN-DO’s portfolio of rental properties. The NHA’s 390 Newtonville Avenue property, comprised of 11 SRO’s is also expected to be rehabilitated in FY23.

The Housing Authority maintains an additional 57 units of rental housing known as its Management Program (93 units in total, including the 36 CAN-DO units), which are all managed as affordable housing for individuals and families with low incomes. Unlike the NHA’s public housing, this portfolio does not receive any subsidy or capital funds from HUD or DHCD. The NHA has used its own operating funds and occasional grants to maintain these properties throughout Newton. In 2019, the NHA commissioned a capital needs assessment of its 57 Management Program rental units at 13 properties. The assessment revealed significant needs at several properties, totaling \$2,924,044 in recommended first year expenditures alone. The NHA has undertaken some of the recommended improvements but does not have adequate resources to address all of the recommendations in the capital needs assessment. In FY23, the City will work with the NHA to identify CDBG and HOME eligible rehabilitation projects to support the preservation of these important affordable units.

***Goal: Provision of supportive services to the homeless and at-risk of homeless***

With respect to the ESG program, \$152,700 was allocated through a competitive RFP process for local providers to provide emergency shelter, homelessness prevention, and rapid rehousing assistance to homeless and at-risk individuals and families in the Brookline-Newton-Waltham-Watertown region. The City of Newton, BoS CoC, and the BNWW representatives balanced consideration of the population’s greatest needs in the immediate region, continued impacts of the coronavirus pandemic, and HUD’s increased emphasis on funding for homelessness prevention and rapid re-housing assistance. During FY23 (FFY22), ESG funding will support six projects across five sub-grantees.

***Goal: Increase awareness of fair housing policies and practices***

Consistent with the WestMetro HOME Consortium FY21 – FY25 Analysis of Impediments to Fair Housing Choice (AI) the City, in conjunction with the Fair Housing Committee, will continue to collaborate to increase knowledge about fair housing laws and obligations, identify and address discriminatory actions, increase City and Consortium capacity to affirmatively further fair housing and advance access to housing opportunity for all.

In FY23, the City will work with the WestMetro HOME Consortium to implement the strategies of the WestMetro HOME Consortium Analysis of Impediments to Fair Housing Choice. In particular, the Consortium will re-release an RFP in FY23 (FFY22) for a consultant to develop and implement a fair housing testing program throughout the 13 HOME communities. The Consortium will also continue its work with MAPC on a parking utilization study of larger multi-family developments built since 2000. The study will assess whether parking requirements meet or exceed demand in new developments. Parking was identified as a potential barrier to affordable housing in the Consortium’s AI report.

***Goal: Provision of human services***

Human service grants will support 14 public service agencies and organizations during FY23 (FFY22). An estimated total of \$281,000 was distributed through a competitive process held in conjunction with the ESG RFP. Selected projects will cover a wide range of services that will address the needs of vulnerable populations and the City’s three priority areas: 1.) Enrichment and Care for Vulnerable Youth; 2.) Stability and Self-Sufficiency for Vulnerable Adults; and 3.) Promoting Economic Security and Vitality for Older Adults. These projects will directly benefit low- to-moderate- income youth, adults, seniors, as well as persons with disabilities and move these individuals and families toward economic mobility and/or stability.

***Goal: Implementation of architectural accessibility improvements for persons with disabilities***

Approximately five percent of CDBG funding (\$95,000) will be allocated toward the creation of two accessible crossings at the three-way intersection of Langley Road, Warren Street and Chase Street. In addition, other architectural access projects are underway, including an accessible path connecting Auburndale Cove and Lyons Field, referred to as Phase I of the Marty Sender Path. This project is expected to be completed in the Spring of 2022. Construction has been completed for the FY21 Curb Cut project, which includes the upgrade and installation of four curb cuts at the intersection of Watertown Street and Edinboro Street and the intersection of Watertown Street and West Street, and will be closed out in the Spring of 2022.

**HOME Consortium Goals**

***Goal: Tenant Based Assistance for Rental Housing***

In FY23, 22 households will be assisted through Tenant Based Rental Assistance (TBRA) programs in Bedford, Framingham, Natick, Waltham and Wayland. The upfront costs required to access affordable rental housing in the Consortium presents a barrier for many lower income households. A limited rental stock and rising rents in the region, problems that have mushroomed during the COVID-19 pandemic, have also caused an increase in the security

deposit fees and first/last month rent. These conditions continue to place demand on rental assistance programs.

In addition to providing one-time rental assistance, through Waltham's TBRA program, the City also supports near homeless families and very low-income, at-risk elderly households who are on the Waltham Housing Authority's wait list with ongoing rental assistance. The wait time for these households can be up to three years. The temporary rental assistance provided through Waltham's TBRA program safely bridges households into public housing. Framingham also offers a full Tenant Based Rental Assistance programs that provide subsidies as vouchers to landlords to supplement the affordable rent paid by income-eligible households.

***Goal: Rehabilitation of Existing Units***

*Ongoing progress*

The Towns of Belmont, Brookline, Needham and the City of Waltham will focus on rehabilitation of housing authority units in FY23. Recent conversations between the Belmont staff and the Belmont Housing Authority center on ways to support the redevelopment of Sherman Greens with HOME funds. Brookline will continue to work with the Brookline Housing Authority to rehabilitate three rental housing units at the BHA's Morse apartment. In FY23, Waltham will commit \$400,000 in HOME funds and \$400,000 in CDBG funds to conduct accessibility improvements at the Beaverbrook Apartments, a 60-unit elderly apartment development owned by the Waltham Housing Authority.

Needham continues to work with the Needham Housing Authority on potential modernization and/or redevelopment efforts to improve and expand the supply of affordable units in the community. With CPA funding support from the Town, NHA has brought on the Cambridge Housing Authority as consultants to determine the most appropriate funding sources to refinance and reposition its inventory of units. The overall goals include completing improvements, producing new units, and enhancing its operations. Needham expects to allocate CPA and HOME funds to support these efforts.

In FY23, the Natick Affordable Housing Trust will explore partnering with a nonprofit to use HOME funds to start a critical Housing Rehabilitation program for income-eligible households.

Watertown plans to allocate \$145,897.85 of its FY19 HOME Program Income funds for the necessary elevator replacement at St. Joseph's Hall, a senior affordable housing project. HUD has approved the request for "troubled project" status to allow further HOME funding. The MetroWest Collaborative, City and WestMetro HOME Consortium are working together to comply with further requirements for allocating HOME resources to this project. Also, during FY22, the WestMetro HOME Consortium conditionally awarded the project \$223,779.75 in Consolidated Pool funds. HOME funds will be used to replace the elevator and fund the relocation of the building's tenants during the construction. The work is anticipated to begin in late FY22 or early FY23.

***Goal: Production of Affordable Units***

*Ongoing progress*

In FY23, Brookline expects to conduct scoping and environmental review of Hebrew Senior Life's 108 Centre Street Housing Development Project. The number of new HOME units that will be included is an ongoing discussion. The Town anticipates the project will take approximately two and half years from now until occupancy.

The Town of Concord has a history of supporting efforts to establish and maintain affordable housing. Concord is in process of committing \$655,743 in FY19, FY20, FY21, FY22, and FY23 local and Consolidated Pool HOME funds to the Christopher Heights (also known as the Junction Village) development. In addition, \$116, 345 in FY21 and FY22 HOME funds that were originally allocated to the Concord Housing Authority's 367 Commonwealth Avenue project will now be used for the Christopher Heights development. The CHA's project was cancelled due to increased construction costs. The Christopher Heights project leverages \$3,000,000 in local funds and additional state and federal funding for the construction of 83 new deed-restricted units of assisted living with five local HOME assisted units. Construction is anticipated to be underway in FY23.

The Framingham Housing Authority (FHA) is proposing to redevelop Carlson Crossing, a 40 million dollar initiative to rehabilitate 125 housing units in 31 existing buildings. The project will also add three new buildings with seven accessible units. A total of 132 units will be included in the Carlson Crossing project, with four HOME designated units among the 2 phases.

The Town of Wayland will continue to make progress on efforts to develop River's Edge, a previously town-owned parcel on Route 20. Construction is currently underway to build 218 multi-family residential units. Fifty-five of the units will be designated as affordable and a portion of the project will be age-restricted.



AP-20 FY23 GOALS FOR NEWTON AND THE WESTMETRO HOME CONSORTIUM

Name of Goal	Funding	Description of Goal	Priority Needs Addressed	Category of Goal	Start Year	End Year	Outcome	Objective	Goal Outcome Indicator	Quantity	GOI Unit of Measurement
<b>NEWTON</b>											
Administration	CDBG: \$385,079.00	Administration of the CDBG program	Affordable housing, production of units; affordable housing, rehab.; affordable housing, acquisition of existing units; non-housing community development, public services; architectural access; fair housing	Affordable housing; Non-homeless special needs; Non-housing community development	2021	2025	Availability/Accessibility	Create suitable living environments	23- Other (Organization)	1	23- Other (Organization)
Production of New Affordable Units	CDBG: \$897,628.31	Create affordable rental and ownership housing near amenities, village centers, and public transportation options to promote housing equality and economic and demographic diversity. Support older adults to allow them to remain in Newton as they age.	Affordable housing, production of units	Affordable housing	2021	2025	Affordability	Provide decent affordable housing	7-Rental units constructed	55	7-Household housing unit
									9-Homeowner housing added	0	9-Household housing unit
Support Affordable Homeownership	\$0	Financial support for low- and moderate-income first-time homebuyers purchasing deed-restricted affordable units.	Affordable housing, rehab of existing units	Affordable housing	2021	2025	Affordability	Provide decent affordable housing	11-Direct financial assistance to homebuyers	3	11-Households assisted
Rehabilitation of Existing Units	CDBG: \$267,493.69 HOME: \$129,286.60	Continued funding for the housing rehab program for income-eligible residents, including improvements for accessibility and safety, especially for seniors to encourage aging in place.	Affordable housing; acquisition of existing units	Affordable housing	2021	2025	Sustainability	Create suitable living environments	8-Rental units rehabilitated	12	8-Household housing unit
									10-Homeowner housing rehabilitated	3	10-Household housing unit
Preservation of Affordable Units	\$0	Preserve the affordability of deed-restricted units to support successful tenancy of low- to moderate-income residents of Newton.	Affordable housing; acquisition of existing units	Affordable housing	2021	2025	Sustainability	Provide decent affordable housing	23-Other - please specify	33	23-Other - please specify
Fair Housing	\$0	Meet the need for more fair housing education, enforcement, and obligations.	Fair Housing	Affordable housing	2021	2025	Availability/accessibility	Provide decent affordable housing	23-Other - please specify	1	23-Other - please specify
Supportive Services for Homeless and At-Risk of Homelessness	ESG: \$165,059.00	Provide supportive services for individuals and families that are homeless or at-risk of homelessness, including financial support for existing emergency and transitional housing.	Homeless, emergency shelter/transitional housing; homeless, prevention; homeless, rapid re-housing	Homeless	2021	2025	Availability/accessibility	Create suitable living environments	23-Other - please specify	390	23-Other - please specify
Human Services	CDBG: \$289,250.00	Financial support for programs that directly benefit low- and moderate-income youth, families, seniors, and persons with disabilities.	Non-housing community development, public services	Non-homeless special needs	2021	2025	Availability/accessibility	Create suitable living environments	3-Public service activities other than Low/Moderate Income Housing benefit	2,247	3-Persons assisted
Architectural Access	CDBG: \$90,500.00	Remove architectural barriers and increase access and mobility throughout the City to public thoroughfares, public buildings, parks and recreational facilities.	Architectural Access	Non-housing community development	2021	2025	Availability/accessibility	Create suitable living environments	1-Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	1,385	1-Persons Assisted
<b>HOME CONSORTIUM</b>											
Administration	HOME: \$196,558.80	Administration of the HOME program	Tenant Based Assistance; Housing Rehab; Production of Rental Units	Affordable housing	2021	2025	Affordability	Provide decent affordable housing	23- Other (Organization)	9	23-Other (Organizations)
Tenant Based Assistance for Rental Housing	HOME: \$1,016,776.82	HOME funds will be used for local TBRA programs to assist eligible households with security deposit assistance to move-in to affordable rental housing.	Tenant Based Assistance for Rental Housing	Affordable housing	2021	2025	Affordability	Provide decent affordable housing	12-Tenant-based rental assistance / rapid rehousing	22	12-Households Assisted
Rehabilitation of Existing Units	HOME: \$1,722,547.09	HOME funds will be used to support the rehabilitation of affordable rental units, including public housing, and homeowner housing throughout the Consortium.	Housing Rehab	Affordable housing	2021	2025	Sustainability	Provide decent affordable housing	8-Rental units rehabilitated	0	8-Household housing unit
									10-Homeowner housing rehabilitated	0	8-Household housing unit
Production of Affordable Units	HOME: \$1,427,969.34	HOME funds will be used to increase affordable rental housing in the Consortium.	Production of Rental Units	Affordable housing	2021	2025	Affordability	Provide decent affordable housing	7-Rental units constructed	0	12-Households Assisted
									9-Homeowner housing added	0	12-Households Assisted
CHDO-Set Aside	HOME: \$447,559.50	HOME funds will be used to create affordable rental housing through acquisition, rehabilitation and development by CHDOs	Production of Rental Units; Housing Rehab	Affordable housing	2021	2025	Affordability	Provide decent affordable housing	8-Rental units rehabilitated	0	8-Household housing unit
									7-Rental units constructed	0	8-Household housing unit
CHDO Operations	HOME: \$124,593.25	HOME funds for the operation of Community Housing Organizations in the WestMetro HOME Consortium.	Production of Rental Units; Housing Rehab	Affordable housing	2021	2025	Affordability	Provide decent affordable housing	23- Other (Organization)	1	23- Other (Organization)

## **AP-35 Projects - 91.420, 91.220(d)**

### **1. Introduction**

During the third year of the 2021-2025 Consolidated Plan, funding will address unmet community needs and continuing commitments to priority multi-year initiatives. Proposed projects and activities remain consistent with HUD priorities, seeking to primarily assist vulnerable low-to-moderate income residents through the creation and preservation of decent housing, suitable living environments and expanded economic opportunity.

See sheet [AP-35: Projects](#) at the end of this section.

### **2. Describe the reasons for allocation priorities and any obstacles to addressing underserved needs**

Division staff allocated CDBG funding to four general categories: Affordable Housing, Human Services/Public Services, Architectural Access, and Program Administration. These categories are funded based on the priorities and needs detailed in the FY21-25 Consolidated Plan.

#### **Affordable Housing**

Approximately 60 percent of CDBG funds, \$1,129,372 combined with \$35,750 in estimated FY23 (FFY22) program income, for a total of \$1,165,122, will be allocated to affordable housing projects to be identified during the FY23 (FFY22) program year. This funding will be used to facilitate housing rehabilitation and acquisition of units for low- and moderate-income households.

#### **Human Services/Public Services**

The Human Service Grants will fund 14 public service agencies and organizations during FY23 (FFY22). These programs directly benefit low-to-moderate income residents, offering a critical network of supports to provide essential services for low-to-moderate income children, youth, families, adults, seniors and persons with disabilities and assist in stabilizing vulnerable families across the lifespan. The City intends to allocate 15 percent of CDBG funds to these programs, approximately \$276,444, the maximum allowed by regulation. These funds will be combined with \$4,515 in prior year program income for a total of \$280,959 to be made available for the FY23 Human Service program.

#### **Architectural Access**

Five percent of the FY23 (FFY22) CDBG allocation, \$90,500 will be allocated to the creation of two accessible crossings at the three-way intersection of Langley Road, Warren Street and Chase Street.

#### **Program Administration**

Staff intends to allocate the maximum allowable amount of 20 percent for program

administration, or \$374,079 combined with \$11,000 in anticipated FY23 (FFY22) program income, for a total of \$385,079.

Federal funds will be used to assist the greatest number of families and households possible, however, the primary obstacle to addressing underserved needs in the categories listed above continues to be limited funding. Neighborhood opposition to affordable housing projects and increasing land costs and market values, further spurred by the COVID crisis, present additional challenges to increasing housing opportunities for low-income households.

**AP-35: Projects for City of Newton & WestMetro HOME Consortium for FY23**

Project Name	Target Area (if applicable)	Priority Needs Addressed	Project Description	Estimated Funding Allocation	Target Date of Completion	Estimate the number and type of families that will benefit from the proposed activities:	Planned Activities:
Housing Rehabilitation and Development	City-wide	Affordable housing - rehab of existing units; Affordable housing acquisition of existing units; Affordable housing - production of new units	CDBG funds will be used for: 1. rehabilitation of owner-occupied one- and two-family residential structures, owner-occupied condominium units and rental units owned by the Newton Housing Authority and nonprofit affordable housing development organizations and providers; 2. acquisition of housing units for permanently restricted affordable housing; 3. write down of mortgages for the purpose of creating permanently restricted affordable housing; and 4. preservation of existing affordable housing.	\$1,294,408.60	6/30/2023	70	Rehabilitation of capital improvements to rental housing acquired by the Newton Housing Authority from CAN-DO and rehabilitation of income-eligible homeowner units.
Public Services	City-wide	Human services	Funds for public services for low- and moderate-income Newton residents focusing on the following populations: children and youth, disabled adults, adults and families, and elderly. Funding is comprised of 15% of FY23 CDBG Entitlement funds (\$290,258) plus 15% of FY22 program income (\$4,742.00) and FY23 estimated program income (8,250).	\$289,250.00	6/30/2023	734	The Human Service Grant will fund 14 public agencies and organizations to provide services to children and youth, persons with disabilities, survivors of domestic violence, adults and families, and elderly.
Accessibility Improvements	City-wide	Architectural access	Funds for the creation of two accessible crossings at the three way intersection of Langley Road, Warren Street and Chase Street.	\$90,500.00	6/30/2023	453	Accessible crossings.
CDBG Program Management	City-wide	Affordable housing - rehab of existing units; Affordable housing acquisition of existing units; Affordable housing - production of new units; Human services; Architectural access, Fair housing	Funds for the management and implementation of the CDBG program including citizen participation and program delivery in support of preservation, rehabilitation, and development of affordable housing.	\$385,079.00	6/30/2023	N/A	Administrative services and costs.
HOME Administration	City-wide	Tenant Based Rental Assistance; Housing Rehabilitation; Production of Rental Units	Funds for the administration of the WestMetro HOME Consortium, which is equal to 10% of the annual allocation. Seven percent of the allocation goes to local communities for administration of their projects. Three percent of the allocation is set aside for general Consortium administration and compliance.	\$196,558.80	6/30/2023	N/A	Administrative services and costs.
HOME Tenant-Based Rental Assistance	N/A	Tenant Based Rental Assistance	Funds to provide income-eligible renters with rent and/or security deposit assistance.	\$1,016,776.82	6/30/2023	22	TBD
HOME Rehabilitation	N/A	Housing Rehabilitation	Funds for the rehabilitation of affordable rental units and income-eligible homeowner units.	\$1,722,547.09	6/30/2023	0	TBD
HOME Production of Affordable Housing		Production of Rental Units	Funds to be used for the construction of affordable housing in the Consortium	\$1,427,969.34	6/30/2023	0	TBD
HOME CHDO Operating Expenses	N/A	Production of Rental Units; Housing Rehabilitation	Funds for operational expenses for Community Housing Organizations operating in the WestMetro HOME Consortium.	\$130,916.90	6/30/2023	1	Administrative services and costs.
HOME CHDO Set-Aside	N/A	Production of Rental Units; Housing Rehabilitation	Funds for the creation and/or rehabilitation of affordable housing units by Community Housing Organizations operating in the WestMetro HOME Consortium.	\$466,530.45	6/30/2023	0	CHDO projects are determined by an annual HOME RFP generally released in the fall.
ESG23 Newton (FY22)	N/A	Homelessness - emergency shelter/transitional housing; Homeless - prevention, Homelessness - rapid re-housing	Funds for the City of Newton are planned to operate shelters for the homeless, conduct street outreach activities, promote rapid rehousing and provide homelessness prevention as well as support program administration.	\$164,000.00	6/30/2023	127	Activities will include shelter services and homelessness prevention as well as support program administration.

## **AP-50 Geographic Distribution - 91.420, 91.220(f)**

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

As the Community Development Block Grant (CDBG) is intended to predominantly serve low- to moderate-income residents, CDBG funding is allocated to projects that are either within CDBG eligible areas or to those that directly impact low-to-moderate income beneficiaries. However, in the FY21-26 Consolidated Plan, geography was not used to determine funding allocation priorities, nor were target areas identified in the City's Strategic Plan.

The City anticipates continuing to focus its investment in housing rehabilitation and development over the next program year to better address the escalating need for safe, decent and affordable housing. Affordable housing rehabilitation and development will directly benefit low-to-moderate income households, and accordingly, can be distributed city-wide. Approximately \$1,165,122 will be available to allocate on a rolling basis toward FY23 affordable housing projects.

### **2. Rationale for the priorities for allocating investments geographically**

Given the increasing need for affordable housing, the City will be allocating the majority of its CDBG funds towards housing rehabilitation and affordable housing development during the July 1, 2022 - June 30, 2023 program year. These investments can be made city-wide to benefit low-to-moderate income households throughout Newton, rather than directed geographically towards specific target areas.

# AFFORDABLE HOUSING

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

### 1. Introduction

In FY23 (FFY22), CBDG and HOME funding allocated to the City of Newton will continue to be used for a variety of programs and activities to preserve and expand affordable housing opportunities across the City. The Division seeks to identify projects that align with priority needs outlined in the FY21-FY25 Consolidated Plan and increase the stock of accessible and visitable housing. The City will continue to support the creation of nine units of permanent supportive housing for chronically homeless adults with disabilities. These units, along with 59 other affordable units for seniors, will be incorporated into the expansion of 2LifeCommunities' existing Golda Meir House, which already includes 199 units of affordable senior housing with extensive programming and services.

The 2Life Communities' Golda Meir House Expansion Project, which will convert underutilized, municipal land into affordable housing, is expected to be complete in the Fall of 2023. This project originated in September 2017, when Newton issued a Request for Proposals for the reuse of the city-owned water tower site on Stanton Avenue, which directly abuts the Golda Meir House. The following month, the City selected 2LifeCommunities' proposal and committed to sell this publicly owned land to 2LifeCommunities in order to connect the old and new buildings into one vibrant affordable housing community. FY18, FY20 and FY21 HOME funds were awarded to support the new construction of 68 affordable rental units for seniors with incomes ranging from 30 up to 99 percent Area Median Income, including 9 units for chronically homeless adults with disabilities. To successfully provide permanent supportive housing, 2Life Communities partnered with Hearth, Inc., a nonprofit organization dedicated to the elimination of homelessness among the elderly through prevention, placement, and housing programs.

Housing Division staff have played a crucial role in the progress of this project and will continue to oversee the development process on behalf of the City. 2LifeCommunities received a Chapter 40B Comprehensive Permit from the Newton Zoning Board of Appeals in December 2018 and was awarded a Low Income Housing Tax Credit award from the Massachusetts Department of Housing & Community Development (DHCD) and Section 202 funding from HUD. The project financing was closed in August, 2021 and construction is anticipated to begin in the Spring of 2021.

In FY20, the City awarded approval of CBDG funds to the Newton Housing Authority's (NHA) Haywood House project, which will create 55 new affordable rental units for seniors. The income eligibility will range from 30 to 99 percent AMI. Three of the units will be fully accessible and four units will be designated for households that have been homeless or are at risk of

homelessness. The project will also include two elevators and community space for supportive services. The NHA received a Comprehensive Permit in July 2018 and was awarded Low Income Housing Tax Credits from the Massachusetts Department of Housing & Community Development in February of 2020. Construction on Haywood House began in late FY21 and is expected to be complete in the Fall of 2023.

In FY23, the City will continue to advance the CAN-DO Acquisition and Preservation project through the second phase: property rehabilitation. In FY20 (FFY19), the Newton Housing Authority received funding approval from the City's Planning & Development Board and Community Preservation Committee to acquire and preserve the CAN-DO affordable housing portfolio of 33 units across 12 scattered sites in Newton. The affordability of the housing was placed in jeopardy when CAN-DO disaffiliated from its management partner, Metro West Collaborative Development, in 2018. In FY21 (FFY20), the Newton Housing Authority officially closed on the acquisition of the portfolio. During the closing process, CAN-DO added an additional property, (236 Auburn Street) to the sites to be acquired by the NHA. This increased the acquisition to 36 units across 13 scattered sites, 33 units of which were financed by CDBG funds. Once the acquisition and debt reduction was complete in FY21, the City began to rehabilitate the properties, prioritizing the units with the greatest infrastructure and safety needs. This rehabilitation commenced in FY21 and will continue throughout FY23.

In addition to the preservation of the CAN-DO portfolio, the City will also preserve affordable senior housing at 2Life Communities' Coleman House with FY21 CDBG funds and a pre-commitment of FY22 HOME funds. The funds will be used to conduct a comprehensive rehabilitation to the building's mechanical systems and infrastructure, as well as accessibility design upgrades to each of the 146 units. The improvements will make the project more efficient and environmentally sustainable for the next several decades, as well as improving the quality of life for senior residents. Construction began in the Summer of 2021 and will continue through FY23.

Finally, Newton will continue to push forward the redevelopment of the West Newton Armory site on Washington Street into 100% affordable housing. As an awardee of a \$200,000 Housing Choice Grant from the Department of Housing & Community Development (DHCD), the City hired an affordable housing consultant in FY21 to conduct a predevelopment feasibility study on the site. Concurrently, as part of the City's Real Property Reuse process, the West Newton Armory Joint Advisory Planning Group (JAPG), consisting of nine community members, analyzed the property and its redevelopment potential over the course of eleven months. Following the completion of the consultant's study and the JAPG's report, the City Council unanimously recommended to the Mayor that the City purchase the Armory for \$1 from the State for its redevelopment into 100% affordable housing. Newton took ownership of the Armory in the Fall of 2021, and selected Metro West Collaborative Development/Civico through an RFP process, to partner with the City in the redevelopment of the site. The Metro West/Civico proposal includes 43 units of intergenerational housing affordable to households earning 30-60% of the Area Median Income. The project is anticipated to be complete in FY25. At a public hearing in April, the Planning and Development Board will vote on the pre-commitment of future years'

CDBG and HOME funding, and the City's Inclusionary Zoning funds, to develop the Armory into affordable housing with supportive services.

In FY23 (FFY22), the City will administer programs that were successful in FY22 (FFY21) as well as develop and administer new programs which support housing opportunities in Newton:

- The City will make CDBG and HOME funds available for the rehabilitation and creation of new affordable rental units. A priority in FY23 will be continuing to assist the NHA to rehabilitate 16-units of the CAN-DO housing portfolio. The NHA and the City will also work together to identify HOME and CDBG eligible rehabilitation projects to address some of the significant needs revealed by the Authority's capital needs assessment. In addition, the City will strengthen its relationship with existing housing providers in order to support diverse housing choices in Newton.
- Staff will continue to market and administer the Housing Rehabilitation program, which provides homeowners and qualifying nonprofit organizations with deferred payment loans for repairs and improvements aimed at addressing issues related to health, safety, and building code violations. The Division anticipates that 16 (NHA) units will be rehabilitated in FY23 (FFY22). Over the past years, the City has expanded the allowable scope of work available through the Housing Rehabilitation program for the Newton Housing Authority and other nonprofit housing organization projects, in order to more comprehensively address critical repairs for health and human safety. Previously, eligible work was limited solely to accessibility improvements.
- In FY23, the City will work with the WestMetro HOME Consortium to implement the strategies of the WestMetro HOME Consortium Analysis of Impediments to Fair Housing Choice. These strategies are expounded on in the Barriers to Affordable Housing section.

#### *Consortium Communities*

The Town of Bedford plans to assist at least two households with HOME funded rental assistance in FY23. Bedford has several new housing development projects in the pipeline that will include affordable units. The Merriam Farm, a new rental housing project, will have four affordable units. The Town has 981 units or 18.43% of its housing included in the Commonwealth's Subsidized Housing Inventory (SHI). Of the 981 units on the SHI, 400 are market rate. Of those remaining 581, 61 are ownership, 80 are age-restricted rental, 230 non age-restricted rental, and 210 are specialized rentals.

The Town of Brookline actively supports the production and preservation of affordable housing projects through the Housing Advisory Board and Community Planning staff.

- Brookline is now concluding the 30B process of selecting a developer to develop and manage a rental senior housing project (62+) at the Kent/Station Street Town-owned



parking lot. The plan is to report to the Select Board in 2022 and consider additional American Rescue Plan Act (ARPA) funding for this project.

- Brookline processes a number of 40B Comprehensive Permit projects, which will add a significant number of affordable units to Brookline's housing stock. Currently the subsidized housing inventory is 23 units short of the 10% threshold. An updated count of year-round housing units, through 2020 Census data, will be available in late 2022.
- Brookline's Public Housing Authority continues its multi-year strategic preservation initiative that will rehabilitate and preserve its six federal housing developments (containing 438 affordable units) through the HUD Rental Assistance Demonstration (RAD) program, with state and local support.
- The Community Preservation Act will activate and provide a significant stream of funds for the production and preservation of new affordable housing projects. Program administration and design is underway for full implementation in FY23.
- Finally, the Town of Brookline continues to administer its Inclusionary Zoning Bylaw which applies to any project containing four or more newly constructed dwelling units, as recently amended.

The Town of Concord has a history of supporting efforts to establish and maintain affordable housing. Concord is in process of committing \$655,743 in FY19, FY20, FY21, FY22, and FY23 local and Consolidated Pool HOME funds to the Christopher Heights (also known as the Junction Village) development. In addition, \$116,345 in FY21 and FY22 HOME funds that were originally allocated to the Concord Housing Authority's 367 Commonwealth Avenue project will now be used for the Christopher Heights development. The CHA's project was cancelled due to an increase in construction costs. The Christopher Heights project leverages \$3,000,000 in local funds and additional state and federal funding for the construction of 83 new deed-restricted units of assisted living with five local HOME assisted units. Construction is anticipated to be underway in FY23.

In FY23, the City of Framingham's Community Development Department will launch partnerships and initiatives that support the development and preservation of affordable housing. The Department maintains this practice to remove barriers for residents unable to afford the rising costs of market rate units. For the next year, the City plans to prioritize HOME fund use for projects that provide service-enriched housing as well as decrease homelessness for families and individuals. Through this approach, the City addresses the needs of low- and moderate-income residents coping with food insecurity, lack of transportation access, health care system entry challenges, and other issues. The City is continuing to work with the Framingham Housing Authority to redevelop 132 units in the Carlson Crossing Project.

While no projects or programs are identified in this year's Annual Action Plan, Lexington staff continues to work with the Lexington Housing Assistance Board (LexHAB) and the Lexington Housing Authority to identify potential projects. LexHAB is developing affordable housing at 116 Vine Street (Leary Farm). The project proposal is for six units, with construction anticipated for 2022 to 2023. The Lexington Housing Authority (LHA) continues to plan for capital improvement projects that ensure the preservation and long term viability of their affordable housing

portfolio. The LHA accesses both federal funds and state formula funding to supplement housing authority funds for these projects.

The Natick Affordable Housing Trust (NAHT) continues to fund a new Tenant-Based Rental Assistance service offered by the Natick Service Council (NSC), a pilot program started in FY21. Town staff is working with NSC to reorient the program to prevent homelessness, rather than helping homeless families with security deposits. The NAHT will explore partnering with a nonprofit to use HOME funds to start a critical Housing Rehabilitation program for income-eligible households.

In November of 2020, Needham launched an Emergency Rental Assistance Program funded through the CPA and a grant from the Massachusetts COVID-19 Relief Fund. The program offered eligible residents (earning 80% of the AMI) assistance covering 50 percent of their rent, up to \$1,500 per month, for up to three months. To date, the program has supported a total of 23 households.

Most recently, the Needham Planning Board appointed a working group of representatives of local boards and committees as well as three citizens to prepare a Housing Plan. Since the Town's current housing plan was approved in 2007, it has made considerable progress in producing affordable housing by adding 894 new units to its Subsidized Housing Inventory (SHI) and surpassing the state affordability goal of 10%. Despite reaching this threshold, the Town recognizes that significant unmet housing needs remain in the community, particularly in the context of unprecedented housing prices and the pandemic. The Town expects to have a plan in place by September 2022.

Waltham's Inclusionary Zoning special permit process has approved two affordable 80% AMI rental units. These units include 99 Moody Street, which is being leased through a lottery, and 185 Willow Street, which is currently under construction. Two 40B developments, 241 Second Avenue and 305 Winter Street, were recently approved to include units affordable to households at 60% of the AMI. The City continues to provide a CARES COVID Emergency Assistance program to assist moderate income households in preventing eviction.

The Watertown City Council adopted new five-year housing plan in March 2021. The plan contains goals and strategies to create and preserve affordable housing for various income levels (below 80% area median income and below 60% area median income) and for seniors and individuals with a disability. One of the plan's themes is creating a pipeline of 100% affordable or mixed-income projects since virtually all of the City's new affordable units have been generated by its Inclusionary Zoning requirements and production of substantial amounts of multifamily housing. In November 2021, the Council approved the formation of a municipal affordable housing trust to help create and preserve affordable housing. The city manager, who will be one of the seven trustees, must appoint the remaining trustees to complete the trust's formation.

In September 2021, the Watertown City Council authorized a study to determine how financial contributions from commercial developers may be used to offset the cost of an unmet need for affordable housing generated by commercial projects. The study is expected to conclude in the Spring of 2022 and may form the basis for proposing a “linkage fee” for commercial development.

In FY23, The Town of Wayland will continue to make progress on efforts to developing River’s Edge, a previously town-owned parcel on Route 20. Construction is underway at the site to build 218 multi-family residential units. Fifty-five of the units will be designated as affordable and a portion of the project will be age-restricted. This development, Rivers Edge, will serve the need of low-moderate income families and add housing choices for the increasing senior population in Wayland.

<b>One Year Goals for the Number of Households to be Supported (By Population Type)</b>	
<b>Population Type</b>	<b>Number of Households</b>
Homeless (units reserved for homeless individuals and/or households):	5
Non-Homeless (for all units NOT reserved for homeless individuals and/or households):	76
Special-Needs (units reserved for households that are not homeless but require specialized housing or supportive services)	51
<b>Total (Consortium-wide) &gt;&gt;&gt;&gt;</b>	<b>132</b>

<b>One Year Goals for the Number of Households Supported Through (By Program Type)</b>	
<b>Program Type</b>	<b>Number of Households</b>
Rental Assistance (for programs such as TBRA and one-time payments to prevent homelessness):	22
The Production of New Units (construction of new units, including conversion of non-residential properties):	55
Rehab of Existing Units (including reconstruction):	19
Acquisition of Existing Units (for programs such as downpayment assistance):	36
<b>Total (Consortium-wide)&gt;&gt;&gt;&gt;</b>	<b>132</b>

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

### 1. Actions planned during the next year to address the needs to public housing

In FY21, the Newton Housing Authority (NHA) acquired 36 additional units of affordable housing. The NHA is focused on providing robust resident services to the existing residents of these properties. CDBG funds are also being utilized to complete capital improvements to the units in partnership with the City of Newton Department of Planning and Development.

In FY22, the NHA will complete the construction of Haywood House, a 55-unit affordable housing development for seniors. With its property manager, Maloney Properties, the NHA will hold a lottery for tenants. Full occupancy is expected during the beginning of FY23.

The Housing Authority maintains an additional 57 units of rental housing known as its Management Program (93 units in total, including the 36 CAN-DO units), which are all managed as affordable housing for individuals and families with low incomes. Unlike the NHA's public housing, this portfolio does not receive any subsidy or capital funds from HUD or DHCD. The NHA has used its own operating funds and occasional grants to maintain these properties throughout Newton. In 2019, the NHA commissioned a capital needs assessment of its 57 Management Program rental units at 13 properties. The assessment revealed significant needs at several properties, totaling \$2,924,044 in recommended first year expenditures alone. The NHA has undertaken some of the recommended improvements but does not have adequate resources to address all of the recommendations in the capital needs assessment. In FY23, the City will work with the NHA to identify CDBG and HOME eligible rehabilitation projects to support the preservation of these important affordable units.

Throughout all of its housing programs, the NHA strives to provide tenants with resident services and social programming to meet their needs, using available grant funds and donations. In FY23, the NHA will continue to complete capital improvements to its properties according to its long-term capital plan; focusing first on health and safety improvements, building systems, and building envelope.

#### *Consortium Communities*

In FY23 (FFY22), the Bedford Housing Authority will continue its social service program to connect families to the resources necessary to stabilize their living situation and improve their quality of life. The program will provide financial literacy education, skill training, career coaching, and other support services to a maximum of 15 low-income households currently residing in Bedford Housing Authority units.

In the Fall of 2021, the Belmont Housing Authority was awarded a CPA grant to explore redevelopment opportunities at its state-aided family development. The Belmont Housing Authority will contract with the Cambridge Housing Authority and their highly successful Planning and Development Department to develop a master plan for that site. The Cambridge Housing Authority will assume the remaining planning responsibilities to assess redevelopment

opportunities at the state-aided elderly/disabled development, using previously awarded CPA funds.

In FY23, the Town of Brookline will work with the Brookline Housing Authority (BHA) on its multi-year Strategic Preservation Initiative. This project will take advantage of HUD's Rental Assistance Demonstration Program as well as federal and state tax credits and state and local subsidies, to rehabilitate and preserve 497 units of affordable public housing units in six different properties. In FY20 the BHA began construction on Phase 1, a 99 unit property (O'Shea) serving low- and extremely low-income seniors. The BHA also obtained a commitment from the Town of \$1.35 million, including \$452,927 in FY20 HOME and program income funds, for the first of its Phase II projects; a 99-unit senior property at 90 Longwood Avenue (Morse). In FY23, the Town will work with the Housing Authority to permit and fund a third project located at 32 Marion Street. This 40B project will completely modernize and expand an obsolete 60-unit development into a 139-unit project that will be built over two phases. This final project, which will utilize both town-controlled and state subsidies, is expected to begin construction in 2022.

In FY20, the Framingham Housing Authority (FHA) announced plans for a major overhaul of its housing portfolio. Since then the agency has been working to secure the necessary financing for the project. Some FHA sites are located in Opportunity Zones, which allows the potential use of traditional and non-traditional investment streams for financing. The Community Development Department expects HOME funds to be among the many sources used to support this major rehabilitation initiative. The upcoming redevelopment of 132 units in Carlson Crossing will be located in this zone.

In FY23 (FFY22) the Lexington Housing Authority will proactively program capital needs projects to ensure their portfolio of housing provides safe, stable, quality affordable housing for low and moderate income households.

The Natick Housing Authority is developing comprehensive renovation and development plans with municipal staff and the Natick Affordable Housing Trust, using funds from a variety of sources. Attention is being focused on adding accessible units at the Cedar Gardens family housing development.

Though not yet ready for funding in FY23 (FFY22), the Town of Needham continues to work with the Needham Housing Authority (NHA) on plans to modernize or redevelop existing properties and potentially develop new units on NHA-owned property. The NHA hired the Cambridge Housing Authority (CHA) as a consultant to provide guidance on the most appropriate sources of refinancing and is in the early stages of this work. The Town is holding Community Preservation funds in reserve for the support of such a project(s), and it is anticipated that HOME funding would be a source of financing.

In 2022, Waltham will commit \$400,000 in HOME funds and \$400,000 in CDBG funds for accessibility improvements at the Beaverbrook Apartments, a 60-unit elderly apartment

development owned by the Waltham Housing Authority.

The Watertown Housing Authority is working with HUD to “reposition” its 50 federal public housing units using Section 18 of the Federal Housing Act of 1937 (42 U.S.C. § 1437p). In October 2021, HUD approved converting these units into 50 Section 8 vouchers and the repositioning will likely become effective during the first half of 2022. During FY23, the WHA will continue planning for use of the new resources to provide long-term sustainability for this wing of the E. Joyce Munger Apartments and therefore benefit its tenants. In November 2021, the WHA received zoning approval for three building additions/site improvements to provide handicap-accessible living and community spaces in the McSherry Gardens 40-unit complex. The WHA will be advancing this project during FY23. Finally, the WHA applied for up to \$1.5 million in CPA funds to create special needs housing units on vacant land at 103 Nichols Avenue. If the WHA is able to obtain a CPA award, it will be able to move forward on this project in the next fiscal year.

In FY23, the Wayland Housing Authority, working with Town, will be an active partner in administering the HOME-funded TBRA program, providing security deposit assistance to income eligible households.

## **2. Actions to encourage public housing residents to become more involved in management and participate in homeownership**

The Newton Housing Authority’s Resident Advisory Board includes tenants from each of the NHA’s housing programs. These residents meet monthly to discuss the resident experience and to provide feedback to NHA. In addition, the Resident Services Department conducted a survey in 2021. This survey collected feedback from residents, including their suggestions for future programming and improvements. In FY23 and going forward, the NHA will utilize this tenant feedback in its planning processes and will continue to engage residents.

The Newton Housing Authority does not participate in any homeownership programs. However, information about new homeownership opportunities created through the City of Newton Homebuyer Assistance program will be disseminated to NHA tenants.

### *Consortium Communities*

The Bedford, Concord, Lexington, Needham and Sudbury Housing Authorities engage tenant groups to provide feedback on general administration issues and policy decisions

The Belmont Housing Authority entered into a management contract with the Cambridge Housing Authority in the Summer of 2020. Under this new administration, the Housing Authority is working closely with the newly formed tenant association to expand tenant opportunities, which will include offering information on local home-ownership programs.

In Brookline, as affordable homeownership unit becomes available through turnover, the Housing Division administers the resale process through lotteries and engages underserved

communities, minorities, and residents of the housing authority in extensive outreach for participation and inclusion. Public housing tenants interested in homeownership opportunities are notified through the Housing Authority or by signing up for the Town's affordable housing listserv. A number of public housing tenants have taken advantage of these opportunities in the past.

Brookline's Housing Authority tenant association provides ongoing support of the BHA's efforts to create and maintain quality housing, to strengthen social service programming, and increase self-sufficiency opportunities. The BHA works with the tenant association to foster communication with residents with respect to initiatives, policies and practices. The BHA encourages residents to become actively involved and to challenge BHA's management with independent ideas and concerns. Recently the Town passed a bylaw to include the addition of two low-income tenants, including those who live in BHA properties, as members of the Housing Advisory Board. One current BHA resident already sits on this policy board as a tenant representative.

The Framingham Housing Authority (FHA) offers various opportunities for its residents to become homeowners or participate in management that the Community Development Program fully supports. An example is FHA's Family Self-Sufficiency (FSS) program, which is a voluntary service that encourages FHA residents, both Section 8 and Public Housing, to work towards becoming financially independent by maintaining a savings account for five years. FSS diverts funds from rent increases into an account for the participant household. At the five-year mark, residents use the funds to accomplish a long-term goal, such as purchasing a home, paying for school or becoming debt free. The Community Development Program supports FSS participating residents and other FHA residents by notifying them of homeownership, rental, employment, Section 3 and community development opportunities as well as committee meetings through various outreach outlets.

Tenants of the Natick Housing Authority (NHA) have many opportunities to help govern the agency. Currently the Authority is holding elections for the Cedar Gardens Tenants Organization in March of 2021. The NHA's Board of Directors includes a tenant representative.

The Needham Housing Authority is in the process of determining how best to refinance properties to make important capital improvements and potentially increase the number of housing units. The Cambridge Housing Authority has been brought on to assist in the analysis of the best approaches for undertaking this work. Resident input will be a critical component in this decision-making process.

Waltham residents may participate in the management and operations of the Waltham Housing Authority (WHA). The WHA is required to have one of its residents sit on its Board of Governors. That person has one of five votes to determine policy and procedures for the WHA and presumably represents residents' interests in the decision-making process. Additionally, the WHA maintains a Resident Advisory Board, comprised of federal public housing residents and Section 8 participants. This Board meets twice a year to discuss proposed capital improvement

projects and the application of federal funds. At these meetings, the residents have an opportunity to make proposals regarding the use of funds for the needs of the residents. Finally, the Board of Governors provides an opportunity for residents to address the Board at monthly meetings by setting aside some time on the agenda for discussion of resident issues. Resident associations are encouraged to attend the meetings and bring forward any residential community issues.

The Watertown Housing Authority has an active Local Tenant Association (LTO) and Resident Advisory Boards (RABs) in the family and elderly developments. The Authority communicates all capital needs plans and operational issues to all the resident groups. In 2022, the Authority will complete a state-of-the-art learning center located at Lexington Gardens for its family residents. The learning center will provide programming for children while also training adults to lower their debt, improve their credit score, and increase overall household income, with the goal of helping families move-out of public housing.

The Wayland Housing Authority (WHA) works to facilitate tenant participation in WHA operations. The WHA continues to encourage tenant participation in newsletters and the tenant handbook. Staff meets with tenant groups on a regular basis or as needed, and tenants serve on the WHA board.

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



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

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

### **1. Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

Annually, the City of Newton convenes the representatives of the former BNWW CoC, including local providers and municipal staff, and representatives from the BoS CoC to discuss the needs of the homeless population and how ESG funds can be best allocated to address those needs. On December 8, 2021, the cohort finalized FY23 (FFY2022) ESG funding priorities across the five eligible components, including street outreach, emergency shelter, homelessness prevention, rapid re-housing, and HMIS.

Consistent with existing needs and the impacts of the coronavirus pandemic, HUD priorities, evaluation of ongoing programming, and recommendations from the CoC and local providers, Division staff allocated 16.5% and 16% of FY23 ESG funds towards homelessness prevention and rapid re-housing activities respectively. Homelessness prevention activities have proven to be a successful and effective method to avert homelessness. With a combination of financial assistance and case management, not only do individuals and families stay housed but they are moving towards stability for the long term. Furthermore, rapid re-housing activities provide the much-needed assistance to close the gap and break down barriers that prevent homeless individuals and families from moving into permanent housing. The City's ESG funds will be supplemented with other state and federal resources, including the Residential Assistance for Families in Transition (RAFT) and Emergency Rental and Mortgage Assistance (ERMA) programs. Brookline Community Mental Health Center will implement homelessness prevention and rapid re-housing activities for FY23.

Furthermore, while Division staff did not allocate FY23 ESG funds towards Street Outreach activities, the City of Newton and neighboring communities continue to build a strong network of resources to collaborate and ensure unsheltered individuals and families are engaged and connected to the services that they need. As a result, the City of Newton will continue to partner with the Community Day Center of Waltham (CDCW) to engage these unsheltered individuals. Under the Emergency Shelter component, the CDCW is awarded FY23 ESG funds to continue the operation of its day center and winter warming center, which provide a gathering space for individuals to receive a hot lunch, basic hygienic and medical needs, access to computers, case management, counseling, and referrals to detox facilities and other appropriate service providers.

### *Consortium Communities*

In 2014 the Natick Affordable Housing Trust established an Emergency Homeless Voucher program for homeless individuals on the streets during inclement weather. The voucher program provides for several nights of housing in a local hotel with the condition the individual seek assistance from the Natick Service Council (NSC). The recipients of the voucher are usually picked up and assisted first by the Natick Police, who gather information, run a background check, notify the Council, and provide a ride and the voucher to a local motel. The NSC will pick up the voucher recipient the next day for further assistance. This program successfully assisted several homeless households in FY22, and the Trust will continue its operations in FY23.

The combined efforts made between the City of Waltham Public Health and Housing Department, the Waltham Police Homeless Task Force, and the Community Day Center of Waltham provide outreach and an assessment of the needs of the homeless population, including unsheltered persons. The Waltham Homeless Coalition, spearheaded by the police department, convenes monthly to share resources that are aimed at helping Waltham homeless persons.

Annually, the City of Waltham allocates \$100,000 for a winter warming center for unsheltered homeless who cannot qualify for Massachusetts Housing & Shelter Alliance (MHSA) services due to substance abuse and or criminal activity. Guests of the warming shelter are triaged and provided with case management. In addition, the shelters administered by Middlesex Human Service Agency, located in Waltham, provides overnight shelter, meals and bathroom/shower facilities, while engaging homeless persons in case management to work towards permanent housing. The MHSA shelter remains open during the day for the third consecutive winter due to COVID.

## **2. Addressing the emergency shelter and transitional housing needs of homeless persons**

The United States Interagency Council on Homelessness and the BoS CoC have established strategic goals to end and prevent homelessness, particularly among the veteran, family, youth, and chronically homeless populations. Division staff utilizes ESG funds to support various shelter services, including those for survivors of domestic violence and men's and women's emergency shelters.

The Second Step, REACH Beyond Domestic Violence, and the Middlesex Human Service Agency provide critical emergency and transitional housing for the BNWW region. ESG funds are also awarded to the only day shelter in Waltham, Community Day Center of Waltham. As previously mentioned, the Community Day Center of Waltham provides a gathering space for individuals to receive a hot lunch, basic hygienic and medical needs, access to computers, case management, counseling, and referrals to detox facilities and other appropriate service providers.

This ESG funding source serves as a valuable resource for these emergency shelter providers, especially since these types of projects are not eligible to receive McKinney-Vento Act funds. In addition, it is critical to support these emergency and transitional shelters as few exist in the BNWW region. Most other shelters are located in Boston, which is a far travel for many homeless individuals and families. Without these emergency shelter providers in the BNWW region, many homeless individuals and families would be otherwise unsheltered. As a result, In FY21 (FFY20), as a direct response to the coronavirus pandemic, the Community Day Center of Waltham acquired the building adjacent to its Day Center and with the City of Newton's ESG-CV funds, is renovating the building to serve as a winter warming center and an extension of the Center. Due to the coronavirus pandemic, the emergency shelters in the region reduced capacity to 50% to adhere to social distancing guidelines, leaving many more homeless individuals unsheltered. The Community Day Center of Waltham's winter warming center will add much-needed beds in the region. Finally, the Pine Street Inn, though not funded by ESG, also operates several projects within the BoS CoC and manages an experienced outreach team that engages those unable or unwilling to enter a shelter. Pine Street Inn staff provides these individuals with referral information, food, clothing, hygiene products, and blankets.

On February 23, 2022, the BoC CoC, in coordination with several agencies from the former BNWW CoC, completed the 2022 Point-in Time Count (PITC). Although there is a clear need and benefit of providing shelter services, particularly in the midst of the coronavirus pandemic, Division staff continues to strike a balance in allocating ESG funds between emergency shelter, homelessness prevention, and rapid re-housing activities, which can help reduce the number of individuals and families experiencing homelessness and the duration of the homelessness. The BoS CoC must strive for permanent housing stability in order to effectively end homelessness.

#### *Consortium Communities*

The City of Framingham works with Family Promise Metrowest in Natick to provide HOME funded TBRA rental vouchers to their clients who want to live in Framingham. Family Promise Metrowest is a family homeless provider working with families not always eligible for shelter placement through DHCD. This successful partnership provides a year's worth of rental subsidies in exchange for the clients obtaining extensive case management services from Family Promise.

The Natick Affordable Housing Trust will continue to use HOME funds for Tenant Based Rental Assistance in FY23. This assistance is provided to households at several income levels, including those families transitioning from homeless assistance to more independent living.

The City of Waltham focuses resources on providing rapid rehousing services to decrease the number of unsheltered people who are unable to reside in the current transitional shelter beds in the City, due to substance abuse and or criminal behavior. The HOME TBRA program can bridge the homeless individual into public housing with a rental subsidy based on the Waltham Housing Authority rent standard. The Community Day Center, the Waltham Police Homeless Task Force and MHSa Shelter collaborate to refer homeless individuals to the TBRA Program and maintain a proactive approach in providing continued support for the client. Current efforts

continue to be made with CARES Act funding for rental assistance helping applicants to maintain housing for low to moderate income renters during COVID thereby reducing homelessness.

- 3. 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.**

ESG funds continue to be allocated toward homelessness prevention and rapid re-housing activities to assist homeless individuals and families and those who are at-risk of homelessness in the BNWW region. Homelessness prevention and rapid re-housing activities stabilizes individuals and moves them towards permanent housing and independent living. Activities include rental assistance (short- and medium-term rental assistance), financial assistance (rental application fees, security deposits, last month's rent, utility deposits, utility payments, moving costs), and services (housing search and placement, housing stability case management, mediation, legal services, and credit repair).

In July 2019, the City of Newton's City Council passed the updated Inclusionary Zoning Ordinance, which includes the Extremely Low-Income (ELI) Alternative Compliance Option. The ELI option allows a developer to seek a special permit to reduce its total percentage of required Inclusionary Units. Under the new Inclusionary Zoning Ordinance, any project that includes the construction of twenty-one or more new rental units must set aside 17.5% of its total units as affordable units (including 2.5% middle-income units). However, the developer may seek a special permit to alternatively set aside 12.5% of its total units as affordable units under the ELI option.

To undertake the ELI option, the developer must provide and cover all costs associated with offering ongoing, regular on-site support services for households residing in the ELI units, which are set at 30% AMI. The ELI option is a result of the City of Newton's emphasis on creating permanent affordable housing with supportive services to ensure the City's most vulnerable population is stably housed, has increased economic security, and improved health.

The following table details the breakdown of the 12.5% affordability requirement under this ELI option:

<b>Extremely Low-Income Alternative Compliance Option: Number of Inclusionary Units Required</b>	
<b>Tier Level</b>	21+ UNITS
<b>ELI Tier: 30% AMI</b>	2.5%
<b>Tier 1: 50%-80% AMI</b>	7.5%
<b>Tier 2: 110% AMI</b>	2.5%
<b>Total</b>	12.5%

*Source: City of Newton's Zoning Ordinance, Chapter 30*

The City of Framingham continues to work with Family Promise Metrowest to provide services to Framingham residents who are at risk of becoming homeless. Family Promise Metrowest has a diversion program to assist residents who are at risk of becoming homeless with financial and/or other services.

Waltham will continue to refer very-low income individuals and families to social service agencies that maximize rapid re-housing services to shorten the length of time persons experiencing homelessness stay in emergency shelters and provide case management to give households the opportunity to access any services needed in order to retain permanent housing.

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

The City of Newton's ESG homeless prevention program funds are intended to prevent low-income individuals and families from moving into emergency shelters or living in a public or private place not meant for human habilitation. Funds can be utilized for rental assistance (short- or medium-term rental assistance), financial assistance (application fees, security deposits, last month's rent, utility deposits, or moving costs), or service costs (housing search and placement, legal services, or credit repair). The City of Newton continues to target its ESG funds towards homelessness prevention programs and collaborate with the McKinney Vento Liaison to ensure low-income individuals and families are receiving the support that they need to avoid homelessness. Furthermore, the City will continue to facilitate referrals between ESG providers to non-ESG providers to ensure resources are available to all in the jurisdiction.

*Consortium Communities*

In FY23, the City of Framingham will use CARES Act funds to assist eligible residents with three months of emergency rental assistance. HOME Tenant Based Rental Assistance full rental assistance will also be provided to eligible homeless families referred from Family Promise

Metrowest. Additionally, the City will assist households facing eviction who are able to pay rent moving forward, but need assistance with rent arrears. The Housing Department coordinates with the Department of Transitional Assistance to help facilitate emergency Residential Assistance for Families in Transition (RAFT) funding, to be used in conjunction with City of Framingham CARES Act funds. The program includes collaborations such as the Metrowest Health Foundation, Framingham Community Partners (a collaboration between the Framingham Public Schools and other non-profits to address social service related issues), and the Metrowest Legal Services and Metrowest Mediation Services forged to find ways to prevent homelessness.

The Natick Service Council helps low income families through eviction prevention services, emergency utility assistance, and financial assistance for school, camp, and other childrens' programs.

Needham introduced the emergency rental assistance program to help stabilize tenants who lost income during the pandemic and were struggling to pay their rent. This program ran through most of 2021 and committed almost \$150,000 in program assistance. The Town's Community Housing Specialist provides ongoing support in answering inquiries and supplying important information and referrals. Homeless individuals and families, as well as those at risk of homelessness, are assisted by the Needham Housing Authority (NHA) in their search for affordable housing opportunities and support services. These households can be prioritized for occupancy in NHA developments.

The Watertown Housing Partnership (WHP) launched an emergency rental assistance program in September, 2020. The program seeks to avoid evictions and prevent homelessness. The WHP initially committed \$175,000 to assist Watertown residents struggling to pay rent because of economic loss related to COVID-19. Eligible households were required to have incomes below 80% of area median income and were not eligible if they had another form of public rental assistance. Households could receive assistance for up to three months, with the amount of money varying by bedroom configuration. The WHP voted in December 2020 to commit a further \$100,000 to this program and amended program guidelines to include recipients of other forms of public rental assistance and the renewal of assistance for an additional three months. HOME resources were not used for this program. While program funding ran out in December 2021, the Watertown Community Foundation is currently using a state grant to fill this gap. The City is reviewing options for 2022.

In FY23 Sudbury will administer an emergency rental relief program, funded by the Sudbury Housing Trust, to assist households earning 50% of the Area Median Income with temporary monthly rental assistance in the form of a grant (\$350-\$800 per month).

In Waltham, current CARES CDBG programs funds can provide financial support for those who may be facing eviction due to non-payment of rent and or rent arrears. Programs that remove the barrier of the upfront costs needed to obtain permanent housing is an ongoing need for

Waltham citizens. Waltham's TBRA rental assistance program has successfully bridged seven individuals into public housing this past year.

In FY23 the City will support several affordable housing projects that target the special needs population. This fiscal year, construction will be complete on the CDBG-funded Newton Housing Authority's Haywood House. Haywood House will consist of 55 one-bedroom rental apartments, of which 32 units will be affordable to elderly households at or below 60% AMI. Three of the units will be fully accessible for people with disabilities and four units will be designated for households that have been homeless or are at risk of homelessness. The project will also include two elevators and community space for supportive services. Construction is in progress for 2LifeCommunities' expansion of the Golda Meir House. This new community will add approximately 68 one- and two bedroom units through two additions. About 50 of the units will be income-restricted, 8 will be unrestricted for seniors up to 60% of the Area Median Income, and nine of these units will be set-aside for chronically homeless individuals with disabilities.

Across the Consortium, Tenant-Based Rental assistance and housing rehabilitation programs will target non-homeless special needs households. It is anticipated that 22 households will be assisted through Tenant Based Rental Assistance programs in Bedford, Framingham, Natick, Waltham and Wayland. In FY23, HOME funds will be used to advance several projects to rehabilitation housing authority units. HOME funds will be used to rehabilitate three rental housing units at the Brookline Housing Authority's Morse Apartments, a 100-unit elderly, high-rise, building owned by the Brookline Housing Authority. Waltham will commit HOME funds for accessibility improvements at the Beaverbrook Apartments, a 60-unit elderly development owned by the Waltham Housing Authority. The Framingham Housing Authority is proposing to redevelop Carlson Crossing, a 40 million dollar initiative to rehabilitate 125 housing units in 31 existing buildings. The project will also add three new buildings with seven accessible units. Finally, deferred payment loans offered by the Housing Rehabilitation program in Newton enable homeowners to complete health and safety repairs and improvements, which provides an opportunity for many elderly residents to age in place.

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

1. **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**

As in many other communities throughout greater Boston, one of the biggest challenges to the development of affordable housing in Newton is the zoning ordinance. While reasonable regulation of new development is important and to be expected, it is essential that the City closely examine its ordinances for potential obstacles to affordable housing development. Particular zoning and other city policies that have the potential to limit affordable housing include the following:

- Existing multi-family permitting processes. In Massachusetts, either a special permit or a comprehensive permit under Chapter 40B is typically required to create any multi-family housing (i.e. more than two units). These processes are often controversial and add time and cost to developments that could otherwise more easily create affordable housing units.
- Procurement policies. The City's procurement policy for affordable housing projects that utilize CDBG and HOME funds can increase overall project costs and the upfront time required to develop plans and specifications. The City may explore changes to the policy that could mitigate this barrier while ensuring fair and open competition.

In recognition of these existing barriers to the development of affordable housing, Division staff, along with staff in the Long Range Planning Division, intend to focus on the following programs and topic areas in the upcoming year.

### **Zoning Reform**

The City will continue to seek additional regulatory changes in FY23 (FFY22) through its Zoning Redesign Project. Zoning Redesign was initiated in 2011 and Phase One of the project was completed in 2015. The initial phase successfully reorganized the existing ordinance, making it easier to understand and interpret.

Phase Two of the Zoning Redesign Project seeks to create a new, context-based zoning ordinance that provides guidance and rules for the development and redevelopment of land in Newton. Context-based means the new zoning will sustain the City's existing development forms, reflect the building patterns of Newton's different neighborhoods and village centers, and allow new growth to occur in appropriate places and at appropriate scales. The Zoning Redesign Project intends to bring more predictability to land use regulation and the permitting process.



In FY21 (FFY20), the City extensively reviewed possible updates to its zoning ordinance in order to increase permitting flexibility and development incentives for affordable housing. Potential zoning revisions included: adopting controls which are less reliant on special permits or 40B approvals; facilitating both new development and the adaptation of existing housing to better serve needs of older and disabled residents; rewarding the provision of more affordable housing than the required share of affordable units, or rewarding developments incorporating such provisions as “accessibility” and “visitability.”

Objectives of this project as they relate to housing include incorporating fair housing requirements, definitions, and standards; directing multi-family and mixed-use development to transit and job-oriented locations; permitting a range of neighborhood scaled, multi-family building types; and strengthening the ordinance to better meet the vast and diverse housing needs of Newton today, including encouraging and supporting the development of more affordable units throughout the City.

After extensive City Council discussions and public listening events attended by hundreds of City residents, the City will use FY23 to delve deeper into critical challenges that an updated zoning ordinance could address, including how village centers and mixed use areas can better accommodate housing that is affordable at a range of price points, support of local businesses, protection of the environment, and creation of more vibrant community life.

### **Expansion of the Homeowner Rehabilitation Program**

Over the past few years, the City has expanded the Housing Rehabilitation program to better assist Newton Housing Authority tenants and other nonprofit housing organization projects. Previously, eligible work was limited solely to accessibility improvements, but now the Program allows projects to more comprehensively address critical repairs for health and human safety. The City also expanded the Housing Rehabilitation program to existing accessory apartments and lodging houses that require repairs to ensure resident health, safety, and building code compliance. The Housing Rehabilitation program guidelines will be revised in conjunction with the adoption of the Accessory Apartment Ordinance and the Lodging House Ordinance. Rental income from accessory apartments can help low- and moderate-income owners make mortgage payments and also offer “naturally affordable” small housing units for low- and moderate- income renters, which is identified in the FY21-25 Consolidated Plan’s Needs Assessment as a means toward encouraging diversity in the City’s housing stock.

### **Fair Housing**

Actions anticipated for addressing concerns regarding fair housing include the following:

- As the City continues to examine the redesign of its current zoning ordinance, Division staff and the Fair Housing Committee (FHC) will actively ensure that proposed zoning changes support the City’s goal to affirmatively further fair housing and avoid creating disparate impacts to protected classes.

- The City seeks to ensure that consideration of fair housing goes beyond regulatory minimums in order to implement the City’s documented fair housing development goals and objectives. The Fair Housing Committee assisted the City in developing the Fair Housing Project Consideration Tool for staff to utilize during project review. The tool goes beyond the reach of regulatory measures as City staff evaluate applicable housing development projects for consistency with fair housing goals and policies as outlined in the FY21-25 Consolidated Plan. All evaluations will result in a statement that “the objectives of the City’s Consolidated Plan, including fair housing, have been considered in this review.”
- Information designed to guide the public and developers on the process for developing affordable housing and Comprehensive Permit projects in Newton will continue to be available on the Planning and Development Department website. The webpage details the City’s fair housing policy and obligation to affirmatively further fair housing.
- The City’s Fair Housing Statement is posted on its website. This statement is also available in written documents through city departments, venues, sponsored events, activities targeting abutters of pending development, and zoning related actions affecting housing. At community meetings related to pending housing developments, the City will continue to inform the public of the City’s responsibility to affirmatively further fair housing, disseminating in writing, the City of Newton’s Fair Housing Statement. The City will include the U.S. Department of Housing & Urban Development’s (HUD) Fair Housing logo on all pertinent housing documents.
- The City and FHC will continue efforts to plan for informative and meaningful fair housing programming, striving for a minimum of one event and one outreach campaign annually. Training will be provided on an annual basis to city councilors, city staff, community partners, the general public and others involved in activity related to the provision of housing. Presentations may include a variety of topics such as disparate impact and fair housing principles. Additional events and outreach will be undertaken if circumstances support these efforts.
- In FY23, The West Metro HOME Consortium will re-release an RFP to hire a consultant to undertake fair housing testing throughout the 13 communities. The Analysis of Impediments to Fair Housing Choice (2020-2021) (AI) identified Fair Housing testing as a strategic approach to identifying discrimination in the private real estate market. The Consortium will also continue its work with MAPC on a parking utilization study of larger multi-family developments built since 2000. The study will assess whether parking requirements meet or exceed demand in new developments. Parking was identified as a potential barrier to affordable housing in the Consortium’s AI report.
- One November 1, 2021 the City Council voted to amend the City’s Inclusionary Zoning Ordinance to reduce the number of Inclusionary Units that are allowed to be set aside

through local preference from 70 to 25 percent. The change also required that at least one of the local preference units must be fully accessible for persons with disabilities. Newton's Local Preference policy is embedded in its Inclusionary Zoning (IZ) ordinance (Section 5.11.8.C.), which stipulates that up to 70% of affordable housing units that would be available as part of a tenant lottery can be set-aside and filled with income-eligible local preference households. Households qualifying for local preference may be current Newton residents, municipal employees, local business employees, and households with children attending Newton schools. With a population that is approximately 80 percent white, Newton's local preference policy has the potential to create a disparate impact on people of color. This was a critical policy change in the City's obligation to abide by the Federal Fair Housing Act and its duty to affirmatively further fair and equal housing opportunity for all.

### *Consortium Communities*

The Town of Belmont recently passed an overlay zoning district on Zone 3 of the McLean Hospital property. The overlay district allows a mixture of age-restricted and non-age restricted townhouses (Subdistrict A) and a mixture of age-restricted and non-age rental units (Subdistrict B). There is a 15 percent affordability requirement in Subdistrict A and a 25 percent affordability requirement in Subdistrict B. Five percent of the affordable rental units in Subdistrict B will be set-aside for proposed residents who earn 50% annual of the Area Median Income. A proposed development is currently being reviewed by the Planning Board under the overlay zoning regulations. The proposal includes provisions for housing to be occupied by a variety of households who otherwise would not have such housing opportunities within the Town, including lower income households and seniors.

The Towns of Bedford, Concord, Lexington, Sudbury and Wayland encourage local affordable housing initiatives through zoning changes and the adoption of inclusionary zoning provisions. The ability to access other local funds such as Community Preservation Act (CPA) and Housing Trust funds helps overcome the high cost of development. In addition, these communities support local housing authorities in their efforts to expand their portfolios with additional units. In FY23, Concord, Sudbury and Wayland will begin a process to update their Housing Production Plans. This will provide an opportunity for the communities to assess current housing needs and outline goals and strategies to increase the supply of housing for low and moderate-income households.

In 2019, the Town of Bedford developed a housing study to provide a strategic direction for housing in Bedford. Several of the goals and strategies identified in the study are aimed at promoting housing diversity and ensuring housing opportunities for households of all ages and backgrounds. Strategies that promote affordable housing include easing zoning restrictions on two-family dwellings and accessory dwelling units, amending zoning to explicitly permit congregate and co-living, and seeking opportunities for locally-initiated development of affordable housing. Bedford continues to work on these efforts to promote diverse housing opportunities in the Town.

There are four areas of focus for the Town of Brookline to make affordable housing more accessible to residents:

- **Regulatory:** The Brookline Zoning Bylaw includes provisions to increase affordable housing through the inclusionary housing ordinance. Brookline will continue to use its zoning bylaw proactively to encourage affordable housing as part of market-rate projects through the Inclusionary Zoning provision.
- **Resource Allocation:** Brookline provides fiscal resources and technical assistance to facilitate new affordable housing development. The Town will continue to use its own Housing Trust, CPA and ARPA funds to help write down high property and land costs associated with affordable housing development.
- **Education, Consultation and Advocacy:** The Brookline Housing Advisory Board (HAB) is fundamental in promoting the preservation and creation of affordable housing. The HAB will continue studying and providing guidance to town staff and boards regarding Brookline's housing needs, policies, programs, and zoning tools.

Over the past 15 years, Framingham enacted several laws to increase the affordable housing stock with an inclusionary zoning bylaw and redefinition of the central business district to include multi-family housing and transit orientated development. In FY22, Framingham residents passed the Community Preservation Act (CPA) funding into the community. As a result, the department anticipates forming crucial partnerships that will leverage HOME, CDBG, CPA and other funding to expand community affordable housing development.

Natick has been active in addressing issues of affordable housing and fair housing in the Town. Being a diverse and welcoming community has long been a core value of the Town and one well supported by the *Natick 2030+ Comprehensive Plan*. *Natick 2030+* calls for a number of regulatory changes to increase housing production with a greater diversity of housing choices and more affordable housing. Many of these recommended actions are already at work addressing issues, these include:

- **Inclusionary Zoning:** Natick updated its inclusionary zoning provisions in 2018 to expand the range of development projects to which the requirement to provide affordable units is applied and to increase the number of units that need to be included.
- **Housing Production Plan:** Municipal staff and the Natick Affordable Housing Trust are in the process of writing an updated Housing Production Plan for the Town.
- **REMAP:** The Town is one of six municipalities in greater Boston selected to participate in the new Racial Equity Municipal Action Plan program created by the Metropolitan Area Planning Council (MAPC) and the Boston Fed and working with the Government Alliance for Racial Equity (GARE). This yearlong process will conclude with an action plan that issues recommendations on housing challenges.
- **Tenant Based Rental Assistance:** Natick's Tenant Based Rental Assistance program, begun in July 2020, helps very low-income renters in Natick find a home and remain housed through down payment and rent assistance.

- St Patrick’s School Site Redevelopment: The Select Board has been leading an effort to redevelop the St Patrick’s school site on East Central Street. A significant aspect of this project is exceeding the number of new affordable housing units beyond the required threshold.

The Town continues to look for opportunities to develop affordable housing as part of redevelopment efforts in locations that have previously been zoned solely for business purposes. For example, the Town approved mixed-use zoning in an area along Highland Avenue in close proximity to Routes 128/95. It also approved changes to the Neighborhood Business District bylaw that would allow housing and mandate the inclusion of affordable housing or cash in-lieu of units. Another bylaw change allowed accessory dwelling units, previously not permitted.

Although Needham is over the 10% state affordability goal under Chapter 40B (at 12.76%), the Town has continued to approve affordable housing developments, including a 16-unit rental redevelopment project in a multi-family structure close to the Town Center. This project will include four affordable units evenly split between one and two-bedroom apartments. Additionally, nine affordable rental units will likely become eligible for inclusion in the SHI as part of The Residences at Carter Mill. The Needham Planning Board approved a Major Site Plan Review Special Permit to redevelop the former assisted living and skilled nursing facility into a mixed senior living development. The project was approved to include an 83-unit assisted living and Alzheimer’s/memory care facility and 72 independent living apartments. As required by local zoning, 12.5% of the total independent living units must be affordable to low- or moderate-income households as defined by 760 CMR 45.02.

Most recently, the Needham Planning Board appointed a working group of representatives of local boards and committees as well as three citizens at-large to prepare a housing plan. Since the Town’s current housing plan was approved in 2007, it has made considerable progress in producing affordable housing by adding 894 new units to its Subsidized Housing Inventory (SHI) and surpassing the state affordability goal of 10%. Despite reaching this threshold, the Town recognizes that significant unmet housing needs remain in the community, particularly in the context of unprecedented housing prices and the pandemic. The Town expects to have a plan in place by September 2022.

Waltham has completed an assessment through the creation of an ad hoc Housing Committee of Affordable Housing Barriers and identified several actions to create new affordable housing as well as prevent evictions for low-income tenants. Among these actions are: appropriating Community Preservation Act funds for emergency assistance to low-income tenants facing eviction; allocating a minimum of five-percent (5%) of annual building permit fees to increase the annual Municipal Housing Trust Fund; amending local zoning ordinances to permit certain accessory housing uses and establishing procedures to legalize apartments that were not permitted and/or do not presently comply with building and fire codes.

The five-year housing plan approved by the Watertown City Council in March 2021 recommends that the City continue to consider changing zoning that might serve as a barrier to affordable housing. In the last five years, Watertown has created new opportunities for mixed use development (including multi-family housing) along two major corridors (Pleasant Street and Arsenal Street) and substantially reduced parking requirements for multi-family projects. The new plan included a recommendation for Watertown to consider developer incentives that create units with lower rents, and encourage more development in close proximity to high-frequency bus lines and local retail employment. The plan also prioritized the creation of an accessory dwelling unit (ADU) ordinance. The Watertown Housing Partnership has been working on language to allow ADUs by right in single and two-family structures.

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

### 1. Actions planned to address obstacles to meeting underserved needs

Please refer to section AP-35: Projects.

#### *Consortium Communities*

Many of the Consortium communities will continue to work with staff, developers, consultants, and property owners to look for affordable housing development opportunities.

The Natick Affordable Housing Trust and Community & Economic Development Department began using town funds in the summer of 2021 to augment federal HOME monies to assist the Natick Service Council's new COVID 19 Tenant Based Rental Assistance program. Local resources can be used more flexibly and quickly in this program, allowing it to serve a greater number of clients with a wider array of housing problems.

The City of Waltham will continue to support the Waltham Housing Authority (WHA) with HOME funding to provide a resource for rehabilitation of aging units. By leveraging Community Preservation funds the City and the WHA are able to make substantial improvements to housing authority units with an emphasis on improving ADA accessibility.

### 2. Actions planned to foster and maintain affordable housing

In FY23 (FFY22), Newton will pursue a number of strategies to preserve and maintain existing affordable housing units, including administering a Downpayment/Closing Cost Assistance Program to support the resale of existing deed-restricted homeownership units to low- to moderate-income households; ensuring that rehabilitation and development funds are available to nonprofit owners of affordable housing to preserve the physical integrity of the City's affordable housing resources; and bolstering partnerships and collaborations with community organizations and nonprofit housing developers.

Brookline is a strategic partner in pursuing public-private partnerships that foster affordable housing development in key strategic locations town-wide. The Town assists the Brookline Housing Authority in numerous projects involving construction or repairs, major construction and renovation efforts as well as smaller repairs and replacements. Many other affordable housing development projects are funded with state programs, and the Town usually matches fiscal resources and technical assistance to facilitate new affordable housing development.

For over a decade, the City of Framingham bolstered affordable housing development and preservation through legislation and partnerships. Next year, the City will continue to use a mix of tools, such as municipal funding, inclusionary zoning, Community Preservation Act funding, as well as HOME and CDBG funds, to foster and maintain affordable housing. The department will tap into the resources of MassHousing, MassDevelopment, the Massachusetts Housing Investment Corporation, the Massachusetts Housing Partnership Fund and the Community

Economic Development Assistance Corporation to apply new ways of contributing specialized equity, lending and/or technical assistance to new-sponsored projects. The City of Framingham has committed close to 400,000 in HOME funds with an additional amount from the municipal mitigation funds.

In FY23, Natick has several initiatives to promote the creation of or maintain affordable housing, including:

- A comprehensive review of the Natick Zoning Bylaw to provide updates that comply with the recommendation of Natick 2030+ and the Natick Housing Production Plan;
- A partnership between the Natick Affordable Housing Trust (NAHT) and JM Goldson Inc. to prepare a strategic plan to guide the NAHT operations in future years.
- In 2021, the Natick Affordable Housing Trust (NAHT) contracted with consultant, Liz Valenta, to develop a comprehensive monitoring protocol for Natick's stock of affordable ownership homes created under MGL c. 40B.

Needham is in the process of supporting the Needham Housing Authority in its efforts to modernize, redevelop, and expand its inventory of deeply affordable units. The Needham Affordable Housing Trust meets at least twice a year to discuss housing issues and support efforts to promote greater housing affordability and diversity. To this end, the Town is preparing a housing plan to better define local housing needs and the most appropriate strategies for addressing these needs.

The City of Waltham will continue to support the Waltham Housing Authority (WHA) with HOME and CDBG funds to provide a resource for sustaining their aging units. By leveraging additional Community Preservation funds, the city and the WHA are able to make substantial improvements to Housing Authority units with an emphasis on improving ADA accessibility. Two 40B developments, 241 Second Avenue and 305 Winter Street, were recently approved to include units affordable to households at 60% of AMI.

### **3. Actions planned to reduce the number of poverty-level families**

One of the priorities of the Housing and Community Development Division is to fund programs and services for poverty-level individuals and families. According to the 2015-2019 ACS, the City of Newton had 4.3% of its population living below the poverty level, representing 3,522 individuals. Compared to the 2010-2014 American Community Survey (ACS) 5-Year Estimates, 5.6% of individuals in Newton are living below the poverty level, representing 4,463 individuals. This figure is a 1.3% decrease from prior year's data. The following is a breakdown of individuals living below the poverty level by age group and the 2020 and 2021 poverty guideline.



<b>Newton Population by Age Group</b>	<b>2010-2014 ACS Estimate Below Poverty Level</b>	<b>2015-2019 ACS Estimate Below Poverty Level</b>
Under 18 years	1,244	542
18 to 64 years	2,344	2,115
65 years and over	875	865
<b>Total</b>	<b>4,463</b>	<b>3,522</b>

Source: American Census Survey, 5-Year Estimate

<b>Household Size</b>	<b>Poverty Guideline (for 48 Continuous States and the District of Columbia)</b>	
	<b>2020</b>	<b>2021</b>
<b>1</b>	\$12,760	13,590
<b>2</b>	\$17,240	\$18,310
<b>3</b>	\$21,720	\$23,030
<b>4</b>	\$26,200	\$27,750
<b>5</b>	\$30,680	\$32,470
<b>6</b>	\$35,160	\$37,190
<b>7</b>	\$39,640	\$41,910
<b>8</b>	\$44,120	\$46,630
<b>For each additional person, add</b>	\$4,480	\$4,720

Source: Office of the Assistant Secretary for Planning and Evaluation, U.S. Department of Health and Human Services

Through the Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG), the City of Newton targets its federal

funds to support programs that, to the maximum extent possible, service extremely low- and moderate-income persons.

The City of Newton's CDBG Public Services and ESG program provide grants to support a number of a programs that serve poverty-level and low-income households in Newton and surrounding communities, including Brookline, Waltham, and Watertown.

Across the Consortium, there are an estimated 30,659 individuals living below the poverty level (2019 five-year American Community Survey). HOME-funded Tenant Based Rental Assistance and HOME-assisted units hold the potential to transition these individuals out of poverty and prevent other households from slipping below the poverty level. The highest poverty rates in the Consortium are found in Brookline, Framingham, and Waltham. These entitlement communities also provide the maximum allowable CDBG funding for public service activities, which primarily serve low to moderate income persons and households. In many of the smaller Consortium communities, such as Bedford, Concord, Lexington, Sudbury and Wayland, the housing authorities are the primary resource for assisting poverty-level households.

Every year, the City of Framingham sponsors the work of local nonprofits as part of its poverty alleviation strategy. The sponsored agencies' mission range from food security for homeless and low-income residents to ESL classes for new immigrants adjusting to life in the United States. This strategy partially hinges on close collaboration with town departments and community organizations. Such close collaboration has resulted in referrals to the Tenant-Based Rental assistance program by local agencies and by CD staff to resources for food, literacy, non-TBRA rental assistance, after-school programs or the possibility of homeownership.

In FY23 Sudbury will administer an Emergency Rental Relief Program, funded by the Sudbury Housing Trust, to assist households earning 50% of the Area Median Income with temporary monthly rental assistance in the form of a grant (\$350-\$800 per month).

The Town of Natick started annually appropriating \$80,000 in local revenues to the Natick Affordable Housing Trust for developing and preserving affordable housing for needy households in the Town.

Waltham will continue to award federal funds to social service agencies that are providing ESOL classes, and job training to low income non-English speaking households; assistance to very low- income families, services to at risk youth; and emergency utility assistance to income eligible families in financial stress. The Waltham Housing Division will also continue to administer the Cares Emergency Assistance Program by providing assistance to households that are at risk of eviction and facing displacement, which helps families avoid the negative social and health consequences of displacement. These include the disruption of social networks, risk of living in overcrowded conditions, extremely long commutes, and even homelessness.

#### **4. Actions planned to reduce lead-based paint hazards**

Newton's Housing Rehabilitation program currently uses CDBG funding to provide grants to income-eligible homeowners to remove lead-based paint, asbestos, and other health hazards. The program also offers these homeowners zero-interest deferred payment loans to fix building and safety code violations. This successful program will be continued in FY23 (FFY22).

As noted in the Needs Assessment and Market Analysis and the Strategic Plan Chapters of the FY21-25 Consolidated Plan, the reported incidence of lead poisoning is low in Newton and surrounding communities. However, over 80% of housing in the Consortium was built before 1980, therefore a majority of those units are presumed to have lead hazards. As a result, the City will continue to make lead paint abatement and the removal of asbestos and other such health hazards a priority in the Housing Rehabilitation program.

These specific lead-based paint hazard prevention and remediation activities are incorporated into the city's housing policies and procedures. The City's Housing Rehabilitation program is marketed to income-eligible homeowners and/or landlords with more than 50% income-eligible tenants to ensure suitable safe living conditions, which is one of the primary tenets of the CDBG program. In addition, once a rehabilitation application is accepted, the city's housing rehabilitation and construction manager walks through the entire house with the homeowner, not just the area identified by the applicant as needing repair. In this way, staff is able to identify and remediate all unsafe or unhealthy living conditions. Often the issues identified are mental health related (i.e. hoarding, dementia etc.) as well as general physical disrepair. In these cases, the homeowner can be referred to a social service agency whose staff can appropriately address those other needs as well.

The Regional Housing Service Office ensures that all HOME funded projects and programs in Bedford, Concord, Lexington, Sudbury, and Wayland comply with the applicable lead laws and regulations. This includes measures to verify that households receiving Tenant Based Rental Assistance funds meet applicable requirements and development or renovation projects have completed environmental reviews prior to committing funds.

Lead-based paint and other hazards are managed by the Brookline's Health Department Division of Environmental Health. Lead hazards are a violation of the Massachusetts Sanitary Code, and the Health Department is the agency tasked with the enforcement of regulations and requirements for lead removal, abatement and containment. Contractors are required to comply with the State's requirements of safe practices for renovation and lead abatement. The City refers constituents in need of lead abatement to many Mass Housing agencies in charge of administering the Get the Lead Out Program, such as Urban Edge. Households with a child under 6 years of age can request an inspection by the Brookline Health Department. In Brookline projects funded with CDBG and HOME funds, are required by law to assess environmental impacts through an environmental review. Projects are responsible to disclose the presence of toxic substances such as lead and/or asbestos, and in many cases, it is required to release a mitigation plan if the proposed activity requires it.

Framingham addresses lead hazards through the City's rehabilitation program. If there is a child under 6 years of age living in the household and the project meets the funding threshold, the City will conduct a lead inspection. If lead hazards are found, lead remediation will be included in the scope of work. Lead safe work practices are required for all projects, even those that do not involve lead remediation.

While Needham has a Health Department staff person who has a Lead Determinator License from the state, the Town rarely receives complaints about the existence of lead-based paint in homes and typically refers complaints to the MA Lead Poisoning Prevention Program/Childhood Lead Poisoning Prevention Program. The Town also provides information to residents on lead-based paint issues through a section on the Town's housing website, a housing brochure, and referrals to the state's "Get the Lead Out" Program for financial assistance on lead-based paint removal. Moreover, as part of the demolition permitting process, the Town requires that all builders hire a water truck to be present on site throughout the demolition process to spray down any dust plumes that may occur to prevent potential airborne hazards from migrating onto other neighboring properties.

The Waltham Housing Department administers the CDBG-funded lead paint deferred loan program to income eligible homeowners and or to landlords who have low to moderate income tenants. Owners or tenants must be within the HUD income guideline at or below 80% of the AMI.

Watertown's social services coordinator and local nonprofit Metro West Collaborative Development provide information about lead based paint to households as requested. All HOME assisted units are certified lead-free.

## **5. Actions planned to develop institutional structure**

The Housing and Community Development Division will continue to enhance program coordination functions through improved inter-departmental communication, earlier identification and scoping of projects and priorities, continued engagement of local, private, nonprofit, state and federal partners and a greater focus on outcome measures.

For many of the Consortium communities, the biggest gap in institutional structure results from limited departmental capacity due to larger workloads, staff turnover, and small numbers of staff.

The Towns of Bedford, Concord, Lexington, Sudbury and Wayland are members of the RHSO, a municipal regional collaborative providing technical assistance to the municipal boards, committees and staff. This has served to increase municipal capacity for affordable housing.

Framingham's Community Development Program credits its success to cooperative participation of governmental agencies, nonprofit organizations, private enterprises and

individuals in its service delivery. The Program's approach is to build new relationships that benefit clients and the community in the form of referrals to the Tenant Based Rental Assistance program, Housing Rehabilitation program, and responses to an RFP for new services by local agencies. This approach also contributes to the creation of a strong-civic infrastructure comprising of the public, private, and nonprofit sectors. It generates networks, coalitions, and partnerships that serve as platforms for continued dialogue on community improvements.

The Waltham Housing Division will become the Department of Housing and Community Development. The restructuring of the department will add two staff members from the Planning Department into Housing increasing the number of staff from four to six. This reorganization will also shift the responsibilities of the CDBG and HOME programs over to the Department of Housing and Community Development while the Planning Department will be responsible for Zoning and Special Permitting matters.

Watertown's City Council authorized the formation of a municipal affordable housing trust in November 2021. Forming such a trust will increase the Town's capacity to create and preserve affordable housing by adding an entity with the authority to engage in real estate activities.

- 1. Actions planned to enhance coordination between public and private housing and social service agencies**

Please refer to section AP-10: Consultation at the beginning of this plan.

## PROGRAM SPECIFIC REQUIREMENTS

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

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

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

For those communities that have utilized HOME funds for homebuyer and homeownership activities, program participants are required to occupy the property acquired with assistance through the program as their principal residence for the duration of the Affordability Period, in accordance with **24 CFR 92.254(a)(4)**. The Affordability Period is determined by the amount of HOME financial assistance provided to the program participant, as detailed in the table below.

Downpayment/Homebuyer	Affordability Period
Less than \$15,000	Five (5) Years
\$15,000 - \$40,000	Ten (10) Years
Over \$40,000	Fifteen (15) Years

Period of Affordability Chart

#### ***Bedford, Belmont, Concord, Lexington, Needham, Sudbury and Wayland***

These communities are unable to utilize HOME funds for ownership units of new construction due to the conflicts between the State's affordable housing deed riders and the HOME Program rule, with respect to the resale and recapture provisions. These communities understand that if a HOME-assisted homeownership project or program is put forward, the recapture/resale provision will have to be submitted to HUD (through the Consortium Administrator) for approval prior to HOME funds being used for such assistance. This guideline has not changed since the submission of the FY16-20 Consolidated Plan.

#### ***Brookline***

When providing homebuyer assistance, that is, funding directly to a homebuyer to purchase an existing unit at a market price, the town will continue to pursue two different strategies.

- (1) If the unit is located in a property with fewer than six units, at the time of resale, the seller will repay to the town the down payment assistance provided plus that portion of the net appreciation, if any (current market price minus original sales price, appraisal fee, if any, brokerage fee up to five percent of resale price, and the depreciated cost of approved capital improvements) which reflects the proportion of public subsidy to total equity invested. Total equity consists of town homebuyer assistance, owner down payment, owner pay-down of principal and, for consistency

with HUD requirements, the cost of capital improvements referenced earlier. In no case will the owner be required to repay the town more than the net proceeds for the sale, that is, the sales price minus non-HOME loan repayment and sale-related and closing costs.

- (2) If the unit is in a property with six or more units, the town will have a right of first refusal at a price which represents the original purchase price, minus the subsidy, adjusted by changes in AMI or 80 percent of median income, whichever is lower, plus compensation for the depreciated cost of approved capital improvements, plus the amount in the condominium association's segregated capital replacement account attributable to the unit. In the event that the town cannot exercise its rights, the seller will be free to sell on the market and repay the loan with shared appreciation in accordance with (1), above.

It should be noted that the town has not operated this type of Housing Assistance Program for a number of years due to the high price of market-rate units. For example, median condo prices in Brookline for 2019 are over \$900,000 and single families are even more expensive. Even with generous subsidies, most market-rate units are unaffordable to households earning less than 80% of AMI. At this time, the town prefers to use all locally-controlled resources to support affordable housing projects that can leverage state, federal, and private funding resources.

The town will continue to use the Commonwealth of Massachusetts' Affordable Housing Deed Rider as a resale restriction for units which are offered – through inclusionary zoning, the State Chapter 40B program and/or various non-HOME subsidies. According to this deed rider, resale price is based upon increases over time in Area Median Income, adjusted by the commercially reasonable cost of approved capital improvements, depreciated over the remaining years of the owner's occupancy, as long as the price at resale is neither more than what a range of income-eligible buyers can afford nor less than the owner's initial purchase price.

However, where HOME funds are provided to a developer in order to acquire and rehab or build new units for sale at affordable prices, the town will use a resale agreement running with the land that will provide the owner with a fair return on investment, while assuring that the unit will be affordable to a range of income-eligible buyers at least through the HOME period of affordability. Resale price will be the initial sales price plus the commercially reasonable cost of approved capital improvements depreciated over the remaining years of the owner's occupancy, plus return on investment. Investment will be defined as the original downpayment, annual contributions to principal, and commercially reasonable cost of approved capital improvements. Return on investment will be calculated as the sum of the annual interest on the owner's cumulative investment (without compounding), based on the interest rate of ten-year bond obligations of the United States Treasury.

With regard to repayment for capital improvements, capital improvements must be approved beforehand, and be of function and quality (or be so valued) consistent with the use of the

housing as affordable housing. The capital improvements are those owned by the condominium owner (and not part of common space) and might include, for example, the replacement, due to damage or long term wear and tear, of windows, heating or hot water systems, and stove, refrigerator or dishwasher.

The Town understands that, to the extent that resale price for a HOME-subsidized unit during the HUD period of affordability exceeds what a range of income-eligible buyers can afford, it may be obligated to fund the difference. A resale price is within the range of income-eligible buyers if it is based upon what a household with a size which equals the number of bedrooms plus one and an income 10 percent below the relevant income limit can afford when spending no more than 30 percent of gross income on housing costs (mortgage, real estate taxes, home and private mortgage insurance, and condo fees), assuming current interest rates offered plus one quarter percent for a 30 year, no point fixed-rate loan with a down payment of five percent of total costs. Units that come up for resale will be targeted to low-income first-time homebuyers earning up to 80 percent of the Boston-Cambridge-Quincy MA-NH Area Median Income (AMI), as published by the U.S. Department of Housing and Urban Development, for the duration of the HOME Period of Affordability (*see affordability period chart at the beginning of Section 1*) and as consistent with the number of bedrooms in the unit.

With regard to the preservation of affordable rental housing, when providing funding to developers/owners of rental properties, the town will continue to structure the subsidy as a long-term deferred interest loan, which may be extended if required for continued affordability, and to reserve for the town a right of first refusal to purchase the property should the owner seek to sell.

### ***Framingham***

The City of Framingham employs a deed restriction to serve as a recapture mechanism for its HOME-funded downpayment assistance and housing rehabilitation programs. The Period of Affordability Chart identified in the beginning of Section 1 will apply. For both types of assistance, if the premises are sold, cease to be the mortgagor's primary residence or there is any change in the title during the term of the promissory note, which commences upon the completion date, or the mortgagor is not in substantial compliance with the promissory note and mortgage, the town will recapture the full HOME loan or the net proceeds, if the net proceeds are less than the full amount of the HOME loan and the Mortgagor's investment.

### ***Natick***

The Town of Natick will use the recapture provisions for those housing units that are not intended to be listed on the DHCD Subsidized Housing Inventory (SHI), or do not qualify for the DHCD Local Initiative Program and/or Local Action Units. In these cases, the amount subject to recapture is the amount of the direct subsidy provided to the homeowner, and/or the difference between the fair market value of the property and a reduced sales price attributable to HOME development assistance. The HOME assistance will be recaptured in the full amount of the direct subsidy based on the availability of net proceeds which is defined as the sales price minus superior loan repayment (other than HOME funds) and any closing costs.



For those housing units that are intended to be listed on the DHCD SHI and/or qualify for the DHCD Local Initiative Program or Local Action Unit, the Town of Natick will use the resale provisions to ensure long term affordability. The Period of Affordability outlined at the beginning of Section 1 will apply. In these cases during the HOME period of affordability, the property must remain affordable to low income homebuyers spending no more than 30 percent of gross income on mortgage payments (PITI) and condo fees; and be sold at a price that provides the owner a fair return on investment. The sale of the property is limited to a credit-worthy eligible purchaser earning between seventy and eighty percent (70-80%) of the Area Median Income for an appropriate size household. During the initial 90 days of marketing, the town will have a Right of First Refusal to purchase the property.

The basis for a fair return on investment includes the homebuyer's original investment and capital improvements and is dependent on a maximum sales price based on the change in Area Median Income (AMI) over the period of ownership. The maximum sales price is determined by taking the ratio of the original HOME assisted unit sales price over the purchase year AMI, and multiplying this number by the current AMI to get the current base sales price, to which is added closing costs and capital improvements. Capital improvements must be approved by the town to be considered and are defined as a necessary improvement, not covered by a condo or homeowner fee, that if not done would compromise the structural or functional integrity of the original property. The value of capital improvements at the time of resale will be based on a depreciation schedule. The town understands that, to the extent that resale price for a HOME-subsidized unit during the HUD period of affordability exceeds what a range of income-eligible buyers can afford, it may be obligated to fund the difference.

### ***Newton***

The City of Newton utilizes HOME Program funds for new construction and rehabilitation of affordable rental housing, as projects arise. Direct downpayment assistance is provided through CDBG funds. In the past, when HOME funds were used to support affordable homeownership, Newton used a resale provision incorporated into an affordable housing covenants running with the land. The terms of the resale provision, which apply during the HOME Period of Affordability, are as follows:

*Long-Term Affordability.* All HOME-assisted units must be sold only to a buyer whose family qualifies as a low-income family earning up to 80 percent of the Boston-Cambridge-Quincy MA-NH Area Median Income (AMI), as published by the U.S. Department of Housing and Urban Development, for the duration of the HOME Period of Affordability. If an eligible buyer is not identified within the allotted resale timeframe, the City may exercise a purchase option to ensure that the HOME-assisted unit is resold to a low-income family.

*Principal Residence Requirement.* The initial purchaser, and all subsequent buyers of a HOME-assisted unit, must use the property as his/her/their principal residence. Newton conducts annual monitoring to ensure this requirement is met.

*Resale Price & Fair Return on Investment.* If the HOME-assisted unit is sold by the owner during the HOME Period of Affordability, the resale price is calculated as the percentage change of 80 percent of the AMI, as published by HUD, during the term of ownership by the homeowner, plus approved Capital Improvements depreciated over the course of their usual life.

*Calculating Fair Return on Investment.* Fair Return on Investment is calculated by multiplying the initial purchase price of the HOME-assisted unit by a fraction, the numerator of which is 80 percent of the AMI as published by HUD as of the date of receipt of the owner's notice to sell the affordable unit (Conveyance Notice) and the denominator of which is 80 percent of the AMI as published by HUD as of the date of the initial closing, plus approved Capital Improvements, depreciated over the course of their useful life. The original homeowner's investment (e.g. any downpayment) is included as part of the initial purchase price.

*Capital Improvements.* Capital Improvements are elements which may add to the value of the unit or prolong its useful life, are of function and quality consistent with comparable affordable housing units, and are owned solely by the owner (not part of any common areas). Maintenance is not considered a capital improvement. The City must approve all capital improvements prior to costs being incurred. These approved capital improvements are subject to depreciation based on the remaining useful life of the element at time of resale. Improvements that are funded by federal, state or local grant programs are not eligible. Some examples of capital improvements include the replacement of non-operational heating or hot water systems, built-in appliances, installation of energy-efficient windows, and insulation.

*Continued Affordability to Homebuyers.* In accordance with the HOME regulations, Newton is obligated to ensure that the owner of a HOME-assisted unit receives a Fair Return on Investment and that the unit remains affordable to a range of income eligible households upon resale. To maintain continued affordability, the City will target subsequent purchase to appropriately-sized households earning between 70 and 80 percent of the AMI spending no more than 35 percent of gross household income on fixed housing costs (principal, interest, property taxes, condominium fees, if applicable, and insurance), assuming current interest rates offered plus one quarter percent for a 30-year, fixed rate loan and a downpayment of 5 percent. If the resale price exceeds what an eligible household can afford, the City may choose to subsidize the difference with downpayment assistance, mortgage buydown, or other subsidy, as appropriate. To be considered eligible, homebuyers will also be subject to an asset limit of \$75,000. However, any assets up to \$200,000 from the sale of a Newton residence shall be excluded from that determination (but still considered in determination of income eligibility) provided that:

- (a) the sellers must have been no less than 62 years old at the time of that sale; and
- (b) the sale of the residence must be an arms-length transaction.

### **Waltham**

The City of Waltham enforces a recapture provision on all Down Payment assistance loans that it has provided through the WestMetro HOME Consortium. If the premises are sold, cease to be the Mortgagor's primary residence or there is any change in the title during the term of the

Promissory Note, which commences upon the Completion Date, or the Mortgagor is not in substantial compliance with the Promissory Note and Mortgage, the City will recapture the full HOME loan or the net proceeds, if the net proceeds are less than the full amount of the HOME loan and the Mortgagor's investment. The City specifically reserves the right to require full repayment, notwithstanding any deficiency in the amount of the net proceeds, in the event that repayment is triggered by a willful violation by the Borrower of the terms of the Note, or the Mortgage or any applicable HOME regulations. This recapture provision conforms to HUD HOME regulation 24 CFR 92.254 (a)(5)(ii). HUD defines the net proceeds as the sales price minus non-HOME loan repayments and closing costs. If the net proceeds are sufficient to repay both the HOME loan and the Borrower's investment (HUD defines Borrower's investment as the Borrower's down payment and any capital improvement investment), the City must recapture the full HOME loan. Please note, however, that when the net proceeds are insufficient to repay the full HOME assistance, the City will not permit the Borrower to recover more than his/her investment.

The Principal sum may be deferred annually by the City based upon annual review by the Lender of the Borrower's compliance with the terms of this Mortgage, the HOME Program and HOME Project funding agreement and the Promissory Note. The City of Waltham defines capital improvements as a necessary maintenance improvement, not covered by a condominium or homeowners association fee, that if not done would compromise the structural integrity of the property. To be considered a capital improvement, work should meet the following criteria:

- It is not a repair to keep your home in good operating condition.
- It is a new element or replacement of a permanent component of the home, which has reached the end of its useful life.
- It is not part of a common area nor covered by the condominium association fee. This applies to all condo-developed property. (If the condominium or homeowner's association has a special assessment, the City will take into consideration the cost to the homeowner on a case-by-case basis. Additional documentation will be necessary to provide proof of the special assessment.)

Repairs funded by any federal or state or local Grant Programs are not counted or approved. Improvements such as installation of outdoor decks, additions, garages, and landscaping are luxury improvements and will not be considered as capital improvements.

### ***Watertown***

Watertown, on any new projects using HOME funds, through the Watertown Housing Partnership, uses the Massachusetts Department of Community Development and Housing's Capital Improvements Policy and Procedures. Watertown uses a recapture provision which requires the HOME loan recipient to repay the loan, and, in some cases, a pre-payment penalty and a share in the appreciation in the project from the proceeds of the sale. The Period of Affordability Chart identified in the beginning of Section 1 will apply.

## **2. A description of the guidelines for resale or recapture that ensures the affordability of**

**units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:**

For those communities that have utilized HOME funds for homebuyer and homeownership activities, program participants are required to occupy the property acquired with assistance through the program as their principal residence for the duration of the Affordability Period, in accordance with **24 CFR 92.254(a)(4)**. The Affordability Period is determined by the amount of HOME financial assistance provided to the program participant, as detailed in the table below.

<b>Downpayment/Homebuyer</b>	<b>Affordability Period</b>
Less than \$15,000	Five (5) Years
\$15,000 - \$40,000	Ten (10) Years
Over \$40,000	Fifteen (15) Years

Period of Affordability Chart

***Bedford, Concord, Lexington, Needham, Sudbury, and Wayland***

These communities choose not to utilize HOME funds for newly constructed ownership units due to the conflicts between the State’s affordable housing deed riders and the HOME Program rule, with respect to the resale and recapture provisions. This guideline has not changed since the submission of the FY16-20 Consolidated Plan.

***Brookline***

When providing homebuyer assistance, that is, funding directly to a homebuyer to purchase an existing unit at a market price, the town will continue to pursue two different strategies.

- (1) If the unit is located in a property with fewer than six units, at the time of resale, the seller will repay to the town the down payment assistance provided plus that portion of the net appreciation, if any (current market price minus original sales price, appraisal fee, if any, brokerage fee up to five percent of resale price, and the depreciated cost of approved capital improvements) which reflects the proportion of public subsidy to total equity invested. Total equity consists of town homebuyer assistance, owner down payment, owner pay-down of principal and, for consistency with HUD requirements, the cost of capital improvements referenced earlier. In no case will the owner be required to repay the town more than the net proceeds for the sale, that is, the sales price minus non-HOME loan repayment and sale-related and closing costs.
- (2) If the unit is in a property with six or more units, the town will have a right of first refusal at a price which represents the original purchase price, minus the subsidy, adjusted by changes in AMI or 80 percent of median income, whichever is lower, plus compensation for

the depreciated cost of approved capital improvements, plus the amount in the condominium association's segregated capital replacement account attributable to the unit. In the event that the town cannot exercise its rights, the seller will be free to sell on the market and repay the loan with shared appreciation in accordance with (1), above.

The town will continue to use the Commonwealth of Massachusetts' Affordable Housing Deed Rider as a resale restriction for units which are offered – through inclusionary zoning, the State Chapter 40B program and/or various non-HOME subsidies. According to this deed rider, resale price is based upon increases over time in Area Median Income, adjusted by the commercially reasonable cost of approved capital improvements, depreciated over the remaining years of the owner's occupancy, as long as the price at resale is neither more than what a range of income-eligible buyers can afford nor less than the owner's initial purchase price.

However, where HOME funds are provided to a developer in order to acquire and rehabilitate or build new units for sale at affordable prices, the town will use a resale agreement running with the land that will provide the owner with a fair return on investment, while assuring that the unit will be affordable to a range of income-eligible buyers at least through the HOME period of affordability. Resale price will be the initial sales price plus the commercially reasonable cost of approved capital improvements depreciated over the remaining years of the owner's occupancy, plus return on investment. Investment will be defined as the original downpayment, annual contributions to principal, and commercially reasonable cost of approved capital improvements. Return on investment will be calculated as the sum of the annual interest on the owner's cumulative investment (without compounding), based on the interest rate of ten-year bond obligations of the United States Treasury.

With regard to repayment for capital improvements, capital improvements must be approved beforehand, and be of function and quality (or be so valued) consistent with the use of the housing as affordable housing. The capital improvements are those owned by the condominium owner (and not part of common space) and might include, for example, the replacement, due to damage or long term wear and tear, of windows, heating or hot water systems, and stove, refrigerator or dishwasher.

The town understands that, to the extent that resale price for a HOME-subsidized unit during the HUD period of affordability exceeds what a range of income-eligible buyers can afford, it may be obligated to fund the difference. A resale price is within the range of income-eligible buyers if it is based upon what a household with a size which equals the number of bedrooms plus one and an income 10 percent below the relevant income limit can afford when spending no more than 30 percent of gross income on housing costs (mortgage, real estate taxes, home and private mortgage insurance, and condo fees), assuming current interest rates offered plus one quarter percent for a 30 year, no point fixed-rate loan with a down payment of five percent of total costs. Units that come up for resale will be targeted to low-income first-time homebuyers earning up to 80 percent of the Boston-Cambridge-Quincy MA-NH Area Median Income (AMI), as published by the U.S. Department of Housing and Urban Development, for the

duration of the HOME Period of Affordability (*see affordability period chart outlined above*) and as consistent with the number of bedrooms in the unit.

With regard to the preservation of affordable rental housing, when providing funding to developers/owners of rental properties, the town will continue to structure the subsidy as a long-term deferred interest loan, which may be extended if required for continued affordability, and to reserve for the town a right of first refusal to purchase the property should the owner seek to sell.

### **Framingham**

In Framingham, HOME-assisted units must meet the affordability requirements of five to 20 years beginning after project completion (*Please see affordability period chart outlined above*). The affordability requirements apply without regard to the term of any loan or mortgage or the transfer of ownership. They are imposed by deed restrictions approved by HUD. The deeds are structured to recapture funds when the following circumstances occur:

- If the premises are sold
- Cease to be the client's primary residence
- Any change in the title during the term of the promissory note, which commences upon the completion date
- Substantial non-compliance with the promissory note and mortgage by the client

When triggered, recaptures take back the full HOME loan or the net proceeds, if the net proceeds are less than the full amount of the HOME loan and the client's investment.

### **Natick**

The Town of Natick will use the recapture provisions for those housing units that are not intended to be listed on the DHCD Subsidized Housing Inventory (SHI), or do not qualify for the DHCD Local Initiative Program and/or Local Action Units. In these cases, the amount subject to recapture is the amount of the direct subsidy provided to the homeowner, and/or the difference between the fair market value of the property and a reduced sales price attributable to HOME development assistance. The HOME assistance will be recaptured in the full amount of the direct subsidy based on the availability of net proceeds which is defined as the sales price minus superior loan repayment (other than HOME funds) and any closing costs.

For those housing units that are intended to be listed on the DHCD SHI and/or qualify for the DHCD Local Initiative Program or Local Action Unit, the Town of Natick will use the resale provisions to ensure long term affordability. The Period of Affordability outlined at the beginning of Section 1 will apply. In these cases during the HOME period of affordability, the property must remain affordable to low income homebuyers spending no more than 30 percent of gross income on mortgage payments (PITI) and condo fees; and be sold at a price that provides the owner a fair return on investment. The sale of the property is limited to a credit-worthy eligible purchaser earning between seventy and eighty percent (70-80%) of the Area Median Income for an appropriate size household. During the initial 90 days of marketing,

the town will have a Right of First Refusal to purchase the property.

The basis for a fair return on investment includes the homebuyer's original investment and capital improvements and is dependent on a maximum sales price based on the change in Area Median Income (AMI) over the period of ownership. The maximum sales price is determined by taking the ratio of the original HOME assisted unit sales price over the purchase year AMI, and multiplying this number by the current AMI to get the current base sales price, to which is added closing costs and capital improvements. Capital improvements must be approved by the town to be considered and are defined as a necessary improvement, not covered by a condo or homeowner fee, that if not done would compromise the structural or functional integrity of the original property. The value of capital improvements at the time of resale will be based on a depreciation schedule. The town understands that, to the extent that resale price for a HOME-subsidized unit during the HUD period of affordability exceeds what a range of income-eligible buyers can afford, it may be obligated to fund the difference.

***Newton***

Under resale provisions, all properties acquired through a development subsidy or receiving direct homebuyer assistance with HOME funds will have a recorded deed restriction stating the affordability period and the process for calculating the resale amount to ensure long term affordability to an income-eligible household during the affordability period. Additionally, any loan issued by the City is secured by a mortgage and promissory note.

***Waltham***

Under recapture provisions, all properties receiving direct homebuyer assistance and/or rehabilitated with HOME funds will have a recorded mortgage stating the affordability period (*outlined above*) and the process for calculating the recapture amounts.

***Watertown***

Under recapture provisions, all properties receiving direct homebuyer assistance with HOME funds will have a recorded mortgage stating the affordability period (*outlined above*) and the process for calculating the recapture amounts.

**3. 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:**

No communities have plans to refinance existing debt secured by properties that have HOME funds in FY23 (FFY22).

**Emergency Solutions Grant (ESG)  
Reference 91.220(l)(4)**

- 1. Include written standards for providing ESG assistance (may include as attachment) In accordance with federal regulations set forth in 24 CFR Part 567, the City of Newton's Department of Planning and Development has developed written standards guiding the provision and prioritization of Emergency Solutions Grant (ESG) funding.**

Service providers contracted with the City of Newton to provide services in conjunction with the Emergency Solutions Grant must become thoroughly familiar with all regulations promulgated by the United States Department of Housing and Urban Development (HUD) governing the Emergency Solutions Grant Program and the City of Newton's written standards. All sub-grantees are responsible for implementing the service in accordance with these regulations.

*(Please also see Written Standards for the Provision of ESG Assistance in the appendix)*

- 2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.**

Coordinated Entry refers to the process used to assess and assist in meeting the housing needs of people experiencing homelessness. This process is intended to serve people experiencing homelessness with ties to the communities of the Balance of State (BoS) Continuum of Care (CoC). BoS Coordinated Entry aims to allocate assistance as effectively as possible in order to meet consumer housing needs including, fostering increased collaboration between service providers, avoiding duplication of services, assessing and prioritizing based on vulnerability, and reducing the amount of time individuals experiencing homelessness must wait before accessing assistance. All individuals identifying as homeless are evaluated, regardless of initial residency, by outreach workers and service providers through centralized intake. CE staff then work to connect individual(s) to appropriate services and programming.

In January 2020, the BoS CoC updated its Coordinated Entry scoring process to place a priority and emphasis on homeless youth. Updated materials have been included in the City's written standards.

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



**organizations).**

The distribution of ESG funds to sub-recipients is determined through a competitive, annual RFP process. Division staff also consults with sub-recipients regarding their projects and funding needs. The RFP requires the respondents to indicate how their programs will assist homeless individuals and families or those at risk of homelessness in each of these areas, as well as how the projects will help clients achieve housing stability.

In advance of the release of the FY23 (FFY22) RFP, the representatives of the BNWW CoC, including local providers and municipal staff, and BoS CoC met to prioritize funding allocation percentages across eligible program components helping homeless individuals and families and those at-risk of becoming homeless. These components include Street Outreach, Shelter Operations/Services, Homelessness Prevention, Rapid Re-housing, and HMIS. After discussion and deliberation, the cohort recommended to not allocate ESG funding for street outreach or HMIS as providers identified unsheltered homeless individuals and families to be serviced by existing resources. As a result, given the impacts of the coronavirus pandemic, the cohort recommended allocating the full amount allowable (60% of the total award) to the shelter service activities and focusing the remaining resources on HUD's long-term priorities of homelessness prevention and rapid re-housing. These principles align with the BoS CoC' and United States Interagency Council on Homelessness' Strategic Plans to End Homelessness.

**4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.**

To the extent possible, outreach is made to residents who have experienced homelessness. The Point-In-Time Count (sheltered and unsheltered) and the Housing Inventory Count are managed by the BoS CoC. The BoS CoC develops a survey to determine demographic information about this vulnerable population, as well as specific reasons for why someone is homeless and/or, whenever possible, what services may be needed to improve his/her situation in the future.

In addition, the representatives of the four municipalities and local social service providers meet annually to determine the percentage allocation for each category of eligible services: Street Outreach, Shelter Operations/Services, Rapid Re-housing, Homelessness Prevention, and HMIS. Agency staff have direct contact with potential beneficiaries, as well as a long track record of providing services directly to the homeless and at-risk homelessness populations, and their work specifically informs this allocation.

**5. Describe performance standards for evaluating ESG.**

As part of the FY23 RFP review process, the review committee members, consisting of

representatives from the City of Newton Planning and Development Department, Newton Health and Human Service Department, Newton Executive Office, BoS CoC, City of Waltham, City of Watertown, City of Brookline, and Pine Street Inn, a local provider, evaluate the uses and outcomes of existing ESG-funded projects from FY20, FY21, and FY22, should the providers choose to re-apply for funds for the upcoming fiscal year. This is accomplished through the analysis of reports of monitored projects, as well as a review of quarterly performance reports that are submitted during the program year. The RFP is also evaluated with the assistance of a quantitative scoring sheet.

As allocations are becoming increasingly more data driven, ESG and CoC service providers must navigate the VESTA HMIS system, or the DV equivalents, to input client intake/exit information and ensure accurate data compilation and reporting. Beginning in October 2017, ESG recipients were required to submit this accomplishment data into the Sage HMIS Reporting Repository. The ESG-CAPER Annual Reporting Tool (eCart), used in prior years, is no longer used for this process. In addition, the BoS CoC continues to offer on-going technical assistance and trainings for providers to enhance their knowledge and understanding of the HMIS system.

# APPENDIX

**From:** [Amanda Berman](#)  
**To:** [Jayne Colino](#)  
**Cc:** [Shaylyn Davis](#); [Nika Sandal](#); [Barney Heath](#); [Kathleen Perreault](#)  
**Subject:** RE: public comment on FY23 Human Services recommended allocations  
**Date:** Saturday, May 28, 2022 8:59:00 AM

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Dear Jayne,

Thank you so much for your comments, and for the incredible work that you do for Newton's senior community. We have always valued the wonderful partnership that our department has with you and your team.

Regarding your suggestion to hold interviews with the applicants – on an annual basis, we receive upwards of 15 applications for the CDBG Human Service program, for approximately \$290,000 of funds. This year, we received 17 applications, totaling approximately \$587,000 in requested funds. As you know, these applications are quite lengthy and cover a vast amount of information and data related to the proposed project. Our review committee members carefully review each application individually and as a group before making a recommendation. We assess each proposal against multiple factors, including the Priority Areas of the program. In addition, volunteers from the Planning & Development Board sit in on the review to provide their feedback and suggestions. This process can take up to four weeks. While we have found this two-tiered review process to be quite thorough and effective, we will take your suggestion into consideration. It is important to note, however, that the addition of applicant interviews would likely add another two-plus weeks to the RFP cycle, pushing the start of the process into December, seven months prior to the start of the program year.

Regarding the other applicants that provide services to seniors - although Friends of 2Life Communities will run the only CDBG-funded program that exclusively serves seniors, it is important to note that Pathway to Possible, Riverside Community Care, Newton Housing Authority, and Newton Community Development Foundation will all operate programs that serve seniors as well. As you noted, many of these programs service residents already living in service-enriched housing, however, these programs do provide critical care coordination and programming offerings to the seniors residing in the housing communities themselves as well as the broader community. We will, however, be sure to consider programs exclusively serving seniors living in the community for future funding cycles. Thank you for providing that important distinction.

Thank you so much again for your comments. Please feel free to contact me via phone or email with further questions or concerns.

Sincerely,

Amanda Berman  
Pronouns: she/her/hers  
Director of Housing & Community Development  
Department of Planning & Development  
City of Newton  
617-796-1147 (Direct)

617-796-1120 (Dept)  
[aberman@newtonma.gov](mailto:aberman@newtonma.gov)  
[www.newtonma.gov/gov/planning](http://www.newtonma.gov/gov/planning)

***Please note that I am working remotely with access to email and voicemail. For updates on Newton's COVID-19 response, please visit:***

<https://www.newtonma.gov/government/health-human-services/public-health/covid-19>

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**From:** Jayne Colino <jcolino@newtonma.gov>  
**Sent:** Friday, May 13, 2022 2:07 PM  
**To:** Amanda Berman <aberman@newtonma.gov>  
**Cc:** Shaylyn Davis <sdavis@newtonma.gov>; Nika Sandal <nsandal@newtonma.gov>  
**Subject:** public comment on FY23 Human Services recommended allocations

Good Afternoon Amanda,

I want to let you know that we had a great monitoring visit with Shaylyn and Nika. I also want to thank you and your staff for the support ( and patience) we got while we figured out the best way to provide food access during the pandemic.

In my role as an advocate for older adults I wanted to share the comments I made to Shaylyn and Nika about the FY 23 recommended allocations for human service grants. I shared, obviously, that we were disappointed that our proposal was not funded. They helped me understand what went into the decision. I would like to suggest that in the future the review process might include an opportunity for an interview with the review committee. The applicants that are prioritized for funding would have the chance to clarify something in the application that would help the reviewers in their decision making.

I would like to share my disappointment that there was only one applicant funded that exclusively serves older adults. I have the greatest respect for 2Life Communities! However, the older adults who will benefit from this funding already live in a supportive housing environment. Newton Housing Authority and NCDF may use some of their funding to service seniors, but they also serve families with the funds. Again, those recipients are also already living in an environment that brings additional support and services to all their residents. I would hope that in future funding cycles that a strong consideration be given to agencies that serve older adults living in the community rather than to agencies that serve a finite population or who serve Newton only as part of the service area. More of Newton's vulnerable older adult population would be better served by a senior and/or social service agency that focuses on residents who live in the greater community that are likely to have more barriers to accessing the services they need.

Thanks you again for all you and CDBG does for the City!!

Jayne Colino, Director  
Newton Department of Senior Services

345 Walnut Street  
Newtonville, MA 02460  
Direct: 617-796-1671  
[www.newtonseniors.org](http://www.newtonseniors.org)  
Like us on [Facebook](#)

**CITIZEN PARTICIPATION PLAN**  
**CITY OF NEWTON HOUSING AND COMMUNITY DEVELOPMENT PROGRAM**  
*REVISED MAY 4, 2020, Approved at P&D Public Hearing*

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The City of Newton annually receives Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME) and Emergency Solutions Grant (ESG) funds from the U.S. Department of Housing and Community Development (HUD), which it administers through the Housing and Community Development Division of the Planning and Development Department. The primary purpose of these formula grant programs is to develop viable communities through the provision of decent housing, a suitable living environment and expanding economic opportunities for low- and moderate-income persons. As a recipient of these entitlement program funds, the City is required to produce the following documents:

- **Consolidated Plan** – a five-year plan that documents Newton’s housing and community development needs, outlines strategies to address those needs, and identifies proposed program accomplishments
- **Annual Action Plan** – an annual plan that describes specific CDBG-, HOME- and ESG-funded projects that will be undertaken over the course of the upcoming fiscal year
- **Consolidated Annual Performance and Evaluation Report (CAPER)** – an annual report that evaluates the use of CDBG, HOME and ESG funds following the close of the fiscal year
- **Analysis of Impediments to Fair Housing Choice** – a five-year plan that analyzes disparities in access to housing opportunities in the City and identifies priorities and goals to address these issues.

This Citizen Participation Plan has been developed to provide citizens and other interested parties with opportunities to participate in an advisory role in the planning, implementation and evaluation of the CDBG, HOME and ESG programs which primarily benefit Newton’s low- and moderate-income residents, and to review and comment on each of the documents listed above.

Citizen participation in CDBG, HOME and ESG program activities ranges from conducting needs assessments and strategic planning to providing input on project selection, development, implementation and evaluation. The Citizen Participation Plan outlines the City’s responsibility to solicit active citizen participation. The goals of the Citizen Participation Plan are to:

- Encourage citizen participation by all Newton residents, emphasizing the involvement of low- and moderate-income residents, persons with disabilities, minorities, non-English speaking persons and residents of assisted housing;
- Inform citizens of the Newton Consolidated Plan, CAPER, the Analysis of Impediments to Fair Housing Choice and the Annual Action Plan, including funds available from CDBG, HOME, ESG and other Continuum of Care Homeless Programs and eligible activities under these programs;
- Give all citizens an opportunity to identify and respond to priority needs;
- Give all citizens an opportunity to identify and respond to proposed projects, actions, policies and the use of funds; and
- Give all citizens an opportunity to review and comment on program performance.

## **1. Process for Citizen Participation**

Opportunities for citizen participation in the planning and development of the Newton Consolidated Plan, Analysis of Impediments to Fair Housing Choice, the Annual Action Plan, and the CAPER will be provided through several levels of community involvement and outreach, including:

### Individual Citizens

The participation of individual citizens is critical to the City of Newton's Housing and Community Development Program. Reasonable efforts will be employed to make all citizens aware of the Program-related meetings and events in their neighborhoods, as well as public hearings and citywide events that are related to the development of the Consolidated Plan, the Analysis of Impediments to Fair Housing Choice, the Annual Action Plan and the CAPER. It is the goal of the Program to create opportunities for participation for all interested citizens, including, but not limited to, low- and moderate-income residents, persons with disabilities, minorities, non-English speaking persons and residents of assisted housing.

### Newton Housing Partnership

While the Newton Housing Partnership plays a critical role in the review and evaluation of CDBG- and HOME-funded projects, it is also instrumental in shaping housing policy for the city as a whole. The Partnership's mission is to foster, support and initiate land use, planning and fiscal policies and actions that ensure the development and preservation of housing to serve a socially and economically diverse community. In order to fulfill its mission, the Partnership acts in an advisory capacity to the Mayor, the City Council and its committees, the Planning and Development Board, the Zoning Board of Appeals, the Community Preservation Committee and city staff. Consisting of up to 9 members, the Newton Housing Partnership represents Newton residents, organizations, businesses and institutions which are based in Newton or which serve the housing needs of Newton residents.

### Fair Housing Committee

The Fair Housing Committee works with the Mayor and City staff to promote, support and affirmatively further Newton's efforts to be a diverse and welcoming community with housing choices and opportunities free from housing discrimination. Acting in an advisory capacity to the Mayor, the City Council, and all applicable City departments, boards, and committees, this Committee aims to assure that policies and practices relating to fair housing are incorporated into City operations and community activities, as well as facilitate public education and outreach. The committee collaborates with City staff to spearhead the community participation process for the Analysis of Impediments to Fair Housing Choice, which will be completed once every five years. The Committee's bylaws allow the Mayor to appoint up to 11 members and residents, who represent Newton-based institutions, organizations, and businesses that serve the housing needs of Newton residents. The membership shall reflect the diversity of persons who are protected by civil rights laws, and shall include one or more persons with expertise in fair housing and civil rights laws.

### Commission on Disability

The mission of the Commission on Disability (COD) is to foster equal access to community life and activities for people with disabilities. Through education and advocacy, the Commission works with the Mayor and City staff to raise awareness about the needs of people with disabilities and the importance of increased accessibility to programs, housing and facilities in municipal and commercial



buildings, and other public entities. The COD informs project priorities and provides recommendations for use of Community Development Block Grant (CDBG) funds in projects that remove architectural barriers and increase accessibility throughout the City of Newton. Commission members are a diverse representation of Newton's disability population and include residents, representatives of organizations, as well as businesses and institutions, which are based in Newton and serve the needs of Newton residents. The COD consists of not less than 5 but no more than 9 members appointed by the Mayor.

#### Organizations, Agencies and the Newton Housing Authority

In developing a plan for the best use of CDBG, HOME and ESG funds, the Newton Housing and Community Development Program relies heavily on the input of other agencies involved in the development and implementation of projects to assist low- and moderate-income citizens, including the Newton Housing Authority, the Balance of State (BoS) Continuum of Care (CoC), many area nonprofit organizations and state housing and community development agencies. These agencies and organizations are encouraged to participate in the development of the Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan, and CAPER and are asked to review and comment on the proposed documents.

#### Planning and Development Board

The Planning and Development Board, acting as the Community Development Board, is the governing citizen body that considers the recommendations made by Division staff and City departments, other Newton agencies and organizations and citizens related to the CDBG, HOME and ESG Programs. Following a public hearing to allow for open discussion, the Planning and Development Board forwards their recommendations to the Mayor for final review and approval. When funding requests are made to the Planning and Development Board (while acting as the Community Development Board), representatives of the party requesting project funding and/or Division staff will present the proposal to the Board. The Public Hearing is held open during the 15- or 30-day comment period to ensure that public comments made during that timeframe are adequately considered by the Board before a final funding decision is made by the Mayor.

Public hearings on the proposed Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan and CAPER are conducted by the Board, as well as public hearings for proposed substantial amendments to the Consolidated Plan and/or Annual Action Plan. The Board is composed of residents of the City of Newton and is comprised of six full members (one of which is appointed by the state Secretary of Housing and Community Development), the Planning and Development Department Director (*ex officio*), and up to five alternate members. Unless their schedule is disrupted by a holiday or inclement weather, the Planning and Development Board meets on the first Monday of every month at Newton City Hall.

#### City Council

The City Council is the final citizen policy body that reviews and takes action on the Consolidated Plan and the Annual Action Plan. After receiving the plan from the Mayor, the City Council considers and then votes on approval of the submission of the proposed Plan and on acceptance of the CDBG, HOME and ESG grants from HUD. After the City Council votes, the Plan can be formally submitted to HUD.

## 2. Public Meetings and Public Hearings

Committees including, but not limited to, the Fair Housing Committee, COD and local meetings of the BoS CoC, conduct public meetings to solicit public input on the Housing and Community Development Program. All meetings are open to the public and participation is encouraged.

Public hearings are required by law in order to obtain the public's views and to provide the public with the City's responses to public questions and proposals. As stated earlier, the entity responsible for conducting public hearings for the Newton Housing and Community Development Program is the Planning and Development Board. As required by law, the Planning and Development Board holds at least two public hearings each year to solicit input on housing and community needs, to review proposed uses of funds and to assess how funds were spent during the previous program year.

The two public hearings are:

- Proposed Annual Action Plan public hearing (generally held in March or April)
- Annual performance public hearing for the proposed CAPER (generally held in September)

During the development of the Consolidated Plan and the Analysis of Impediments to Fair Housing Choice additional public hearings will be held.

The public hearings for the Consolidated Plan will cover:

- Proposed Citizen Participation Plan public hearing, where staff present proposed revisions to the existing Citizen Participation Plan;
- Needs Assessment public hearing for the Consolidated Plan, where staff describe the housing and community development needs that were identified through data analysis and community participation;
- Proposed Consolidated Plan public hearing, where staff reviews the content of the draft Consolidated Plan, including the amount of financial assistance the City expects to receive, the proposed projects that will be undertaken and the activities that will benefit low- and moderate income persons.

The public hearing for the Analysis of Fair Housing to Fair Housing Choice will cover:

- Disparities in housing opportunity that were identified through data analysis and community participation.
- Content, goals and strategies of the draft Analysis of Impediments to Fair Housing Choice.

In addition to the public hearings listed above, the Planning and Development Board will conduct a public hearing whenever a substantial change is proposed to the use of CDBG, HOME or ESG Program funds from that which was listed in the Consolidated Plan or Annual Action Plan.

A substantial Amendment is defined, in accordance with 24 CFR 91.505(a), as:

- A substantial change in allocation priorities (any change greater than 25 percent in an individual project's total budget) or a substantial change in the method of distribution of funds;
- A new activity (including those funded exclusively with program income) not previously covered by the Newton Consolidated Plan or Annual Action Plan; or a

- Substantial change in the purpose, scope, location or beneficiaries of an activity.

Public hearings are generally held at Newton City Hall and in locations that meets ADA accessibility standards. Reasonable accommodations will be made for people with disabilities upon request. Language interpreters will also be provided for non-English speaking participants upon advance notice.

Citizens and other interested parties may present oral comments at the time of the hearing and/or submit written comments for 30 days after the public hearing for the proposed Consolidated Plan, Annual Action Plan, Analysis of Impediments to Fair Housing Choice and any substantial or material changes and for 15 days after public hearings for the proposed Citizen Participation Plan and the CAPER. The City will consider the views of all citizens, organizations and agencies, and other interested groups in preparing the final Citizen Participation Plan, Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan and CAPER.

Following the public comment period, staff must submit a formal notification of the substantial amendment to the Mayor for approval. Once the Mayor certifies the notification, it is submitted to HUD.

### **3. Modified Citizen Participation Process for Substantial Amendments Related to Emergency or Disaster Response**

As specified above, the City may amend the approved Annual Action Plan and Consolidated Plan, in accordance to 24 CFR 91.505. Substantial amendments to these plans will be subject to the citizen participation process, and the City must provide citizens with 30 days to comment on the substantial amendments.

- **Comment Period:** In the event there is an emergency or disaster, in which a state of emergency is declared either at the federal, state, or local level, the City will allowed to engage in a modified citizen participation process in which a public hearing will be conducted with a shortened comment period of 5 days. The shortened comment period will allow the City to respond to an emergency or disaster in a timely manner
- **Virtual Public Hearing and Public Meetings:** In the event there is an emergency or disaster, in which a state of emergency is declared either at the federal, state, or local level, the City will conduct public meetings and public hearings virtually to ensure public safety. Virtual public hearings and public meetings will allow for questions in real time, with answers coming directly from the elected representatives to all “attendees”, via a virtual hearing method or platform that provides for accessibility for persons with disabilities and LEP to participate.

### **4. Notice of Meetings**

All public meetings and public hearings are open to the public. Participation is encouraged. The following paragraphs describe the efforts that will be made to notify the public of public meetings and public hearings.

#### Public Meetings

Meeting notices are mailed or e-mailed to appointed members at least seven calendar days prior to meeting date. All meeting notices are posted on the Electronic Posting Board and Public Notice Board on the first floor of Newton City Hall within 48 hours of the scheduled meeting, and are listed in the Planning and Development Department's weekly "Friday Report," which is e-mailed or mailed to City officials, agency/organization representatives and residents.

#### Public Hearings of the Planning and Development Board

- Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan and CAPER

Public notices for public hearings for the proposed Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan, and CAPER will be advertised in the *Newton TAB* at least ten calendar days prior to each hearing. Meeting notices for the Consolidated Plan, Annual Action Plan, and CAPER will be e-mailed or mailed to Board members and posted on the Electronic Posting Board, the City webpage relevant to the subject matter (i.e <http://www.newtonma.gov/fairhousing> ), and the Public Notice Board, and broadcast on the television monitor, both located on the first floor of City Hall. Notice will also be provided on the City's website in the City Calendar and listed in the Planning and Development Department's weekly "Friday Report" which is e-mailed or mailed to City officials, agency/organization representatives and residents.

- Amendments to the Proposed Use of Funds

Notices for public hearings for amendments to the use of funds proposed in the Consolidated Plan and/or Annual Action Plan will be e-mailed or mailed to Board members. Notice will also be posted on the Electronic Posting Board, the Public Notice Board and broadcast on the television monitor on the first floor of City Hall. Notice will also be provided on the City's website in the City Calendar and listed in the Planning and Development Department's weekly "Friday Report" which is e-mailed or mailed to City officials, agency/organization representatives and residents.

#### **5. Availability of the proposed Citizen Participation Plan, Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan, and CAPER**

Notice of the availability of the proposed Citizen Participation Plan, Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan, and CAPER will be published in the *Newton TAB* at least ten calendar days prior to the public hearing. The notice will summarize the content and purpose of these proposed documents and will include a list of locations where copies of the documents may be examined. At a minimum, copies of the proposed Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan, and CAPER will be available in the Newton Housing and Community Development Office and on the Housing and Community Development Division's section of the Planning and Development Department's web page, located at <http://www.newtonma.gov/cdbg> and on the Planning and Development Department's Special Reports and Studies web page:

[http://www.newtonma.gov/gov/planning/resources/special\\_reports\\_n\\_studies.asp](http://www.newtonma.gov/gov/planning/resources/special_reports_n_studies.asp).

## 6. Access to Information

In addition to opportunities to make oral comments at public meetings and/or public hearings before the Planning and Development Board, any citizen, organization, agency or other interested party may submit written requests for information and submit written comments regarding the proposed Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan, and CAPER, and/or amendments to each, including the proposed use of funds and the benefit to low- and moderate-income residents. Copies of documents will be made available in other languages and/or in other formats (i.e. larger print) upon request. Documents from prior years will also be available upon request for at least the preceding five years.

Additionally, plans to minimize displacement and assist those displaced as a result of the activities in the Consolidated Plan and the Annual Action Plan are attached to this document.

## 7. Comments

Citizens, organizations, agencies and other interested parties are encouraged to submit their comments on the proposed Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan and CAPER. All comment periods will begin the day of the public hearing held by the Planning and Development Board. Minimum comment periods are listed below:

Type of Public Hearing	Comment Period
Consolidated Plan	30 calendar days
Annual Action Plan	30 calendar days
CAPER	15 calendar days
Analysis of Impediments to Fair Housing Choice	30 calendar days
Substantial Amendments to Consolidated Plans and Annual Action Plans	30 calendar days

The City of Newton will consider all comments in preparing its final Citizen Participation Plan, Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan and CAPER for submission to HUD, and will include a summary of all comments received and the actions taken to address each comment.

Comments may be submitted via mail, e-mail or fax to:

Housing and Community Development Division  
Newton Planning and Development Department  
1000 Commonwealth Avenue  
Newton, MA 02459  
Fax: 617-796-1142  
Phone: 617.796.1120, TDD/TTY 617-796-1089

## 8. Timely Response

The City of Newton will respond in writing within 15 calendar days to any written comments, questions or complaints received regarding the Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan, CAPER or the Newton Housing and Community Development Program in general.

## **9. Technical Assistance**

Upon request, Newton Housing and Community Development Division staff will provide technical assistance to groups representing low- and moderate-income persons to develop funding requests for CDBG-, HOME- or ESG-eligible activities.

## **10. Use of the Citizen Participation Plan**

The City of Newton will be required to adhere to this Citizen Participation Plan, once adopted, as the official mechanism for obtaining citizen input into the Consolidated Plan process and during the administration of the programs covered by this Plan.

## **11. Jurisdiction Responsibility**

The requirements for citizen participation shall not restrict the responsibility or authority of the jurisdiction for the development and execution of its Consolidated Plan. The sole and final responsibility and authority to make determinations regarding the City's CDBG, HOME and ESG funding rests exclusively with the Mayor.

## **12. HUD Waivers Related to CARES Act**

On March 27, 2020, President Trump signed the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136. As authorized by the CARES Act, the City will receive FY20 Community Development Block Grant Coronavirus (CDBG-CV) funds and Emergency Solutions Grant Coronavirus (ESG-CV) funds to prevent, prepare for, and respond to the coronavirus (COVID-19). In addition, the CARES Act adds additional flexibility for the use of FY20 CDBG-CV funds and as it relates to the annual FY21 (FFY20) CDBG funds during these unprecedented times.

Waivers provided by HUD related to the Citizen Participation Plan and the Consolidated Plan are detailed below. Newton submitted a formal request to HUD on April 9, 2020 for the use of these two waivers:

### **a. Citizen Participation Public Comment Period for Consolidated Plan and Annual Action Plan Amendments**

A HUD CPD grantee may amend an approved consolidated and annual action plan in accordance with 24 CFR 91.505. Substantial amendments to these plans are subject to the citizen participation process in the grantee's citizen participation plan (CPP). The citizen participation plan must provide citizens with 30 days to comment on substantial amendments.

Given the need to expedite actions to respond to COVID-19, HUD has waived this requirement in order to balance the need to respond quickly to the growing spread and effects of COVID-19 with the statutory requirements to provide reasonable notice and opportunity for citizens to comment on substantial amendments concerning the proposed uses of CDBG, HOME or ESG funds.

**Waiver:** This 30-day minimum for the required public comment period is waived for substantial amendments, provided that no less than 5 days are provided for public comments on each substantial amendment.

**Timeframe:** This waiver is available from April 13, 2020 through the end of the recipient's 2020 program year (June 30, 2021).

#### **b. Citizen Participation Reasonable Notice and Opportunity to Comment**

For substantial amendments to the consolidated and annual action plan, HUD's regulations require the recipient to follow its citizen participation plan (CPP) to provide citizens with reasonable notice and opportunity to comment, and must also state how reasonable notice and opportunity to comment will be given.

Given governmental orders to limit public gatherings, HUD has provided waivers to allow grantees to determine what constitutes reasonable notice and opportunity to comment given their circumstances.

**Waiver:** This waiver provides that grantees may amend citizen participation plans to establish expedited procedures to draft, propose, or amend consolidated plans. Expedited procedures must include notice and reasonable opportunity to comment of no less than 5 days. The 5-day period can run concurrently for comments on the consolidated plan and annual action plan amendment and amended citizen participation plans.

In-person public hearings are not required. Grantees may meet public hearing requirements with virtual public hearings if: 1) national/local health authorities recommend social distancing and limiting public gatherings for public health reasons; and 2) virtual hearings provide reasonable notification and access for citizens in accordance with the grantee's certifications, timely responses from local officials to all citizen questions and issues, and public access to all questions and responses.

**Timeframe:** This waiver is in effect from April 13, 2020 through the end of the recipient's 2020 program year (June 30, 2021).

Given governmental orders to limit public gatherings and the need for expedited decision making related to the use of CDBG-CV funds, the following paragraph describes the efforts to notify the public of the public meetings and public hearings during this time:

- Notices for public hearings for amendments to the use of funds proposed in the Consolidated Plan and/or Annual Action Plan will be e-mailed to Board members.
- Notice will be posted on the Electronic Posting Board.
- Notice will be provided on the City's website in the City Calendar
- Notice will be listed in the Planning and Development Department's weekly "Friday Report" which is e-mailed to City officials, agency/organization representatives and residents.

During this time, public meetings and public hearings shall be conducted virtually to ensure public safety. Public hearings will allow for questions in real time, with answers coming directly from the elected representatives to all "attendees", via a virtual hearing method or platform that provides for accessibility for persons with disabilities and LEP to participate.

Copies of the proposed Consolidated Plan, Analysis of Impediments to Fair Housing, CAPER, Annual Action Plan will only be made available on the City's website, [www.newton.com/CDBG](http://www.newton.com/CDBG).



## **ANTI-DISPLACEMENT AND RELOCATION PLAN**

(attached to the Citizen Participation Plan)

### **Permanent Relocation**

It is the policy of the City of Newton Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) programs and the WestMetro HOME Consortium to take all reasonable steps to minimize displacement as a result of CDBG- and HOME-assisted projects, including:

- Considering whether displacement will occur during feasibility determinations
- Identifying potential relocation workload and resources early
- Assuring, whenever possible, that residential occupants of buildings rehabilitated are offered an opportunity to return
- Planning rehabilitation projects to include “staging” where this would eliminate temporary displacement
- Following notification procedures carefully so that families do not leave because they are not informed about planned projects or their rights

When a project does require relocation, in order to ensure the timely issuance of information notices to displaced households, etc., staff of the City of Newton Housing and Community Development Division or of the WestMetro HOME Consortium member communities will ensure that all notices are sent in compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA).

### **Temporary Relocation**

Temporary relocation often occurs as the result of lead abatement and other rehabilitation activities in renter- and owner-occupied units. Although the City of Newton Housing and Community Development Division is not required to, in most cases it pays for the temporary relocation of displaced renters and/or homeowners whose residences are being rehabilitated.

# **CITIZEN PARTICIPATION PLAN**

## **WESTMETRO HOME CONSORTIUM CITIZEN PARTICIPATION PLAN**

### **REVISED MARCH 2018**

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The City of Newton, the lead entity for the WestMetro HOME Consortium, annually receives HOME Investment Partnerships Program (HOME) funds from U.S. Department of Housing and Community Development (HUD), which it administers on behalf of the WestMetro HOME Consortium member communities. The purpose of the HOME Program is to provide funds for a wide range of activities that create affordable housing opportunities for low- and moderate- income people. As a recipient of these formula grant funds, the HOME Consortium is required to produce the following documents:

- Consolidated Plan – a five-year plan that documents each community’s housing needs, outlines strategies to address those needs, and identifies proposed program accomplishments
- Annual Action Plan – an annual plan that describes specific HOME-funded projects that will be undertaken over the course of the upcoming fiscal year
- Consolidated Annual Performance and Evaluation Report (CAPER) – an annual report that evaluates the use of HOME funds
- Analysis of Impediments to Fair Housing Choice – a five-year plan that analyzes disparities in access to housing opportunities and identifies priorities and goals to address these issues.

This Citizen Participation Plan has been developed to provide citizens and other interested parties with opportunities to participate in an advisory role in the planning, implementation and evaluation of the HOME program and to review and comment on each of the documents listed above.

Citizen participation ranges from conducting needs assessments and strategic planning to project selection, development, implementation and evaluation. The Citizen Participation Plan outlines the City’s responsibility for providing opportunities for active citizen participation. The goals of the Citizen Participation Plan are to:

- Encourage citizen participation by all residents of the Consortium-member communities, emphasizing the involvement of low- and moderate-income residents, people with disabilities, minorities and residents of assisted housing;
- Inform citizens of the Consolidated Plan, Analysis of Impediments to Fair Housing Choice, and the Annual Action Plan, including funds available from the HOME program and eligible activities under the program;
- Give all citizens an opportunity to identify and respond to priority needs;
- Give all citizens an opportunity to identify and respond to priority proposed projects and the use of funds; and
- Give all citizens an opportunity to review and comment on program performance.

This is the overall Citizen Participation Plan for the WestMetro HOME Consortium. Member communities must meet the minimum requirements set forth herein. However, members are free to add opportunities for citizen participation beyond those required here.

Please note that the Consortium’s Consolidated Plan and subsequent Annual Action Plans will cover *only* housing planning and HOME programming for the Consortium member communities. The plans will also include Newton’s Community Development Block Grant (CDBG) and Emergency Solutions Grant (ESG)

programs, as well as planning and programming for other programs. The other Consortium members will develop separate *non-housing plans*, as appropriate, and these will be submitted to HUD with the Consortium Plan, but will be separate documents.

## **1. Process for Citizen Participation**

Participation by citizens, agencies and other interested parties in the process of developing the Consortium's Citizen Participation Plan, Consolidated Plan, the Analysis of Impediments to Fair Housing Choice, Annual Action Plan, and CAPER and will be encouraged by both the Consortium and by individual member communities. All meetings and draft public documents will receive the broadest possible circulation and notice to encourage participation, especially by residents in the lowest income brackets, by minorities and non-English speaking persons, as well as persons with mobility, visual or hearing impairments. Each member will work with its local public housing authority to encourage the participation of public and assisted housing residents.

Reasonable accommodations will be made for people with disabilities upon request. Language interpreters will be provided for non-English speaking participants upon advance request.

## **2. Public Hearings**

Public participation will be provided at the following public hearings to be held by the Consortium before the Newton Planning and Development Board at Newton City Hall in an accessible location. Hearings may be combined; however, no less than two public hearings will be conducted during the program year.

- Proposed Citizen Participation Plan public hearing
- Proposed Housing Needs public hearing
- Proposed Housing Strategies public hearing
- Proposed Consolidated Plan/Annual Action Plan public hearing
- Annual Performance Public Hearing for the proposed CAPER
- Proposed Analysis of Impediments to Fair Housing Choice public hearing

In addition to the public hearings listed above, member communities will also conduct public hearings in their own community whenever a substantial change is proposed to the use of HOME Program funds from that which was listed in the Consolidated Plan or Annual Action Plan. Member communities shall give notice of the proposed change to the City of Newton, which will submit the required notification to HUD once the hearing has been held and the change has been approved.

A substantial change is defined, in accordance with 24 CFR 91.505(a), as:

- A substantial change in allocation priorities (any change greater than 25 percent in an individual project budget) or a substantial change in the method of distribution of funds;
- An activity (including those funded exclusively with program income) not previously covered by the Consolidated Plan or Annual Action Plan; or a
- Substantial change in the purpose, scope, location or beneficiaries of an activity.

In addition to public hearings for a substantial change, additional hearings may be held by Consortium member communities to solicit input on proposed Plans.

Citizens and other interested parties may present oral comments at the time of the hearing and/or

submit written comments for 30 days after the public hearing for the proposed Consolidated Plan, Analysis to Fair Housing Choice, Annual Action Plan, and any substantial amendments, and for 15 days after public hearings for the proposed Citizen Participation Plan and CAPER. The Consortium will consider the views of all citizens, organizations and agencies, and other interested groups in preparing the final Citizen Participation Plan, Consolidated Plan, Annual Action Plan and CAPER.

### **3. Notice of Meetings**

Public notices for public hearings for the proposed Citizen Participation Plan, Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan, and CAPER and will be advertised in the following newspapers at least ten days prior to each hearing.

#### **Newspaper**

- Newton TAB
- Bedford Minuteman
- Belmont Citizen Herald
- Brookline TAB
- Framingham TAB
- Lexington Minuteman
- Lincoln Journal
- Natick Bulletin
- Needham Times
- Sudbury Town Crier
- Waltham News Tribune
- Watertown TAB & Press
- Wayland Town Crier

Public notices for substantial changes will be advertised in the affected community's newspaper by the affected community at least seven days prior to the hearing.

Additionally, at a minimum, meeting notices for public hearings for the proposed Citizen Participation Plan, Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan and CAPER will be e-mailed or mailed to Planning and Development Board members and posted on the Electronic Posting Board and Public Notice Board, on the first floor of Newton City Hall within 48 hours of the scheduled meeting. Notice will also be provided on the front page of the City of Newton's website and listed in the Newton Planning and Development Department's weekly "Friday Report" which is e-mailed or mailed to City officials, agency/organization representatives and residents. Consortium member communities may supplement these outreach efforts.

### **4. Availability of the proposed Citizen Participation Plan, Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan and CAPER**

Notice of the availability of the proposed Citizen Participation Plan, Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan, and CAPER will be published in the newspapers listed above at least ten days prior to the public hearing. The notice will summarize the purpose of these proposed documents and will include a list of locations where copies of the documents may be examined. At a minimum, copies of the proposed Citizen Participation Plan, Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan and CAPER will be available in the Newton Housing and Community Development Office and on the Housing and on the Community Development Division's section of the Newton Planning and Development Department's web page, located

at <http://www.newtonma.gov/gov/planning/hcd/default.asp>

## 5. Access to Information

In addition to opportunities to make oral comments at public hearings before the Newton Planning and Development Board, any citizen, organization, agency or other interested party may submit written requests for information and submit written comments regarding the proposed Citizen Participation Plan, Consolidated Plan, Analysis of Impediments to Fair Housing Choice,, Annual Action Plan and CAPER, and amendments to each, including the proposed use of funds and the benefit to low- and moderate-income residents. Copies of documents will be made available in other languages and/or in other formats (i.e. larger print) upon request. Documents from prior years will also be available upon request for at least the preceding five years.

Additionally, plans to minimize displacement and assist those displaced as a result of the activities in the Consolidated Plan and the Annual Action Plan are attached to this document.

## 6. Comments

Citizens, organizations, agencies and other interested parties are encouraged to submit their comments on the proposed Citizen Participation Plan, Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan and CAPER. All comment periods will begin the day of the public hearing held by the Newton Planning and Development Board. Minimum comment periods are listed below:

TYPE OF PUBLIC HEARING	COMMENT PERIOD
Consolidated Plan	30 calendar days
Analysis of Impediments to Fair Housing	30 calendar days
Annual Action Plan	30 calendar days
CAPER	15 calendar days
Substantial Changes	30 calendar days

The City of Newton, on behalf of the Consortium and working with member communities, will consider all comments in preparing its final Citizen Participation Plan, Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan and CAPER for submission to HUD, and will include a summary of all comments received and the actions taken to address each comment.

Comments may be submitted via mail, e-mail or fax to:

Rachel Powers, Community Development Program Manager  
Newton Housing and Community Development Program  
Planning and Development Department  
1000 Commonwealth Avenue  
Newton, MA 02459  
E-mail: [rpowers@newtonma.gov](mailto:rpowers@newtonma.gov)/ Fax: 617-796-1142

## **7. Timely Response**

The City of Newton, on behalf of the Consortium and working with member communities, will respond in writing within 15 days to any written comments, questions or complaints received regarding the Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan, CAPER or the HOME Program in general.

## **8. Technical Assistance**

Upon request, Consortium staff will provide technical assistance to groups representing low- and moderate-income persons to develop funding requests for HOME-eligible activities.

## **9. Use of the Citizen Participation Plan**

The City of Newton and the HOME Consortium member communities will be required to adhere to this Citizen Participation Plan, once adopted, as the official mechanism for obtaining citizen input into the Consolidated Plan process and during the administration of the HOME Program covered by this Plan.

## **10. Jurisdiction Responsibility**

The requirements for citizen participation shall not restrict the responsibility or authority of the City of Newton or the HOME Consortium member communities for the development and execution of the Consolidated Plan for the WestMetro HOME Consortium.

## **WESTMETRO HOME CONSORTIUM ANTI-DISPLACEMENT AND RELOCATION PLAN**

### **Permanent Relocation**

It is the policy of the City of Newton Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) programs and the WestMetro HOME Consortium to take all reasonable steps to minimize displacement as a result of CDBG- and HOME-assisted projects, including:

- Considering whether displacement will occur during feasibility determinations
- Identifying potential relocation workload and resources early
- Assuring, whenever possible, that residential occupants of buildings rehabilitated are offered an opportunity to return
- Planning rehabilitation projects to include “staging” where this would eliminate temporary displacement
- Following notification procedures carefully so that families do not leave because they are not informed about planned projects or their rights

When a project does require relocation, in order to ensure the timely issuance of information notices to displaced households, etc., staff of the City of Newton Housing and Community Development Division or of the WestMetro HOME Consortium member communities will ensure that all notices are sent in compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA).

### **Temporary Relocation**

Temporary relocation often occurs as the result of lead abatement and other rehabilitation activities in renter- and owner-occupied units. Although the City of Newton Housing and Community Development Division is not required to, in most cases it pays for the temporary relocation of displaced renters and/or homeowners whose residences are being rehabilitated.

# City of Newton Emergency Solutions Grant

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## WRITTEN STANDARDS FOR PROVISION OF ESG ASSISTANCE

### OVERVIEW

In accordance with federal regulations set forth in 24 CFR Part 567, the City of Newton's Department of Planning and Development has developed the following written standards guiding the provision and prioritization of Emergency Solutions Grant (ESG) funding.

The City of Newton receives ESG funds annually from the U.S. Department of Housing and Urban Development (HUD) under the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act), enacted into law on May 20, 2009. The ESG program supports eligible activities that enable communities to prevent homelessness, identify sheltered and unsheltered homeless persons, as well as those at-risk of homelessness, and provide the supportive services necessary to ensure that homeless individuals and families are rapidly rehoused and move toward independent living.

ESG provides funding to: (1) engage homeless individuals and families living on the street; (2) improve the number and quality of emergency shelters for homeless individuals and families; (3) help operate these shelters; (4) provide essential services to shelter residents, (5) rapidly re-house homeless individuals and families, and (6) prevent families/individuals from becoming homeless.

Newton's ESG funds may be used for the following eligible program components:

- **Emergency Shelter Services –**
  - Essential Services for individuals and families currently residing in an emergency shelter;
  - Shelter Operations generally include operating costs, such as maintenance, rent security, fuel, equipment, insurance utilities, and furnishings;
  - Renovation of a building to serve or that currently serves as an emergency shelter.
- **Homelessness Prevention - Housing relocation and stabilization services and/or short-and/or medium-term rental assistance** as necessary to prevent an individual or family from moving into an emergency shelter or meeting HUD's homeless definition.
- **Rapid Re-housing - Housing relocation and stabilization services and short-and/or medium-term rental assistance** as necessary to help individuals and families currently living in an emergency shelter or other places not meant for human habitation move as quickly as possible into permanent housing and achieve stability in that housing.
- **Street Outreach - Essential Services** necessary to reach out to **unsheltered** homeless individuals and families, connect them with emergency shelter, housing, or critical services, and provide them with urgent, non-facility-based care.



# City of Newton Emergency Solutions Grant

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- **Street Outreach - Essential Services** necessary to reach out to **unsheltered** homeless individuals and families, connect them with emergency shelter, housing, or critical services, and provide them with urgent, non-facility-based care.

Service providers contracted with the City of Newton to provide services in conjunction with the ESG must become thoroughly familiar with all regulations promulgated by the United States Department of Housing and Urban Development (HUD) governing the ESG program and the enclosed written standards. *[See, in particular, 24 CFR Part 576 – Emergency Solutions Grant Program.]* The provider is responsible for implementing the service in accordance with these regulations. The following standards are essential but are not exhaustive of HUD requirements.

# Table of Contents

- [I.](#) Standard Policies and Procedures for Evaluating Individuals’ and Families’ Eligibility for Assistance under ESG ..... 4
- [II.](#) Policies and procedures for coordination among providers..... 7
- [III.](#) Standards for targeting and providing essential services related to street outreach ..... 8
- [IV.](#) Policies and Procedures for Admission, Diversion, Referral, Operation, and Discharge by Emergency Shelters Assisted under ESG..... 9
- [V.](#) Determining and Prioritizing which Eligible Families and Individuals will Receive Homelessness Prevention Assistance and which Eligible Families and Individuals will Receive Rapid Re-Housing Assistance..... 10
- [VI.](#) Determining the Share of Rent and Utilities Costs that Each Program Participant Must Pay, if any, While Receiving Homelessness Prevention or Rapid Re-Housing Assistance ..... 12
- [VII.](#) Standards for Determining How Long a Particular Program Participant will be provided with Financial Assistance and whether and How the Amount of that Assistance will be Adjusted Over Time ..... 13
- [VIII.](#) Habitability, Sanitation, Safety and Lead-Based Paint Standards ..... 14
- [IX.](#) Fair Housing and Affirmative Outreach..... 15
- [X.](#) Matching Funds..... 16
- [XI.](#) Termination of Assistance..... 17
- [XII.](#) Forms and Attachments ..... 17

## I. Standard Policies and Procedures for Evaluating Individuals' and Families' Eligibility for Assistance under ESG

The Massachusetts [Balance of State Continuum of Care](#) (BoS CoC) has developed and implemented a Coordinated Entry System, to facilitate the process of assessing the housing needs of individuals experiencing homelessness and meeting those housing needs. All applicants are processed through this standard centralized or coordinated assessment system, as required by HUD in 24 CFR 576.400(d). *(Note: A victim service provider may choose not to use the Continuum of Care's centralized or coordinated assessment system.)* The goal of the Coordinated Entry process is to provide each consumer with adequate services and support to meet their housing needs, with a focus on returning them to housing as quickly as possible.

ESG subrecipients and service providers, unless noted as an exception, are required to complete the BoS CoC Coordinated Entry Vulnerability Assessment, the Consent and Release Form, and the Housing Preference Form. Assessment packets may be requested by calling Massachusetts Department of Housing and Community Development (DHCD) at 617-573-1100 or downloading from the CoC's website at <http://www.mass.gov/hed/housing/stabilization/continuum-of-care-programs.html>. The evaluation contains the basic information about the barriers and vulnerabilities of each assessed person who has not yet been housed. Vulnerabilities incorporated into the list include length of homelessness, disabilities, and chronic medical conditions. Referrals to the CoC-funded Permanent Supportive Housing projects are made in order of vulnerability as vacancies occur.

Completed packets are then sent to the Federal Grants Unit, Division of Housing and Stabilization, DHCD, 100 Cambridge Street, Suite 300, Boston, MA 02114, or scanned and emailed to [DHCDcocapplications.mass.gov](mailto:DHCDcocapplications.mass.gov). Once the project receives the referral from the Coordinated Entry Registry, they will arrange an intake interview. Coordinated Entry Staff will also contact the consumer to assure that the connection has been made. The project staff will review the referred person's case for eligibility and may reject them only if they are found to be ineligible. If agencies have any questions or concerns related to the Coordinated Entry system, they may call the Federal Grants Unit at (617) 573-1390.

### 1a. Emergency Shelter

Applicants entering into the emergency shelter system must meet the HUD criteria for defining homelessness as described in 24 CFR 91.5 and 24 CFR 576.2 and in Attachment 1 entitled "Criteria for Defining Homelessness." Clients will be prioritized within the shelter system based on need and available resources. Requirements are further described in Section IV.

### 1b. Street Outreach

Eligible clients include people who qualify as 'unsheltered homeless,' based on Category 1 ("Literally Homeless") of the "homeless" definition found at 24 CFR 576.2 (and in Attachment 1, Criteria for Defining Homelessness). Services must coincide with requirements as outlined below in Section III and 24 CFR 576.101.

1c. *Homelessness Prevention/Rapid Re-Housing*

To be eligible for homelessness prevention, an applicant must meet the standards for at-risk of homelessness as defined in 24 CFR 91.5 and 24 CFR 576.2. (Please also see Attachment 2, Criteria for Defining At-Risk of Homelessness). Furthermore, applicants must have an annual income at or below 30% of Area Median Income (AMI).

<b>FY 2021 Income Limits</b>	
<b>Household Size</b>	<b>30% Extremely-Low Income Limits</b>
<b>1</b>	\$28,200
<b>2</b>	\$32,200
<b>3</b>	\$36,250
<b>4</b>	\$40,250
<b>5</b>	\$43,500
<b>6</b>	\$46,700
<b>7</b>	\$49,950
<b>8 or more</b>	\$53,150

Effective April 1, 2021

The standard that must be used for calculating annual income is established in 24 CFR 5.609. Applicants are eligible for future services only if they have no other housing subsidies from local, state, or federal sources and have no other viable resources to keep or obtain housing. The City of Newton may establish other priorities to be applied to applicants.

Program participants seeking rapid re-housing must meet HUD criteria for defining homelessness (please see Attachment 1, Criteria for Defining Homelessness) and can be either be shelter or street homeless. If eligible, funds may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability. Furthermore, participants within the Brookline-Newton-Waltham-Watertown region will be prioritized for homelessness prevention and rapid rehousing assistance.

1d. *Case Management and Re-evaluation*

Every eligible program participant or household is to be assigned a case manager or referred to an agency within the community that can provide equivalent care. It is required that the case manager or agency have experience in working with people who are homeless or at-risk of homelessness.

The case manager must work directly with each participant or household, to accomplish the following:

- Determination of the appropriate type of service needed and the amount of financial assistance that is required using guidelines approved by the City of Newton;
- Development of both a short-term and long-term service plan;
- Counseling concerning housing needs;

- Monitoring and evaluating program participant's progress, meeting no less than once a month to assist the participant's long-term housing stability needs;
- Credit repair (including credit counseling, budget management, debt management, and making realistic financial choices);
- Communication with landlords and utility companies;
- Assurance that program participants are receiving necessary services from essential service providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service providers, including schools, childcare services, legal services, financial resources, health and mental health services, dispute resolution, etc;
- Obtaining all needed local, state, and federal services to benefit the program participant, including public housing, employment assistance and job training, Supplemental Nutrition Assistance Program (SNAP), Supplemental Security Income (SSI) or Social Security Disability Insurance (SSDI), Transitional Aid to Families with Dependent Children (TAFDC), Medicaid [*MassHealth in Massachusetts*], Women, Infants, and Children (WIC), etc. The case manager is responsible for referrals and working agreements for on-going collaboration and cooperation. All program participants must have full access to mainstream resources; and
- The development of a longer-term housing stability plan to extend beyond completion of ESG support is required.

Case managers assigned to homelessness prevention and rapid-rehousing programs must also re-evaluate the program participant's eligibility for services and the amount of financial assistance required:

- No less than every three months for participants receiving homelessness prevention assistance;
- No less than once annually for participants who are receiving rapid re-housing assistance; and

At a minimum, Re-evaluations of each program participants' eligibility must establish that:

- The program participant does not have an annual income that exceeds 30% AMI, as determined by HUD; and
- The program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance.

## **II. Policies and procedures for coordination among providers**

Recipients and subrecipients of ESG and funds authorized under the McKinney-Vento Homeless Assistance Act (Continuum of Care funding) must coordinate and integrate, to the maximum extent practicable, funded activities and services with mainstream housing, health, social services, employment, education, and youth programs for which homeless and at-risk families and individuals may be eligible. Strategies must include continued collaboration between housing and service providers, such as the Massachusetts Department of Mental Health (DMH), Department of Developmental Services (DDS), Department of Children and Families (DCF), Department of Public Health (DPH), Bureau of Substance Abuse Services, Newton Public Schools or applicable school district, local healthcare providers, transportation officials, workforce development, children/family service providers, and case management providers. Funded agencies will ensure that program participants access appropriate benefits and services, including, but not limited to Section 8, Public Housing, HOME Investment Partnership (HOME), the Workforce Investment Act, WIC, SNAP, and Temporary Assistance for Needy Families (TANF) programs.

The City communicates and coordinates with the BoS CoC concerning all the relevant points of services to be provided, performance standards, and policies and procedures for the operation and administration of the Homeless Management Information System (HMIS). Additionally, funding allocations are aligned with the priorities, needs, and strategies of the Continuum.

Except where statutorily exempt, all data on persons served and activities assisted under the ESG must be entered into the applicable community-wide HMIS in accordance with the data and technical standards established by HUD. Staff must input pertinent data detailing all services provided into one uniform HMIS client data tracking system. In the case of victim services providers, however, data is to be entered into an HMIS Comparable Database. All data reported to HUD is to be compiled from HMIS or the comparable database. All provider agencies offering ESG services are responsible for overseeing the operation of the HMIS and assuring that all relevant data is entered in the system.

### III. Standards for targeting and providing essential services related to street outreach

ESG-funded **Street Outreach** targets unsheltered individuals and families within the Brookline-Newton-Waltham-Watertown geography. As set forth in 24 CFR 576.101, funding may be used to provide the essential services necessary to reach out to unsheltered homeless people, connect them with emergency shelter, housing, or critical services, and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. Eligible services consist of engagement, case management, emergency health and mental health services, services for special populations, and transportation.

Subrecipients must determine an individual or family's vulnerability and/or ability to access emergency shelter, housing, or health care facility to ensure that assistance is granted toward those demonstrating the greatest need. After the initial assessment of needs and eligibility, activities consist of providing crisis counseling, addressing urgent needs, and actively connecting homeless persons to information, referrals, and resources.

Funds may be used to provide services for special populations, including youth, victims of domestic violence, and people with HIV/AIDS so long as the costs are eligible as defined above.



#### **IV. Policies and Procedures for Admission, Diversion, Referral, Operation, and Discharge by Emergency Shelters Assisted under ESG**

The **Emergency Shelter Services** component of ESG, as set forth in 24 CFR 576.102, may be used to provide essential services to homeless families and individuals in emergency shelters, to renovate buildings to be used as emergency shelter for homeless families and individuals, and to operate emergency shelters. Services generally consist of case management, childcare, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services, and transportation.

Subrecipients and service providers must conduct the initial evaluation and determine if individuals and families meet one of the four (4) categories of homelessness, as detailed in the attached and further defined in 24 CFR 576.2. Following the evaluation and program triage, service providers must determine whether the participant is to be admitted to emergency shelter, diverted to a provider of other ESG-funded components, like homelessness prevention or rapid re-housing and/or connected to applicable supportive services and mainstream resources. Once admitted, emergency shelter program participants must be reassessed on an ongoing basis to determine the earliest possible time that they can be discharged into permanent housing. Subrecipients must work with program participants regularly in identifying their most critical needs, housing, and stabilization options.

In accordance with HMIS policy, all data must be logged on services provided, referrals, and discharges. Additionally, all facilities must meet the minimum standards with regards to sanitation, safety, habitability, and access as specified in 24 CFR 576.403 and Section VIII of the enclosed ESG Written Standards.

Funds may be used to provide services for special populations, including youth, victims of domestic violence, and people with HIV/AIDS so long as the costs are eligible as defined above.

## V. **Determining and Prioritizing which Eligible Families and Individuals will Receive Homelessness Prevention Assistance and which Eligible Families and Individuals will Receive Rapid Re-Housing Assistance**

Unlike other interventions, prevention occurs before a household falls into homelessness. It is recommended that the highest priority applicants for homelessness prevention would be those living in a habitable unit but who have been notified in writing that they are being evicted within twenty-one (21) days after the date of their application for assistance. Newton ESG **Homelessness Prevention Program** Subrecipients are responsible for screening and determining eligibility for homelessness prevention. Eligibility for ESG services must be determined based on the eligibility criteria established by HUD. Households who do not meet required ESG eligibility standards are not eligible for services.

Newton's ESG **Rapid Rehousing Program** provides assistance with rent, security deposit, and other financial needs as well as supportive services to help people enter into an apartment. The highest-priority applicants for rapid re-housing are those currently homeless persons for whom a potential living unit has been identified and will be available in less than a month. Participants within the Brookline-Newton-Waltham-Watertown region will be prioritized for homelessness prevention and rapid re-housing assistance.

The case manager assigned to the program participant is responsible for determining the type of assistance necessary, amount, and duration of housing stabilization or relocation services to provide a program participant. In addition, the case manager is responsible to determine the type of service that is most appropriate for the program participant and the amount of financial assistance required. Financial assistance cannot be provided to persons who are already receiving the same type of assistance through other public sources. For instance, rental assistance cannot be provided to a person who is receiving tenant-based rental assistance or living in a housing unit receiving project-based rental assistance.

All housing must be determined to meet HUD's minimum standards and requirements for habitability, sanitation, lead-based paint, and rent reasonableness.

Part of the financial evaluation of each participant is a calculation of net assets. Other than the value of an automobile and the worth of retirement savings accounts, if the participant has a net worth exceeding a threshold of \$15,000, the participant would need to pay 100% of rent, utilities, and other costs until his/her net worth drops below the threshold amount.

According to HUD policy, rental assistance cannot be provided if the rent exceeds the Fair Market Rent established by HUD, as provided under 24 CFR part 888, and must comply with HUD's standard of rent reasonableness, as established under 24 CFR 982.507. The [FY2021 HUD Boston-Cambridge-Quincy Metro Fair Market Rents](#) were revised and will become effective as of April 1, 2021. The revised Fair Market Rents are listed below. Once HUD releases the FY2022 Fair Market Rents, City staff will send the information along to ESG agencies.

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**Final FY 2022 FMRs By Unit Bedrooms**

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	<u>Efficiency</u>	<u>One- Bedroom</u>	<u>Two- Bedroom</u>	<u>Three- Bedroom</u>	<u>Four- Bedroom</u>
<b>Final FY 2022 FMR</b>	\$1,658	\$1,826	\$2,205	\$2,726	\$2,990

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Eligible financial assistance may include housing search, rent application, security deposit, utility deposits, moving costs, and first and last month's rent and utility payments. A one-time payment of rental arrearage may be made for a period of up to six months. The provider may make rental assistance payments only to an owner with whom the provider has entered into a rental assistance agreement. The agreement must require that the owner provide a copy of any eviction action or any notice to the program participant to vacate the rental unit.

## **VI. Determining the Share of Rent and Utilities Costs that Each Program Participant Must Pay, if any, While Receiving Homelessness Prevention or Rapid Re-Housing Assistance**

It is expected that negotiations will be held with all relevant parties at the outset to determine:

- a) The type of financial assistance required, agreement of amounts, and method of payment;
- b) The proportion of financial participation by the program participant; and
- c) Other specific commitments of the program participant (e.g. to work toward self-sufficiency).

Determinations of the share of rent and utility costs to be paid on behalf of a program participant must be made on a case-by-case basis. Program participants are expected to contribute as great a share of the cost of rent and utilities as is affordable to them. In addition, they are required to seek alternative sources of financial assistance.

Financial assistance allocations are to be determined on a month-to-month basis for the first three-month period. After three months, a complete re-evaluation of the program participant who has received homelessness prevention services must be conducted by the case manager to determine the program participant's eligibility for services and to determine the participant's ability to increase her/his share of rental payments. A similar re-evaluation must be conducted every three months thereafter, if the program participant receives financial assistance. If the service is rapid re-housing, a re-evaluation of program participant status (re: eligibility) is required no more than annually from the initial evaluation. At any point during the provision of financial assistance, the program participant exceeds 30% of the AMI, as determined by HUD, or if the program participant has other resources or support networks that would allow him/her to retain housing without ESG assistance, the program participant must be declared ineligible for further assistance.

Other than the possible exception of payment of first month's rent and the required security deposit, program participants are required to pay some portion of rent, minimally 30% of the program participant's income. Income will be calculated by totaling gross wages on pay stubs received by the participant after applying to the program. The participants' share of rental payments ideally should increase incrementally throughout the period of assistance. Hardship waivers to reduce or forgo contributions can be granted in extreme circumstances at the discretion of the case manager and/or agency. Requests for waivers must be reviewed and approved by a supervisor, with the appropriate documentation kept on file.

## **VII. Standards for Determining How Long a Particular Program Participant will be provided with Financial Assistance and Whether and How the Amount of that Assistance will be Adjusted Over Time**

Rental assistance is to be provided for the least amount of time possible and will only be provided so long as the case manager determines it to be absolutely necessary in helping participant(s) regain stability in permanent housing. Normally, the maximum period of rental assistance will be nine (9) months. Only in cases of extreme need will rental assistance will be provided for a full year. Regardless of the length of the period of subsidy, all program participants who are receiving rental assistance must have a legally binding, written lease for the rental unit that is between the owner and the program participant. A lease is not required in the case of a rental arrearage payment.

In general, assistance with utility payments is limited to emergencies, such as if it is necessary for a program participant to move into a new unit or if the utility arrearages are so great that a negotiated settlement must be made with the utility companies to avoid shut-off. Program participants must work with the case manager to negotiate a payment plan for utilities arrearages.

Meetings with the program participant, landlord or prospective landlord, and the case manager are to be held, as needed, to assure that the program participant or program participant household achieves stability in housing.

Due to the anticipated large number of eligible individuals and families seeking housing stabilization or relocation services, program participants may only receive benefits for one period of time, as determined by the case manager.

## VIII. Habitability, Sanitation, Safety and Lead-Based Paint Standards

All ESG subrecipients and service providers must adhere to federally required standards to ensure that shelter and housing facilities are safe, sanitary, accessible, and adequately maintained for program participants.

In accordance with 24 CFR 576.403, all units in which program participants are receiving emergency shelter or housing assistance must meet HUD Habitability and Lead-Based Paint Standards. **Subrecipients are required to complete the ESG Minimum Habitability Standards Checklist and Lead Screening Worksheet (please see Attachments 3 and 4).** The only exception to this requirement is in cases where **only** security deposits assistance and/or rental arrearage assistance is being provided.

Assisted units must meet federal lead paint requirements if the unit was constructed before 1978 and if a child under six years old and/or a pregnant woman is or will be residing in the unit. Subrecipients must document these inspections using the Habitability Checklist. The habitability and visual lead inspection must be completed by a certified inspector. A certified inspector is one who has successfully completed [HUD's Visual Assessment Training](#). The inspection must ensure the unit complies with ALL standards on the checklist, otherwise the unit will not be eligible to grant assistance.

The inspection must include, at a minimum:

- Verification of age of structure;
- Visual assessment and confirmation that paint surfaces are not chipping, cracking, or peeling using the Habitability Checklist; and
- Verification that the unit has been de-leaded or paint encapsulated from a Massachusetts-approved de-leading vendor.

If a HUD-approved inspection for Section 8 has been recently completed for the unit, a copy of that inspection report in the client's file is sufficient because the regulations governing Section 8 inspections are more stringent than those governing ESG inspections. A lead-free certification for a unit can also be used to satisfy the lead paint requirement.

Additional information about HUD's Visual Assessment Training can be found at:

<https://apps.hud.gov/offices/lead/training/visualassessment/h00101.htm>.

Shelters must be accessible and should have a second means of exiting the facility in the event of an emergency. Every assisted facility must establish appropriate safeguards in order to meet the safety and shelter needs of special populations and enact the proper security precautions to those in its care. In addition, each shelter and housing unit must be maintained in sanitary condition with each program participant having access to sanitary facilities that are clean and in proper operating condition.

## **IX. Fair Housing and Affirmative Outreach**

Subrecipients and service providers must communicate and make known that the use of ESG-funded facilities, assistance, and services are available to all on a nondiscriminatory basis. Subrecipients are required to develop and implement affirmative outreach procedures and communication tools and materials in conformance with all federal, state, and local fair housing statutes to inform persons without regard race, color, sex, age, disability, religious creed, familial status, national origin or ancestry, genetic information, marital status, veteran or military status, sexual orientation, gender identity or expression or status as a recipient of public and/or rental assistance and how to obtain access to facilities and services. Additional outreach measures must be taken to ensure that program outreach will reach those who would not traditionally access such opportunities.

In addition, reasonable accommodations for persons with disabilities must be available in order to ensure disabled participants have an equal opportunity to utilize housing, including shelters, and receive essential services. Greater levels of accessibility may be required for some shelters in compliance with The Americans with Disabilities Act.

## **X. Matching Funds**

Subrecipients must match 100% of awarded ESG funds from non-ESG sources. The matching requirement may be met with cash contributions and/or non-cash contributions, including the value of any real property, lease, equipment, goods, or services contributed to the organizations applying for ESG funds. Non-cash contributions may also include the purchase value of any donated building. Matching funds may also include salary paid to staff (not included in the ESG award) and time contributed by volunteers to carry out the project.

If matching contributions include funds from the Continuum of Care Program or another federal program, the applicant must ensure that all laws governing those federal funds are followed and that matching requirements do not prohibit those use of those funds for match.



## **XI. Termination of Assistance**

As outlined in 24 CFR 576.402, the subrecipient may terminate assistance if the program participant has violated program requirements in accordance with a formal process established by the subrecipient. Termination of services may occur in situations where the participant violates program standards, misrepresents eligibility status, violates the lease agreement, and/or engages in criminal activity. The subrecipient must exercise judgment, examine, and document all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases. The termination must be preceded by a due process recognizing the rights of individuals affected, to include, at a minimum:

- Written notification and clear statement of reasons for termination from the program;
- Opportunity to appeal to a third party; and
- Prompt appeal response.

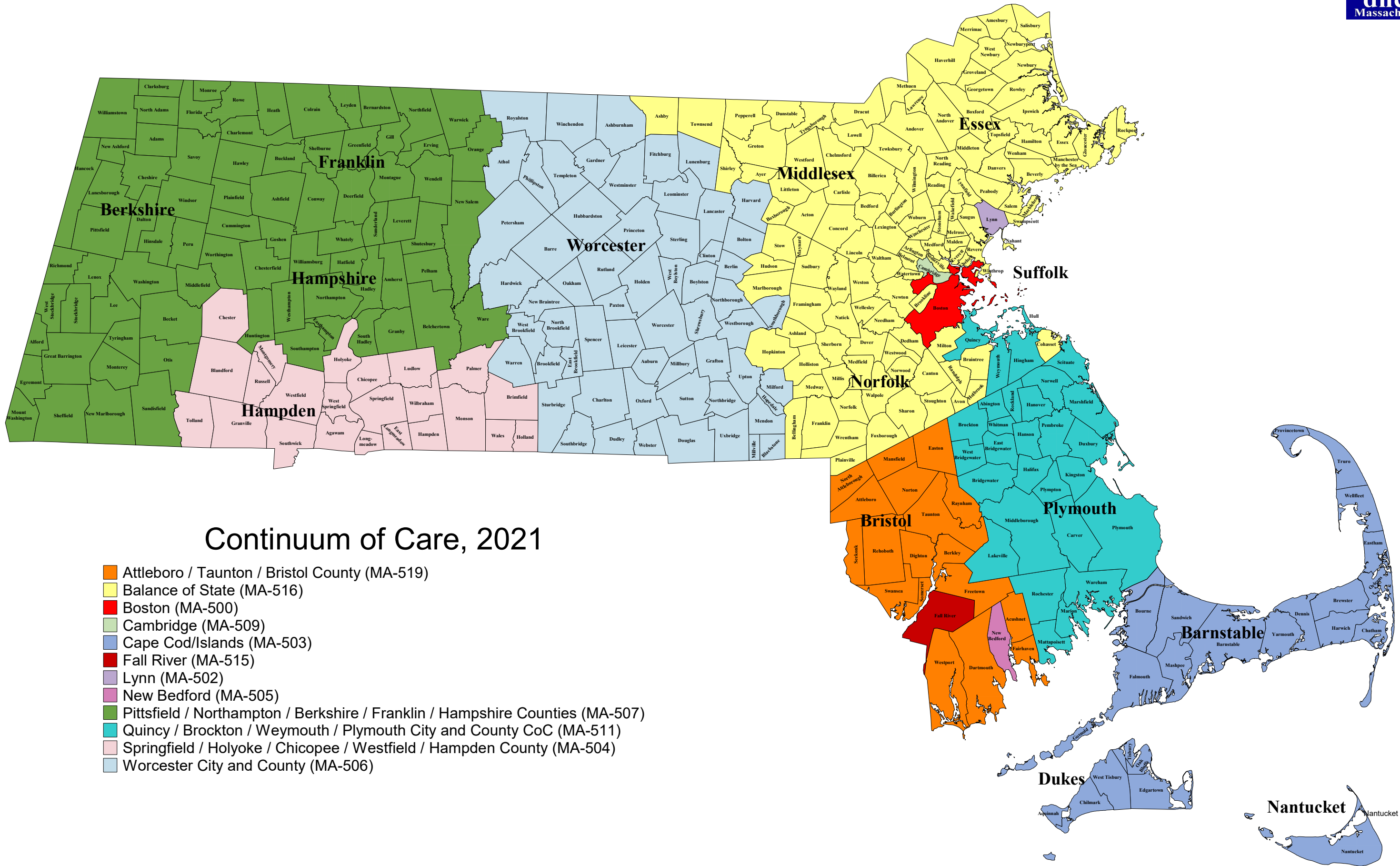
Participants who are terminated cannot re-apply for services until all outstanding issues are cleared to the satisfaction of the City of Newton.

## **XII. CARES Act**

The Coronavirus Act, Relief, and Economic Security Act, also known as the CARES Act, is a \$2.2 trillion economic stimulus bill which was signed into law on March 27, 2020. The bill was in response to the economic fallout of the coronavirus (COVID-19) pandemic in the United States. As a result, the City of Newton received Emergency Solutions Grant Coronavirus (ESG-CV) funds to prepare, prevent for, and respond to COVID-19 among individuals and families who are homeless or receiving homeless assistance and to support additional homeless assistance and homelessness prevention activities to mitigate the impacts created by coronavirus. Requirements at 24 CFR Part 576 will apply to the use of these funds, unless otherwise provided by the alternative requirements and flexibilities established under the CARES Act, Notice CPD 20-08, or subsequent waivers, amendments, or replacements to the Notice. HUD's Notice CPD 20-08 became effective on September 1, 2020 and can be viewed on: <https://www.hud.gov/sites/dfiles/OCHCO/documents/20-08cpdn.pdf>.

## **Forms and Attachments**

1. Criteria for Defining Homelessness
2. Criteria for Defining At-Risk of Homelessness
3. ESG Minimum Habitability Standards Checklists
4. ESG Lead Screening Worksheet
5. ESG Program Components Quick Reference
6. ESG Applicable Requirements for Rental Assistance and Housing Relocation and Stabilization Services Matrix
7. Balance of State CoC Coordinated Entry Forms



## Continuum of Care, 2021

- Attleboro / Taunton / Bristol County (MA-519)
- Balance of State (MA-516)
- Boston (MA-500)
- Cambridge (MA-509)
- Cape Cod/Islands (MA-503)
- Fall River (MA-515)
- Lynn (MA-502)
- New Bedford (MA-505)
- Pittsfield / Northampton / Berkshire / Franklin / Hampshire Counties (MA-507)
- Quincy / Brockton / Weymouth / Plymouth City and County CoC (MA-511)
- Springfield / Holyoke / Chicopee / Westfield / Hampden County (MA-504)
- Worcester City and County (MA-506)

**Newton Community Development Block Grant Program - FY23 Budget**

PROJECT #	IDIS #	Env. Review	Key Org	Obj Code	Projects	Letter-of-Credit (LOC) Budget	FY23 Program Income (Estimated)	Prior Year(s) Program Income (FY22)	Total Budget
<b>HOUSING PROGRAM</b>									
CD23-01A	3828	Exempt	15002022	Various	Housing Program Delivery	\$278,875.00			\$278,875.00
CD23-01B	3829	project by project	15002022	579600	Housing Rehabilitation and Development Program Fund	\$850,497.00			\$850,497.00
CD23-01C	3830	project by project	15002022	579601	Housing Program Income Pool (estimated rehab loan repayments)		\$35,750.00		\$35,750.00
<b>HOUSING PROGRAM TOTAL</b>						<b>\$1,129,372.00</b>	<b>\$35,750.00</b>	<b>\$0.00</b>	<b>\$1,165,122.00</b>
<b>ARCHITECTURAL ACCESS</b>									
CD23-03A	3831	project by project	15002022	586001	Accessible Crossings	\$90,500.00			\$90,500.00
<b>ARCHITECTURAL ACCESS TOTAL</b>						<b>\$90,500.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$90,500.00</b>
<b>HUMAN SERVICES</b>									
CD23-05A	3832	Exempt	15002022	579700	The Carroll Center for the Blind / Career and Vocational Rehab Services	\$14,300.00			\$14,300.00
CD23-05B	3833	Exempt	15002022	579700	Boys & Girls Club of Newton / Financial Aid for Teens and Families	\$16,200.00			\$16,200.00
CD23-05C	3834	Exempt	15002022	579700	West Suburban YMCA / Childcare Financial Aid Program	\$38,100.00			\$38,100.00
CD23-05D	3835	Exempt	15002022	579700	Family ACCESS of Newton / Sustaining access to childcare for low-income families	\$33,300.00			\$33,300.00
CD23-05E	3836	Exempt	15002022	579700	Jewish Big Brothers & Big Sisters / Mentoring Initiatives	\$9,500.00			\$9,500.00
CD23-05F	3837	Exempt	15002022	579700	2Life Communities / Caring Choices and Wellness Nursing for Low-Income Seniors	\$19,000.00			\$19,000.00
CD23-05G	3838	Exempt	15002022	579700	Jewish Family & Children's Service/ Stabilization & Recovery Services	\$9,744.00		\$4,556	\$14,300.00
CD23-05H	3839	Exempt	15002022	579700	Newton Community Development Foundation / Resident Services Program	\$23,800.00			\$23,800.00
CD23-05I	3840	Exempt	15002022	579700	Newton Housing Authority / Resident Services Program	\$38,100.00			\$38,100.00
CD23-05J	3841	Exempt	15002022	579700	Plowshares Education Development Center / Tuition Assistance for Childcare	\$9,600.00			\$9,600.00
CD23-05K	3842	Exempt	15002022	579700	Pathway to Possible / Clinical Social Worker	\$9,600.00			\$9,600.00
CD23-05L	3843	Exempt	15002022	579700	Riverside Community Care / Riverside Outpatient Behavioral Health and Substance Use Services	\$19,100.00			\$19,100.00
CD23-05M	3844	Exempt	15002022	579700	The Second Step /Community Programs for Survivors of Domestic Violence	\$23,800.00			\$23,800.00
CD23-05N	3845	Exempt	15002022	579700	Dept. of Parks & Rec. / Financial Aid for Youth Summer Camp	\$12,300.00			\$12,300.00
CD23-98D	3846	Exempt	15002022	579700	Human Service Program Income Reserve**** (for FY24 projects- do not include in FY23 budget totals)		\$8,250		
<b>HUMAN SERVICES TOTAL</b> <i>(Cannot exceed 15% of current year LOC + 15% of prior year program income)</i>						<b>\$276,444.00</b>	<b>\$8,250.00</b>	<b>\$4,556.00</b>	<b>\$281,000.00</b>
<b>PROGRAM ADMINISTRATION</b>									
CD23-09A	3847	Exempt	15002022	Various	Program Administration	\$373,079.00	\$11,000.00		\$384,079.00
CD23-09B	3848	Exempt	15002022	Various	Citizen Participation	\$1,000.00			\$1,000.00
CD23-99	3849	Exempt	15002022	579700	Contingencies				\$0.00
<b>PROGM ADMIN TOTAL</b> <i>(Cannot exceed 20% of current year LOC + 20% of current year program income- must also include Planning activities)</i>						<b>\$374,079.00</b>	<b>\$11,000.00</b>	<b>\$0.00</b>	<b>\$385,079.00</b>
<b>GRAND TOTAL ALL PROGRAM AREAS</b>						<b>\$1,870,395.00</b>	<b>\$55,000.00</b>	<b>\$4,556.00</b>	<b>\$1,921,701.00</b>
<b>FY23 CDBG Letter of Credit Funds from HUD B-22-MC-25-0019</b>						<b>\$1,870,395.00</b>			

**Newton Emergency Solutions Grants Program - FY23 Budget**

<b>Project Number</b>	<b>Env. Review</b>	<b>IDIS #</b>	<b>ESG PROJECTS</b>	<b>KEY ORG</b>	<b>OBJ CODE</b>	<b>ACCOUNT TITLE</b>	<b>ESG Funds</b>
ES23-01A	Exempt		Individual Shelter Assistance -- Middlesex Human Service Agency	21012023	579700	Grants	\$ 8,050.00
ES23-01B	Exempt		Residential Shelter Program --The Second Step	21012023	579700	Grants	\$ 30,195.00
ES23-01C	Exempt		Integrated Day and Seasonal Night Programs -- Community Day Center of Waltham	21012023	579700	Grants	\$ 38,650.00
ES23-01D	Exempt		Shelter Operations -- REACH	21012023	579700	Grants	\$ 22,140.00
ES23-02A	Exempt		Homelessness Prevention -- Brookline Community Mental Health Center	21012023	579700	Grants	\$ 27,235.00
ES23-03A	Exempt		Rapid Re-housing -- Brookline Community Mental Health Center	21012023	579700	Grants	\$ 26,410.00
ES23-05A	Exempt		ESG Administration	21012023	579700	Grants	\$ 12,379.00
							<b>\$ 165,059.00</b>
<b>FY23 ESG Letter of Credit Funds E-22-MC-25-0019</b>							

## WestMetro HOME Partnerships Program FY23 Projects

Project #	PROJECT NAME/TYPE	FY23 Budget	Prior Yr(s) Program Income	Uncommitted Prior Yr(s) Entitlement Funds	Anticipated FY23 Program Income	Totals
<b>BEDFORD</b>						
HM23-01A/HM22-01A	Bedford HOME Administration	\$ 1,700.00				\$ 1,700.00
HM23-01B/HM22-01B/HM21-01B/HM20-01B	Bedford TBRA	\$ 17,040.00		\$ 16,754.27		\$ 33,794.27
TOTAL		<b>\$ 18,740.00</b>	<b>\$ -</b>	<b>\$ 16,754.27</b>	<b>\$ -</b>	<b>\$ 35,494.27</b>
<b>BELMONT</b>						
HM23-02A/HM21-02A	Belmont HOME Administration	\$ 5,320.00		\$ 5,075.00		\$ 10,395.00
HM23-02B/HM22-02B	Belmont Projects / Programs	\$ 53,185.00		\$ 48,975.00		\$ 102,160.00
HM21-02B	Bradford Estates			\$ 50,775.00		\$ 50,775.00
TOTAL		<b>\$ 58,505.00</b>	<b>\$ -</b>	<b>\$ 104,825.00</b>	<b>\$ -</b>	<b>\$ 163,330.00</b>
<b>BROOKLINE</b>						
HM23-03A	Brookline HOME Administration	\$ 22,990.00				\$ 22,990.00
HM23-03C	Hebrew SeniorLife 108 Centre Street	\$ 229,875.00	\$ 213,349.94	\$ 206,175.00		\$ 649,399.94
HM22-03B	Housing Development - BHA Strategic Preservation Initiative			\$ 211,900.00		\$ 211,900.00
HM23-03P	Brookline Program Income - 108 Centre St				\$ 50,000.00	\$ 50,000.00
TOTAL		<b>\$ 252,865.00</b>	<b>\$ 213,349.94</b>	<b>\$ 418,075.00</b>	<b>\$ 50,000.00</b>	<b>\$ 934,289.94</b>
<b>CONCORD</b>						
HM23-13A/HM22-13A	Concord HOME Administration	\$ 3,040.00		\$ 2,800.00		\$ 5,840.00
HM23-13B/HM21-13B/HM20-13B/HM19-	Housing Development - Christopher Heights of	\$ 30,385.00		\$ 627,743.40		\$ 658,128.40
TOTAL		<b>\$ 33,425.00</b>	<b>\$ -</b>	<b>\$ 630,543.40</b>	<b>\$ -</b>	<b>\$ 663,968.40</b>
<b>FRAMINGHAM</b>						
HM23-09A	Framingham HOME Administration	\$ 25,315.00				\$ 25,315.00
HM23-09E/HM19-09E	Carlson Crossing	\$ 110,000.00		\$ 332,118.74		\$ 442,118.74
HM23-09C/HM22-09C	Framingham TBRA Program	\$ 143,140.00	\$ 23,133.41	\$ 124,412.10		\$ 290,685.51
HM23-09P	Framingham Program Income- reserved for TBRA				\$ 9,000.00	\$ 9,000.00
TOTAL		<b>\$ 278,455.00</b>	<b>\$ 23,133.41</b>	<b>\$ 456,530.84</b>	<b>\$ 9,000.00</b>	<b>\$ 767,119.25</b>
<b>LEXINGTON</b>						
HM23-12A/HM22-12A	Lexington HOME Administration	\$ 3,215.00		\$ 2,975.00		\$ 6,190.00
HM23-12B/HM22-12B/HM21-12B	Lexington Projects / Programs	\$ 32,170.00		\$ 29,650.00		\$ 61,820.00
TOTAL		<b>\$ 35,385.00</b>	<b>\$ -</b>	<b>\$ 32,625.00</b>	<b>\$ -</b>	<b>\$ 68,010.00</b>
<b>NATICK</b>						
HM23-11A/HM22-11A	Natick HOME Administration	\$ 4,780.00		\$ 4,400.00		\$ 9,180.00
HM23-11B/HM22-11B/HM21-11B/HM20-1	Natick TBRA Program	\$ 47,805.00	\$ 10,000.00	\$ 126,399.00		\$ 184,204.00
TOTAL		<b>\$ 52,585.00</b>	<b>\$ 10,000.00</b>	<b>\$ 130,799.00</b>	<b>\$ -</b>	<b>\$ 193,384.00</b>
<b>NEEDHAM</b>						
HM23-05A	Needham HOME Administration	\$ 3,010.00				\$ 3,010.00
HM23-05B/HM22-05B/HM21-05B	Needham Projects / Programs	\$ 30,090.00		\$ 27,775.00		\$ 57,865.00
TOTAL		<b>\$ 33,100.00</b>	<b>\$ -</b>	<b>\$ 27,775.00</b>	<b>\$ -</b>	<b>\$ 60,875.00</b>
<b>NEWTON</b>						
HM23-06A	Newton HOME Administration	\$ 12,928.66				\$ 12,928.66
HM23-06B	Newton Projects/Programs	\$ 129,286.60				\$ 129,286.60
TOTAL		<b>\$ 142,215.26</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 142,215.26</b>
<b>SUDBURY</b>						
HM23-10A/HM22-10A	Sudbury HOME Administration	\$ 810.00		\$ 750.00		\$ 1,560.00
HM23-10B/HM22-10B	Sudbury Projects / Programs	\$ 8,110.00		\$ 511.00		\$ 8,621.00
TOTAL		<b>\$ 8,920.00</b>	<b>\$ -</b>	<b>\$ 1,261.00</b>	<b>\$ -</b>	<b>\$ 10,181.00</b>
<b>WALTHAM</b>						
HM23-07A/HM22-07A	Waltham HOME Administration	\$ 19,230.00		\$ 17,725.00		\$ 36,955.00
HM23-07B/HM22-07B/HM21-07B	Waltham TBRA Program	\$ 192,310.00		\$ 202,143.04		\$ 394,453.04
HM22-07P/HM21-07C/HM21-07P	Waltham Program Income- Beaverbrook Apts- 280-324 Grove Street		\$ 319,578.00	\$ 80,422.00		\$ 400,000.00
HM23-7P	Waltham Program Income - reserved for TBRA				\$ 90,000.00	\$ 90,000.00
TOTAL		<b>\$ 211,540.00</b>	<b>\$ 319,578.00</b>	<b>\$ 300,290.04</b>	<b>\$ 90,000.00</b>	<b>\$ 921,408.04</b>
<b>WATERTOWN</b>						
HM23-08A/HM22-08A	Watertown HOME Administration	\$ 10,025.00				\$ 10,025.00
HM23-08B/HM22-08B/HM21-08B	Watertown Projects / Programs	\$ 100,250.00		\$ 92,425.00		\$ 192,675.00
HM23-08C/HM19-08B	St. Joseph's Hall		\$ 145,897.85			\$ 145,897.85
HM22-08P	Watertown Program Income		\$ 119,155.50		\$ -	\$ 119,155.50
TOTAL		<b>\$ 110,275.00</b>	<b>\$ 265,053.35</b>	<b>\$ 92,425.00</b>	<b>\$ -</b>	<b>\$ 467,753.35</b>
<b>WAYLAND</b>						
HM23-14A	Wayland HOME Administration	\$ 920.00				\$ 920.00
HM23-14B/HM22-14B/HM21-14B/HM20-1	Wayland TBRA Program	\$ 9,190.00		\$ 5,450.00		\$ 14,640.00
TOTAL		<b>\$ 10,110.00</b>	<b>\$ -</b>	<b>\$ 5,450.00</b>	<b>\$ -</b>	<b>\$ 15,560.00</b>
<b>CONSORTIUM ADMINISTRATION</b>						
HM23-99	Consortium HOME Administration	\$ 48,550.14			\$ 1,000.00	\$ 49,550.14
HM23-15A	Competitive Funding Pool	\$ -				\$ -
HM23-15B	CHDO Operating Expenses Funding Pool	\$ 80,916.90				\$ 80,916.90
HM22-15B1	Metro West Collaborative CHDO Operating Funds			\$ 50,000.00		\$ 50,000.00
HM23-15C/HM22-15C	CHDO Set Aside Funding Pool	\$ 242,750.70		\$ 223,779.75		\$ 466,530.45
TOTAL		<b>\$ 372,217.74</b>	<b>\$ -</b>	<b>\$ 273,779.75</b>	<b>\$ 1,000.00</b>	<b>\$ 646,997.49</b>

**TOTAL FY23 HOME CONSORTIUM BUDGET** \$ 1,618,338.00    \$ 831,114.70    \$ 2,491,133.30    \$ 150,000.00    \$ 5,090,586.00  
**HOME Consortium Letter of Credit Funds M22-DC25-0213** \$ 1,618,338.00

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text"/>	4. Applicant Identifier: <input type="text" value="B-22-MC-25-0019"/>	
5a. Federal Entity Identifier: <input type="text" value="UPG Code: MA251650"/>	5b. Federal Award Identifier: <input type="text" value="B-22-MC-25-0019"/>	
<b>State Use Only:</b>		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
<b>8. APPLICANT INFORMATION:</b>		
* a. Legal Name: <input type="text" value="City of Newton"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="04-6001404"/>	* c. UEI: <input type="text" value="UE9YQW2H1ZA3"/>	
<b>d. Address:</b>		
* Street1: <input type="text" value="1000 Commonwealth Avenue"/>	Street2: <input type="text"/>	
* City: <input type="text" value="Newton"/>	County/Parish: <input type="text"/>	
* State: <input type="text" value="MA: Massachusetts"/>	Province: <input type="text"/>	
* Country: <input type="text" value="USA: UNITED STATES"/>	* Zip / Postal Code: <input type="text" value="02459-1149"/>	
<b>e. Organizational Unit:</b>		
Department Name: <input type="text" value="Planning and Development"/>	Division Name: <input type="text" value="Housing/Community Development"/>	
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
Prefix: <input type="text" value="Mrs."/>	* First Name: <input type="text" value="Amanda"/>	
Middle Name: <input type="text"/>	* Last Name: <input type="text" value="Berman"/>	
Suffix: <input type="text"/>	Title: <input type="text" value="Director of Housing and Community Development"/>	
Organizational Affiliation: <input type="text" value="City of Newton"/>		
* Telephone Number: <input type="text" value="617-796-1147"/>	Fax Number: <input type="text"/>	
* Email: <input type="text" value="aberman@newtonma.gov"/>		

**Application for Federal Assistance SF-424**

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

X: Other (specify)

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

WestMetro HOME Cons; BoS CoC

**\* 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

14.218

CFDA Title:

CDBG/Entitlement Grant Program

**\* 12. Funding Opportunity Number:**

B-22-MC-25-0019

\* Title:

City of Newton CDBG Program

**13. Competition Identification Number:**

Title:

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

Form SF 424 Attachment - Question 14.pdf

Add Attachment

Delete Attachment

View Attachment

**\* 15. Descriptive Title of Applicant's Project:**

City of Newton CDBG Program

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="1,870,395.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text" value="55,000.00"/>
* g. TOTAL	<input type="text" value="1,925,395.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes  No

If "Yes", provide explanation and attach

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.


**Authorized Representative:**

Prefix:  \* First Name:   
Middle Name:   
\* Last Name:   
Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative: 

\* Date Signed:



Form SF 424  
City of Newton

**14. Areas Affected by Project – Attachment**

CDBG Program: City of Newton

WestMetro HOME Consortium: Bedford, Belmont, Brookline, Concord, Framingham, Lexington, Natick, Needham, Newton, Sudbury, Waltham, Watertown, and Wayland

Continuum of Care and/or ESG: Brookline, Newton, Waltham, Watertown

Form SF 424  
City of Newton

**16. Congressional Districts of Program/Project – Attachment**  
MA-003; MA-004; MA-005; MA-006

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text"/>	4. Applicant Identifier: <input type="text" value="E22-MC-25-0010"/>	
5a. Federal Entity Identifier: <input type="text" value="UPG Code: MA251650"/>	5b. Federal Award Identifier: <input type="text" value="E22-MC-25-0010"/>	
<b>State Use Only:</b>		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
<b>8. APPLICANT INFORMATION:</b>		
* a. Legal Name: <input type="text" value="City of Newton"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="04-6001404"/>	* c. UEI: <input type="text" value="UE9YQW2H1ZA3"/>	
<b>d. Address:</b>		
* Street1: <input type="text" value="1000 Commonwealth Avenue"/>	Street2: <input type="text"/>	
* City: <input type="text" value="Newton"/>	County/Parish: <input type="text"/>	
* State: <input type="text" value="MA: Massachusetts"/>	Province: <input type="text"/>	
* Country: <input type="text" value="USA: UNITED STATES"/>	* Zip / Postal Code: <input type="text" value="02459-1149"/>	
<b>e. Organizational Unit:</b>		
Department Name: <input type="text" value="Planning and Development"/>	Division Name: <input type="text" value="Housing/Community Development"/>	
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
Prefix: <input type="text" value="Mrs."/>	* First Name: <input type="text" value="Amanda"/>	
Middle Name: <input type="text"/>	* Last Name: <input type="text" value="Berman"/>	
Suffix: <input type="text"/>	Title: <input type="text" value="Director of Housing and Community Development"/>	
Organizational Affiliation: <input type="text" value="City of Newton"/>		
* Telephone Number: <input type="text" value="617-796-1147"/>	Fax Number: <input type="text"/>	
* Email: <input type="text" value="aberman@newtonma.gov"/>		

**Application for Federal Assistance SF-424**

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

X: Other (specify)

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

WestMetro HOME Cons; BoS CoC

**\* 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

14.231

CFDA Title:

City of Newton ESG Program

**\* 12. Funding Opportunity Number:**

E22-MC25-0010

\* Title:

City of Newton ESG Program

**13. Competition Identification Number:**

Title:

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

Form SF 424 Attachment - Question 14.pdf

Add Attachment

Delete Attachment

View Attachment

**\* 15. Descriptive Title of Applicant's Project:**

City of Newton ESG Program

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

\* a. Applicant MA-004

\* b. Program/Project MA-004

Attach an additional list of Program/Project Congressional Districts if needed.

Form SF 424 Attachment - Question 16.pdf Add Attachment Delete Attachment View Attachment

17. Proposed Project:

\* a. Start Date: 07/01/2022

\* b. End Date: 06/30/2023

18. Estimated Funding (\$):

Table with 2 columns: Category and Amount. Rows include Federal (165,059.00), Applicant, State, Local, Other, Program Income, and TOTAL (165,059.00).

\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

- Radio button options: a. This application was made available to the State under the Executive Order 12372 Process for review on [ ] b. Program is subject to E.O. 12372 but has not been selected by the State for review. c. Program is not covered by E.O. 12372. [X]

\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

- Radio button options: Yes [ ] No [X]

If "Yes", provide explanation and attach

[ ] Add Attachment Delete Attachment View Attachment

21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

[X] \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: [ ] \* First Name: Ruthanne Middle Name: [ ] \* Last Name: Fuller Suffix: [ ]

\* Title: Mayor

\* Telephone Number: 617-796-1000 Fax Number: [ ]

\* Email: rfuller@newtonma.gov

\* Signature of Authorized Representative: Ruthanne Fuller

\* Date Signed: 6/9/22

Form SF 424  
City of Newton

**14. Areas Affected by Project – Attachment**

CDBG Program: City of Newton

WestMetro HOME Consortium: Bedford, Belmont, Brookline, Concord, Framingham, Lexington, Natick, Needham, Newton, Sudbury, Waltham, Watertown, and Wayland

Continuum of Care and/or ESG: Brookline, Newton, Waltham, Watertown

Form SF 424  
City of Newton

**16. Congressional Districts of Program/Project – Attachment**  
MA-003; MA-004; MA-005; MA-006

Application for Federal Assistance SF-424	
<b>* 1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	
<b>* 2. Type of Application:</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	
<b>* If Revision, select appropriate letter(s):</b> _____ <b>* Other (Specify):</b> _____	
<b>* 3. Date Received:</b> _____	<b>4. Applicant Identifier:</b> M22-DC25-0213
<b>5a. Federal Entity Identifier:</b> UPG Code: MA251650	<b>5b. Federal Award Identifier:</b> M22-DC25-0213
<b>State Use Only:</b>	
<b>6. Date Received by State:</b> _____	<b>7. State Application Identifier:</b> _____
<b>8. APPLICANT INFORMATION:</b>	
<b>* a. Legal Name:</b> City of Newton	
<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b> 04-6001404	<b>* c. UEI:</b> UE9YQW2H1ZA3
<b>d. Address:</b>	
<b>* Street1:</b> 1000 Commonwealth Avenue	_____
<b>Street2:</b>	_____
<b>* City:</b> Newton	_____
<b>County/Parish:</b>	_____
<b>* State:</b> MA: Massachusetts	_____
<b>Province:</b>	_____
<b>* Country:</b> USA: UNITED STATES	_____
<b>* Zip / Postal Code:</b> 02459-1149	_____
<b>e. Organizational Unit:</b>	
<b>Department Name:</b> Planning and Development	<b>Division Name:</b> Housing/Community Development
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>	
<b>Prefix:</b> Mrs.	<b>* First Name:</b> Amanda
<b>Middle Name:</b>	_____
<b>* Last Name:</b> Berman	_____
<b>Suffix:</b>	_____
<b>Title:</b> Director of Housing and Community Development	
<b>Organizational Affiliation:</b> City of Newton	
<b>* Telephone Number:</b> 617-796-1147	<b>Fax Number:</b> _____
<b>* Email:</b> aberman@newtonma.gov	



**Application for Federal Assistance SF-424**

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

X: Other (specify)

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

WestMetro HOME Cons; BoS CoC

**\* 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

14.239

CFDA Title:

HOME Investment Partnerships Program

**\* 12. Funding Opportunity Number:**

MA22-DC25-0213

\* Title:

HOME Investment Partnerships Program

**13. Competition Identification Number:**

Title:

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

Form SF 424 Attachment - Question 14.pdf

**\* 15. Descriptive Title of Applicant's Project:**

WestMetro HOME Consortium Program

Attach supporting documents as specified in agency instructions.

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="1,618,338.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program income	<input type="text" value="150,000.00"/>
* g. TOTAL	<input type="text" value="1,768,338.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

- Yes
- No

If "Yes", provide explanation and attach

21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

\*\* I AGREE

\*\* The list of certifications and assurances, or an Internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

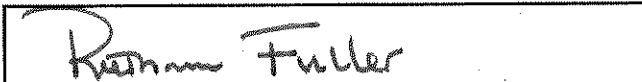
**Authorized Representative:**

Prefix:  \* First Name:   
Middle Name:   
\* Last Name:   
Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative: 

\* Date Signed:

Form SF 424  
City of Newton

**14. Areas Affected by Project – Attachment**

CDBG Program: City of Newton

WestMetro HOME Consortium: Bedford, Belmont, Brookline, Concord, Framingham, Lexington, Natick, Needham, Newton, Sudbury, Waltham, Watertown, and Wayland

Continuum of Care and/or ESG: Brookline, Newton, Waltham, Watertown

Form SF 424  
City of Newton

**16. Congressional Districts of Program/Project – Attachment**  
MA-003; MA-004; MA-005; MA-006

### ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.


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

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

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

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor
APPLICANT ORGANIZATION City of Newton; Community Development Block Grant Program	DATE SUBMITTED 6/9/22

Standard Form 424B (Rev. 7-97) Back

### ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.


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

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

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

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor
APPLICANT ORGANIZATION City of Newton; ESG program	DATE SUBMITTED 6/9/22

Standard Form 424B (Rev. 7-97) Back



### ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.


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

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
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18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor
APPLICANT ORGANIZATION City of Newton; HOME Investment Partnerships Program	DATE SUBMITTED 6/9/22

Standard Form 424B (Rev. 7-97) Back

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2022

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2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
<div style="border: 1px solid black; padding: 5px; min-height: 40px;">  </div>	<div style="border: 1px solid black; padding: 5px; min-height: 20px;">Mayor</div>
APPLICANT ORGANIZATION	DATE SUBMITTED
<div style="border: 1px solid black; padding: 5px; min-height: 20px;">City of Newton, Community Development Block Grant Program</div>	<div style="border: 1px solid black; padding: 5px; min-height: 20px;">6/9/22</div>

SF-424D (Rev. 7-97) Back

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2022

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4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Mayor
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Newton, ESG Program	6/9/22

SF-424D (Rev. 7-97) Back

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2022

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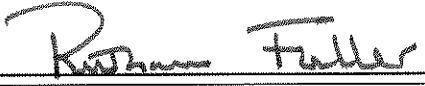
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12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Mayor
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Newton, HOME Investment Partnerships Program	6/9/22

SF-424D (Rev. 7-97) Back



**CERTIFICATIONS**

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

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

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

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

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

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

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

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

Kevin Fuller  
Signature of Authorized Official

6/9/22  
Date

Mayor  
Title

## Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

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

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

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

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

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

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

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

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

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

**Excessive Force** -- It has adopted and is enforcing:

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

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

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

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

Ruthann Fuller  
Signature of Authorized Official

6/9/22  
Date

Mayor  
Title

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**OPTIONAL Community Development Block Grant Certification**

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

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

\_\_\_\_\_  
Signature of Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title

**Specific HOME Certifications**

The HOME participating jurisdiction certifies that:

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

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

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

Ruthann Fuller  
Signature of Authorized Official

6/9/22  
Date

Mayor  
Title

## Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

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

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

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

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

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

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

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

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

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

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

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

Richard Fuller  
Signature of Authorized Official

6/9/22  
Date

Mayor  
Title

## Housing Opportunities for Persons With AIDS Certifications

The HOPWA grantee certifies that:

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

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

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

\_\_\_\_\_  
Signature of Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title



## **APPENDIX TO CERTIFICATIONS**

### **INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:**

#### **Lobbying Certification**

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

CITY OF NEWTON

IN CITY COUNCIL

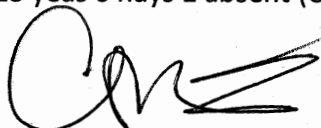
June 6, 2022

ORDERED:

That, in accordance with the recommendation of the Zoning & Planning Committee through its Chair Deborah J. Crossley, the following item be and is hereby voted APPROVED:

**#274-22      Request for authorization to submit FY2023 Annual Action Plan**  
**HER HONOR THE MAYOR** requesting City Council authorization, pursuant to the 2020 Revised Citizen Participation Plan, to submit the FY23 Annual Action Plan to the US Department of Housing and Urban Development (HUD) for the City of Newton Community Development Block Grant (CDBG) and Emergency Solutions Grant (ESG) funds and the WestMetro HOME Consortium.

Under Suspension of Rules  
Readings Waived and Approved  
23 yeas 0 nays 1 absent (Councilor Norton)



(SGD) CAROL MOORE  
City Clerk