

# FY24 (FFY23) ANNUAL ACTION PLAN

# DRAFT

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

JULY 1, 2023– JUNE 30, 2024

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

*Draft 3.20.23*

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# 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 present the FY24 (FFY23) Annual Action Plan, detailing the allocation of CDBG, HOME, and ESG funds for the period of July 1, 2023 through June 30, 2024.

#### **FY24 (FFY23) FEDERAL FUNDING AMOUNTS**

Community Development Block Grant (CDBG)	\$1,864,303.00
HOME Investment Partnerships Program (HOME)	\$1,652,605.00
Emergency Solutions Grant (ESG)	\$164,388.00

***Total*** **\$3,681,296.00**

#### **COMMUNITY DEVELOPMENT BLOCK GRANT**

Based on the priorities, needs and goals identified in the FY21-25 Consolidated Plan, the City of Newton has allocated FY24 (FFY23) CDBG funds into four general categories:

- **Affordable Housing** (\$1,125,690 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** (\$275,543 or 15% of CDBG funding), to provide grants for a total of fourteen human service projects through 14 sub-grantee agencies during FY24.
- **Architectural Access** (\$90,210 or 5% of CDBG funding), to construct an accessible route to the exterior entrance of the City Hall elevator through crosswalk improvements, improved signage, and the reconstruction of curb ramps.
- **Program Administration** (\$372,860 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**

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

In addition to the categories mentioned above, Fair Housing will 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 FY24, 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 recently contracted with the Housing Discrimination Testing Program (HDTP) at Suffolk University Law School to conduct a two-year Fair Housing testing study throughout the 13 HOME communities. Approximately ten tests will be conducted in each of the communities over the next two years to assess the level of race (black) and voucher-based discrimination in the rental housing market.

The parking cost associated with development was also identified as a potential barrier to affordable housing in the Consortium's AI report. To determine the existence of this barrier, the Consortium partnered with MAPC to complete a parking utilization study of over 40 large multi-family, mixed-income and affordable developments built since 2000. MAPC staff will assess whether parking requirements meet or exceed demand in new developments. The study, referred to as Phase IV of MAPC's Perfect Fit Parking Initiative, will culminate in a final memo to the Consortium and is expected to be complete in the Spring of 2023.

### **Affordable Housing**

Approximately 60 percent of FY24 CDBG funding (\$1,125,690) plus \$132,000 in estimated FY24 (FFY23) program income, for a total of \$1,257,690, will be allocated towards affordable housing projects. This funding will 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

A total of \$230,000 of these funds were specifically earmarked for the West Armory Affordable Housing Development project.

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

In FY24 (FFY23), 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. 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 support projects that provide Newton seniors with the opportunity to remain in the community as they age, as well as those that affordably house families. Additionally, the Division will identify projects that expand the stock of accessible and visitable housing.

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 nine units for chronically homeless adults with disabilities. To successfully provide permanent supportive housing for these nine individuals, 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, with initial occupancy expected in April 2023.

The development of the Newton Housing Authority (NHA)'s Haywood House will be complete by early FY24, with initial occupancy expected in April 2023. The 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 with incomes ranging 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 that are affordable to households earning 30-60% of the Area Median Income. At a public hearing in April of FY23, the Planning and Development Board voted to approve a pre-commitment of FY24 and FY25 CDBG funds

(total of \$930,000) and FY24 HOME funds (\$132,023.50), and the City's Inclusionary Zoning funds, to develop the Armory into affordable housing with supportive services. The Armory project received its Chapter 40B Comprehensive Permit from the Newton Zoning Board of Appeals and submitted a One Stop Application to DHCD for LIHTC financing in January 2023. The project is expected to be complete in FY26.

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

In FY24, 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 were 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. The units with the greatest infrastructure and safety needs were prioritized in the queue. The CDBG-funded rehabilitation will continue throughout the first half of FY24.

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 of 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, and will improve the quality of life for senior residents. Construction began in the Summer of 2021 and is expected to be completed in September of 2023.

***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 homebuyers are expected to be assisted through the CDBG Downpayment/ Closing Cost Assistance program in FY24.

***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 FY24 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 rehabilitation work on 7 of the 13 properties acquired by the Newton Housing Authority from CAN-DO's portfolio of rental properties. Newton utilized \$551,352 of CDBG funds to support the rehabilitation of 16 of these low-income rental units.

The Housing Authority maintains an additional 57 units of low-income rental housing, across 13 developments, known as its Management Program (93 units in total, including the 36 CAN-DO units). 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 the Management Program portfolio. The assessment revealed significant needs at several properties, totaling \$2,924,044 in recommended Year 1 expenditures alone. The NHA undertook some of the recommended improvements but does not have adequate resources to address all the recommendations in the capital needs assessment. In FY24, the City will continue to work with the NHA to identify CDBG- and HOME-eligible rehabilitation projects to support the preservation of these essential affordable units.

Finally, following a substantial amendment, the City approved and committed \$100,000 in FY22 CDBG funds to the rehabilitation of Nonantum Village Place (NVP). NVP was built in 2003 with funding through HUD's 202 Supportive Housing for the Elderly program, the City of Newton, Newton Housing Authority, and additional state and private funds. NVP is an architecturally detailed wood-frame building with 34 one-bedroom units and an on-site resident manager unit. Some building amenities include seven fully accessible units, a twelve-car parking lot, a community kitchen, dining room, large sitting room, laundry room, and staff offices. All units were built with universal design features to allow for aging in place. NVP is home to older adult households earning less than 50% of the Area Median Income (AMI), with most residents earning less than 30% AMI. The rehabilitation includes replacement of all three levels of roofing; installation of new insulation, siding, and trim; upgraded air conditioning systems; as well as painting of the entire building. Project work began in FY22 and will be completed in late FY23 or early FY24.

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

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

HUD caps the Human Service allocation at 15 percent of the City's total annual CDBG grant. The FY24 (FFY23) Human Service Request for Proposals (RFP) was released on January 4, 2023. 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. Proposals were ranked on February 13, 2023, 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 15 proposals, all of which will be awarded Human Service grants during the FY24 (FFY23) 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 support to assist in stabilizing vulnerable individuals and families across the lifespan.

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<b>FY24 Human Service Allocation Recommendations</b>		
<b>Agency</b>	<b>Program</b>	<b>FY24 Award</b>
West Suburban YMCA	Childcare Financial Aid Program	\$24,900.00
Horace Cousens Industrial Fund	Emergency Grants for Vulnerable Individuals and Families	\$24,900.00
Newton Community Development Foundation	Resident Services Program	\$35,000.00
Newton Housing Authority	Resident Services Program	\$35,000.00
The Second Step	Community Programs for Adult Survivors of Domestic Violence	\$35,000.00
Family ACCESS	Social Mobility for Young Families	\$15,000.00
2Life Communities (formerly JCHE)	CaringChoices and Wellness Nursing for Low-Income Seniors	\$15,000.00
Newton Dept. of Parks, Recreation, and Culture	Financial Aid for Youth Summer Camp	\$14,900.00
John M. Barry Boys & Girls Club of Newton	Financial Aid for Teens and Families	\$24,900.00
The Carroll Center for the Blind	Career and Vocational Rehabilitation Services for the Blind and Visually	\$13,000.00
Jewish Family and Children's Services	Stabilization and Recovery Services	\$15,300.00
Plowshares Education Development Center	Tuition Assistance for Pre-School and School-Age Care	\$11,000.00
Jewish Big Brothers & Big Sisters (JBBBS)	JBBBS Mentoring Initiatives	\$10,000.00
Pathway to Possible	Part Time Funding for P2P Clinical Social Worker	\$10,000.00
Riverside Community Care	Mental Health Services Promoting Health, Well-Being, and Self-Sufficiency	\$21,700.00
<b>TOTAL</b>		<b>\$305,600.00</b>

## **Architectural Access**

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

Approximately 5 percent of CDBG funding (\$90,500) will be allocated toward the removal of material and architectural barriers restricting mobility and accessibility of elderly or severely disabled persons, through public thoroughfares, public buildings, parks and recreational facilities, and nonprofit agencies. In FY24, \$42,000 will support the reconstruction of two existing curb ramps at City Hall Drive to create an accessible route to the exterior entrance of the City Hall elevator. Additional work includes crosswalk improvements, improved signage, and the closing of one existing curb ramp. The remainder of the FY24 architectural access funding, \$48,210, will be reserved for future projects.

Also, in FY24, the construction of two accessible crossings at the three-way intersection of Langley Road, Warren Street and Chase Street will be completed (utilizing FY23 CDBG funds).

## **Program Administration**

HUD caps the program administration allocation at 20 percent of the City's total annual CDBG grant. As a result, \$372,860 plus an estimated \$40,000 in program income, for a total of \$412,860, 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.

In FY24, the Consortium will receive a total of \$1,652,605. 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. The Pool funds are available for use by any member community through an annual Request for Proposals (RFP) process.

The Consortium will focus on three goals in FY24:

- **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 30 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 Town of Brookline and the Cities of Framingham and Waltham will advance several projects to rehabilitate housing authority units in FY24. HOME funds will be used to rehabilitate six rental units at the Brookline Housing Authority's 154-156 Boylston Street Apartments. Accessibility improvements at the Waltham Housing Authority's Beaverbrook Apartments, a 60-unit elderly development including 27 HOME-assisted units, are expected to be complete in FY24. Framingham is partnering with its local Housing Authority to rehabilitate and redevelop Carlson Crossing, a phased project that will rehabilitate 125 units and produce 7 units, including a total of ten HOME units. Additionally, as mentioned above, the HOME-funded comprehensive rehabilitation of 2Life Communities' Coleman House in Newton will preserve 146 units of affordable senior housing.

- **Production of Affordable Units**

Brookline will commit FY24 HOME funds to Hebrew Senior Life's 108 Centre Street project, which includes 54 deed-restricted affordable units of assisted living. The 2Life Communities' Golda Meir House Expansion Project in Newton is expected to be complete and occupied in FY24. This project will generate 68 affordable rental units for seniors, including nine units for chronically homeless adults with disabilities. Throughout FY24, progress will continue in the City's redevelopment of the West Newton Armory to create 43 units of intergenerational, affordable housing.

### **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 5, 2022, 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 FY24 (FFY23) ESG funding priorities across its eligible components, outlined below:

- **Emergency Shelter Services** (\$98,307.00 or 59.8%): 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** (\$27,289.00 or 16.6%): 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** (\$26,460.00 or 16.1%): 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 4, 2023, the FY24 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). Proposals were ranked on February 17, 2023, 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 six proposals from five nonprofit agencies, of which, five proposals will receive an ESG grant during the FY24 (FFY23) program year, following the recommendations of the ESG RFP Review Committee.

<b>FY24 ESG Allocation Recommendations</b>		
<b>Agency</b>	<b>Program</b>	<b>FY24 ESG Recommendations</b>
<b>Emergency Shelter Services</b>		
Community Day Center of Waltham	CDCW Case Management: Wrap Around Services	\$43,180.00
REACH Beyond Domestic Violence	REACH Emergency Shelter Operations	\$25,060.00
The Second Step	Transitional Living Program - TH Component	\$30,070.00
<b>Homelessness Prevention</b>		
Brookline Community Mental Health Center	Homelessness Prevention Program	\$27,290.00
<b>Rapid Re-housing</b>		
Brookline Community Mental Health Center	Rapid Re-Housing Program	\$26,460.00
<b>Program Administration</b>		
City of Newton	Administration	\$12,300.00
<b>TOTAL</b>		<b>\$164,360.00</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.*

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 selected Barrett Planning Group in June of 2022, to develop the HOME-ARP Allocation Plan.

The Barrett Planning Group held virtual consultations with homelessness providers, housing authorities, fair housing organizations, disability organizations, housing developers, and many more providers and organizations across the Consortium. These consultations were conducted from October through December 2022 to begin gathering data and input on the needs of

households experiencing homeless, at-risk of homelessness, and other vulnerable populations (“qualifying populations”). Additionally, three virtual community meetings were held in December 2022 to gather public input on the needs of qualifying populations. At the same time, a public survey was open to gather additional input from community members who could not attend virtual meetings. Lastly, the Barrett Planning Group conducted an in-person consultation with the Community Day Center of Waltham to speak to their clients, most of whom are chronically homeless, and gather further insight and input on the needs of those experiencing homelessness within the Consortium. The Barrett Planning Group is consolidating and analyzing the data to produce the Needs Assessment and Gap Analysis which will inform the entire HOME-ARP Allocation Plan.

The HOME-ARP Allocation Plan, scheduled to be submitted to Department of Housing and Urban Development in March 2023, will describe the current regional unmet housing and program delivery needs, the proposed HOME-ARP activities, and the production goals of affordable rental units.

### **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 August 31, 2022. 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 FY22 (FFY21) CAPER, this hearing took place before the Planning and Development Board on September 12, 2022. 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 FY22 (FFY21) CAPER was submitted on September 30, 2022. A public notice of the hearing and subsequent comment period was published in MetroWest Daily and the Boston Herald and announced in the City’s digital Friday Report. The public notice and report were 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 FY24 Annual Action Plan was available for public review on Wednesday March 22, 2023, in advance of the virtual public hearing held by the Planning and Development Board on Monday, April 3, 2023. Detailed instructions for public participation in the meeting via ZOOM were included in the City’s public hearing notice. The public comment period began April 3, 2023, and will end Tuesday, May 2, 2023.

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**

TBC

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

TBC

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## 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.

### **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.

HUD awarded the BoS CoC a total of \$23,903,338.00 in FFY22 CoC funding, an increase of approximately three million dollars from the prior year. From that total, the BNWW region received \$3,342,642.00 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.

**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 5, 2022, Division staff consulted with the former BNWW CoC local providers and representatives from the BoS CoC and four municipalities to finalize FY24 (FFY23) 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 4, 2023, and due on February 1, 2023.

DRAFT

**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.	
<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	Staff from the Brookline Planning Department met with members of the Brookline Age Friendly Committee, a group of senior Town residents who work to improve the lives of senior citizens in the Town. This consultation discussed issues and needs for seniors in Brookline concerning affordable housing, homelessness and public services. The meeting yielded a better understanding of the priority needs that seniors face in the community and priority projects.	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	The Housing Advisory Board is appointed by the Brookline Select Board and charged with making recommendations on housing policy for the Town. Staff from the Brookline Planning Department attended the monthly HAB meetings to consult with members and Town residents on the Town's housing needs.	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 Fair Housing Subcommittee of the Brookline Commission on Diversity, Inclusion and Community Relation to discuss housing, with a focus on fair housing, and other community development needs.	The information gained will guide the priorities for the CDBG and HOME Annual Action 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 attended a group meeting with staff members from the Brookline Center for Community Mental Health to discuss homelessness, affordable housing, and public service needs in the Town. The outcome is a better understanding of the needs of the town's most vulnerable residents. The assessment helped to form the goals and priorities in the Consolidated Plan and will assist the Town identify strategies to overcome needs and issues of the populations the center serves.	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 met with the Brookline Council on Aging. The focus of the meeting was to understand seniors' needs in the Town which will help decision makers identify priority projects and services in the future.	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.

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 Community Foundation	Housing	Civic Leaders	Housing Need Assessment	Staff from the Brookline Planning Department held a one-on-one meeting with staff from the Brookline Community Foundation to learn more about their programs and priorities for funding. The outcome was a more thorough knowledge of the housing and community development needs in Brookline, a better understanding of organizations in Brookline doing similar work and ideas for future collaboration.	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	The Brookline Planning Department held a meeting with Pine Street Inn staff to discuss the development of affordable housing needs for individuals who are very low-income and for homeless individuals and families. There was also a discussion on public service needs for homeless individuals. The outcome of the consultation included information on how new development or rehab of existing housing can support the formerly homeless and which public services the Town could focus on to assist the homeless.	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.
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 capital needs in property-owned by BCDC.
Center Communities	Housing	Services-Elderly Persons	Housing Need Assessment	Staff from the Brookline Planning Department attended a group meeting with Center Communities staff, a local senior affordable housing developer. The outcome of the consultation is a better understanding of affordable housing needs in the Town facing seniors, social service needs for seniors, and infrastructure issues in the Town. This information contributed to the assessment of major needs and informed goal-setting for the Consolidated Plan.	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 public meeting hosted by the Town of Brookline Commission on Disability. This group included professionals working in fields that serve the persons with disabilities. The anticipated outcome is a better understanding of the needs of persons with disabilities and how federal funds can be utilized to meet these needs.	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	The Brookline Planning Department staff consulted with the Town of Brookline Department of Health on lead-paint issues in the Town as well as the housing availability and affordability of housing.	Additional information to educate the public, especially landlords and tenants to identify lead paint and understand their rights.
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.	The anticipated outcomes include addressing the needs of BHA residents in regards to both public services and investments in BHA capital 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.	

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>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	
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	
Framingham Health Department	Other government- Local	Services- Health	Lead-Based Paint Strategy	Interviews	
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	
Family Promise	Regional Organization	N/A	Homeless Needs, Homeless Strategy	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 Authority	Public Housing Authority	Public Housing Authority	Public Housing Needs	The LHA was consulted to confirm ongoing programs and responses to public housing items.	
<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		

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?
Natick Veteran's Agent	Other government - Local		Homelessness Needs - Veterans	Interviews and focus groups	Improved coordination and the inclusion of the organization's input in the Annual Action Plan.
Natick Police Department	Other government - Local		Homeless Needs - Chronically homeless		
Family Promise	Housing	Services-homeless	Homeless Needs - Families with children		
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	
Needham Civic Entities	Housing		Housing Needs Assessment	Meetings/Survey	Increased support and collaboration in the implementation of the Housing Plan
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.	

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?
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.	The anticipated outcomes include improved coordination with the organization and the inclusion of its pertinent input in the Consolidated Plan and Annual Action Plan.
Metropolitan Area Planning Council (MAPC)	Planning organization		Housing Need Assessment	Staff solicited comments from MAPC on the draft Consolidated Plan.	
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.	
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.	

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 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.	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 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 April 3, 2023.	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.	



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>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.	
<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 Division to discuss project scoping. City and the WHA also discuss potential projects using HOME, CDBG, CPA, DHCD, local funds, and local funding sources.	Allocation of funds for safety and ADA improvements at WHA's Beaverbrook Housing complex and other sites.
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.

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?
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.
City of Waltham Master Plan Special Committee	Other Gvt.-Local	Other Government Local	Housing Needs Assessment	Meetings hosted by the City Council Special Committee members and Housing Division staff to hear input on housing and other community development needs for updating the City's Master Plan	Improved coordination to address housing and other needs for the updating of the City's Master Plan
<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 Affordable Housing Trust	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 FY24 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	
FFY22 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	
2022 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	
FY23 (FY22) Annual Action Plan - CDBG program	Town of Brookline	
Brookline Housing Authority FY23 Strategic Plan	Brookline Housing Authority	
Envision Concord; Bridge to 2030	Town of Concord	
Concord Housing Production Plan, 2022	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	
Housing Plan, 2023	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	
FY2021 Quarter Reports, Emergency Solutions Grant Subrecipients	City of Newton	
City of Newton, Health and Human Services Department, Division of Social Services, FY22 (FFY22) 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 FY24 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 Comprehensive Plan, TBA 2023	Town of Watertown	
Watertown Comprehensive Plan, 2015	Town of Watertown	
Watertown Housing Plan, 2021-25	Town of Watertown	
Wayland Housing Production Plan, 2022	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 several 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 April 3, 2023. 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 are 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 MetroWest Daily as well as the Boston Herald during the week of March 19, 2023. The notice provided contact information for the City's ADA

coordinator and telecommunications relay service, for anyone seeking to request reasonable accommodation.

#### *HOME-ARP Allocation 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 selected Barrett Planning Group in June of 2022, to develop the HOME-ARP Allocation Plan.

The Barrett Planning Group held virtual consultations with homelessness providers, housing authorities, fair housing organizations, disability organizations, housing developers, and many more providers and organizations across the Consortium from October through December 2022 to begin gathering data and input on the needs of households experiencing homeless, at-risk of homelessness, and other vulnerable populations (“qualifying populations”). Additionally, three virtual community meetings were held in December 2022 to gather public input on the needs of qualifying populations. At the same time, a public survey was open through January 12, 2023, to gather additional input from community members who could not attend virtual meetings. Lastly, the Barrett Planning Group conducted an in-person consultation with the Community Day Center of Waltham to speak to their clients, most of whom are chronically homeless, and gather further insight on the needs of those experiencing homelessness within the Consortium. The Barrett Planning Group is consolidating and analyzing the data to produce the Needs Assessment and Gap Analysis which will inform the entire HOME-ARP Allocation Plan.

The HOME-ARP Allocation Plan, scheduled to be submitted to Department of Housing and Urban Development in March 2023, 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 HOME-ARP Allocation Plan, in particular the needs identified within the Plan, will also inform future HOME funded projects.

#### *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, Concord Municipal Affordable Housing Trust, 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 and issue recommendations on 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 as part of the public hearing process. All HAB meetings are open to the public and advertised on the Town's website and blog. 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 FY24 (FFY23) Annual Action Plan. In 2022, Brookline released an updated five-year Housing Production Plan. The Plan builds on housing, social, economic, and real estate data, a robust community engagement process, a housing needs assessment, housing production goals and other local and regional planning studies.

The City of Framingham's Community Development Committee (CDC) holds a series of meetings and public hearings during the fall and winter of each year to determine allocation priorities for the following fiscal year. As part of the planning process, Community Development Program (CD) staff recommended a budget to the mayor that is ratified by the City Council.

The Town of Natick's two housing committees: the Natick Affordable Housing Trust (Natick AHT) and the Community Development Advisory Committee (CDAC) meet concurrently every month to discuss and advocate for affordable housing. The CDAC focuses on planning and establishing housing goals while overseeing the Natick Housing Production Plan and the WestMetro HOME strategic plans. In contrast, the Natick AHT is tasked with developing and providing affordable housing opportunities through the maintenance and expenditure of local Housing Trust funds and HOME funds.

Needham's Affordable Housing Trust conducts meetings to discuss housing initiatives and other housing-related issues, including those related to the HOME Consortium. The Trust holds meetings at least twice a year with special meetings as needed, which the public is notified of and encouraged to attend. Since October 2021, Needham has been in the process of preparing an updated Housing Plan. 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 to coordinate the preparation of the plan. The working group approved the plan at the end of 2022. Fundamental to this planning effort was a community engagement process that included public forums, a community workshop, interviews, and a survey. This multi-faceted approach ensured that residents and housing stakeholders had ample opportunity to express their thoughts about local housing needs and priority strategies to address those needs. The Select Board and the Planning Board adopted the Housing Plan in January of 2023. The Needham Affordable Housing Trust met in February to discuss the Plan's recommendations and the next steps in implementation.

The Waltham Housing Division and Planning Departments hold meetings and discussions with social service agencies, affordable housing advocates, and city boards and commissions to provide input on the FY24 Annual Action Plan. Notably, from September through December 2022, Waltham conducted seven city council special committee public input meetings for the update of the City's Master Plan. Meetings were conducted in each of the City's wards to solicit input on community development goals including housing creation and barriers to affordable

housing. In addition, targeted master plan input sessions were held with city departments, Waltham senior citizens, local veterans, and social service/non-profit organizations. Additional meetings will be held in early 2023.

In September 2022, the Watertown Affordable Housing Trust replaced the Housing Partnership as the City's body charged with the creation and preservation of affordable housing. The Trust's Board consists of the city manager and six volunteer members appointed by the city manager and confirmed by the City Council. The Trust uses email to announce its meetings and agendas. The Watertown components of the FY24 (FFY23) Annual Action Plan were reviewed and approved by the Trust.

DRAFT



**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	Public forum, survey and focus group for the 2022 Housing Production Plan; Housing Needs Assessment and identification of location based sites for affordable housing	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 for the 2022 Housing Production Plan	2022 Housing Production Plan	N/A	N/A
<b>CONCORD</b>					
Public Meeting	Non-targeted/broad community	No projects to review	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 and approved the Annual Action Plan at the March meeting	N/A	N/A
<b>LEXINGTON</b>					
Public Meeting	Non-targeted/broad community	Lexington Housing Partnership will review the Vynebrook project when funds are committed.	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>NEEDHAM</b>					
Public Meetings	Non-targeted/broad community	A series of public meetings, a community workshop, and survey was conducted as part of the process in preparing an updated Housing Plan, completed in December 2022.	Broad support for a wide range of actions to create greater housing diversity and affordability	N/A	N/A
<b>NEWTON</b>					
Public Meeting	General	17 attendees	On February 1, 2023 the Fair Housing Committee discussed the FY24 AAP and the testing by the Housing Discrimination Testing Program (HOTP) at Suffolk University Law School which is scheduled to begin in March, 2023.	N/A	Fair Housing Committee
Public Meeting	General	13 attendees	The BNWW CoC discussed funding priorities for FY24 ESG and in a special meeting the non-recipients voted on funding priorities (December 5, 2023).	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 FY24 Human Service program awards (February 13, 2023). Discussion focused on FY24 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 FY24 ESG awards (February 17, 2023). Discussion focused on FY24 applications, past performances, funding priorities and allocation recommendations.	N/A	ESG RFP Review Committee
Committee Meeting	General	14 attendees	On February 21, 2023 the Newton Housing Partnership discussed the FY24 AAP.	N/A	Newton Housing Partnership
Public Meeting	General	12 attendees	The COD discussed the FY24 AAP process and made a recommendation to use FY24 CDBG funds for the City Hall exterior access improvement project on December 12, 2022.	N/A	Commission on Disability
Public Hearing	General	TBD	Presentation of draft FY24 Annual Action Plan and summary of activities to be undertaken during FY23/FFY22 on April 3, 2023.	TBD	P&D Review
Public Hearing	General	TBD	Presentation of draft FY24 Annual Action Plan and summary of activities to be undertaken during FY24/FFY23 on April 11, 2023. The ZAP recommended the Annual Action Plan for submission to HUD.	TBD	Zoning and Planning Committee
<b>SUDBURY</b>					
Public Meeting	Non-targeted/broad community	No projects to review	None Received	N/A	N/A
<b>WALTHAM</b>					
Public Meeting	Non Targeted Outreach	Meeting to discuss the Draft Annual Action Plan and invite comments from community members.	Presentation of draft FY24 Annual Action Plan and summary of activities to be undertaken during FY24/FFY23 January, 2022.	N/A	N/A
Internet Outreach	Non-targeted/broad community	From September to December 2022, Waltham conducted 7 City Council Special Committee Public Input Meetings for the City's Master Plan. Meetings were conducted in each of the City's wards to solicit input on goals and policies, land use, housing, economic development, open space, recreation, and natural/cultural resources for a future update of Waltham's Master Plan. In addition, small group input meetings were held with Waltham senior citizens, local veterans, and social service/non-profit agencies. Additional meetings will be held in early 2023 with the Waltham business community, Boards & Commissions and schools.	Hundreds of comments were received. The data will be compiled for use in the next phase of the process to update the Master Plan.	N/A	N/A
Public Meeting	Non-targeted/broad community	Meeting to discuss the Draft Annual Action Plan and CDBG application release and invite comments from community members.	Presentation of draft FY24 Annual Action Plan, CDBG application release and summary of activities to be undertaken during FY24/FFY23	N/A	N/A
<b>WATERTOWN</b>					
Public Meeting	Non-targeted/broad community	Meeting of the Watertown Affordable Housing Trust	None Received	N/A	N/A
<b>WAYLAND</b>					
Public Meeting	Non-targeted/broad community	Wayland Select Board reviewed the HOME funds for the new project at Hammond Road	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 \$3,681,296.00 in CDBG, HOME and ESG funds, plus an additional \$214,000 in program income, during the July 1, 2023- June 30, 202 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, Community Preservation Act (CPA) funding will supplement federal HOME and CDBG funds, to produce and preserve affordable units wherever possible. CPA funding provides the flexibility to generate mixed-income developments, because it can be used to support households earning up to 99% of AMI. Inclusionary Zoning (IZ) funds, which are paid to the City by developers of multi-family housing projects in lieu of providing affordable on-site units, further complement these resources. 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, facilitates 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 FY22 (FFY21), the ESG program exceeded its requirement and leveraged approximately \$648,587.00 in matching funds with a combination of state and private funds. While the Human Services program does not have a matching requirement, in FY22 (FFY21), the program leveraged approximately \$3,241,780.00 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 FY24, the Town of Brookline will oversee the progress of the Hebrew Senior Life (HSL) expansion at 108 Centre Street, a HOME-assisted age-restricted housing development project. The 38-million-dollar project entails the production of 54 one-bedroom new rental housing units targeted to very low-income and low-income populations. HSL's expects construction at 108 Centre Street to begin in May 2023 with full occupancy during the Summer of 2024. The Town set aside CDBG, HOME, and Housing Trust funds to leverage private investment in the form of sponsor loans, bonds and Low-Income Housing Tax Credit equity.

In 2021, Brookline residents voted to adopt the Community Preservation Act and the Town is working on adopting policy for its Community Preservation Fund. Brookline finances the CPA program, in part, through a one-percent surcharge on residential and commercial property tax bills. The CPA surcharge collection took effect in 2022 and the Brookline Planning Department hired a CPA planner for the administration of these funds.

In Concord, the Concord Housing Development Corporation (CHDC) owns two separate parcels of land on which to create affordable housing. The CHDC is beginning to solicit indications of interest for each of the properties – the 1-acre Assabet River Bluff property and the 12-acre Junction Village property. In FY23, plans to develop an affordable assisted living development on the Junction Village property terminated due to financial and political reasons.

In Lexington, the Lexington Housing Authority will undertake an extensive rehabilitation effort in its Vynebrook Village development. This larger project is supported and funded by DHCD, with an additional commitment of HOME funds.

A total of \$400,000 in municipal funds (\$80,000 per year) have been allocated to the Natick Affordable Housing Trust (AHT) to develop affordable housing. These funds will be augmented by fees paid to the Natick AHT by housing developers under Natick's new inclusionary requirements for affordable housing. In 2022, the Natick Planning Board approved projects that require payment in-lieu of the construction of affordable units.

In January 2023, Waltham earmarked \$200,000 in City American Rescue Plan Act (ARPA) funds for emergency rental assistance. This supplements the \$100,000 in Housing Trust funds, \$1,000,000 in Community Preservation Act funds and \$965,000 in CARES Act funds for emergency rental assistance. In addition, the City is using Housing Trust Funds for the renovation of a city-owned historic property at the former Fernald Development Center site to create two units of affordable housing. This project is currently in phase one of construction and has a \$1,179,000 budget.

Waltham HOME fund expenditures are matched annually with MVRP vouchers. The ongoing ADA upgrade project at the Waltham Housing Authority's Beaverbrook Senior Apartments is using a mixture of HOME (\$400,000), CDBG (\$400,000) and DHCD (\$800,000) funding. This project is in the design phase and has been assigned an architect from the Waltham Designer Selection Board.

The Wayland Housing Trust is developing a single unit of affordable low-income rental housing, funded with local Community Preservation Funds and HOME funds.

The second round of Community Preservation Act (CPA) funding in Watertown is now underway, with one housing project under consideration. The City has over \$13 million in the CPA reserve and the expected annual revenue stream is over \$2 million; providing a leveraging source for future HOME projects. 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. Finally, in December 2022 the Governor signed legislation authorizing the city to set an affordable housing linkage fee on new commercial development. Proceeds from this fee would go to the new Affordable Housing Trust to support affordable housing.

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

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 nine units for chronically homeless adults with disabilities. To successfully provide permanent supportive housing for these nine individuals, 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, with initial occupancy expected in April 2023.

The development of the Newton Housing Authority (NHA)'s Haywood House will be complete by early FY24, with initial occupancy expected in April 2023. The 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 with incomes ranging 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 that are affordable to households earning 30-60% of the Area Median Income. At a public hearing in April of FY23, the Planning and Development Board voted to approve a pre-commitment of FY24 and FY25 CDBG funds (total of \$930,000) and FY24 HOME funds (\$132,023.50), and the City's Inclusionary Zoning funds, to develop the Armory into affordable housing with supportive services. The Armory project received its Chapter 40B Comprehensive Permit from the Newton Zoning Board of Appeals and submitted a One Stop Application to DHCD for LIHTC financing in January 2023. The project is expected to be completed in FY26.

In FY24, 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 were 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. The units with the greatest infrastructure and safety needs were prioritized in the queue. The CDBG-funded rehabilitation will continue throughout the first half of FY24.

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 of 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 and will improve the quality of life for senior residents. Construction began in the Summer of 2021 and is expected to be completed in September of 2023.

Finally, following a substantial amendment, the City approved and committed \$100,000 in FY22 CDBG funds to the rehabilitation of Nonantum Village Place (NVP). NVP was built in 2003 with funding through HUD's 202 Supportive Housing for the Elderly program, the City of Newton, Newton Housing Authority, and additional state and private funds. NVP is an architecturally detailed wood-frame building with 34 one-bedroom units and an on-site resident manager unit. Some building amenities include seven fully accessible units, a twelve-car parking lot, a community kitchen, dining room, large sitting room, laundry room, and staff offices. All units were built with universal design features to allow for aging in place. NVP is home to older adult households earning less than 50% of the Area Median Income (AMI), with most residents earning less than 30% AMI. The rehabilitation includes replacement of all three levels of roofing; installation of new insulation, siding, and trim; upgraded air conditioning systems; as well as painting of the entire building. Project work began in FY22 and will be completed in late FY23 or early FY24.

Finally, the City will be exploring the feasibility of redeveloping a parcel of land, recently acquired by Newton, into affordable housing. The site contains four existing homes and was purchased by the City through its one-time allocation of ARPA Funds. In FY23, Newton was awarded a \$235,000 Housing Choice Grant from DHCD to hire a consultant to assess the feasibility of redeveloping the site. The City anticipates releasing an RFP in late FY23 and hiring a consultant to complete the feasibility study by early FY24. The next step will be to select a developer for the site through a second RFP process, which the City aims to do by the end of FY24.

#### *Consortium Communities*

The Town of Belmont is planning to redevelop Sherman Gardens, an elderly/disabled Public Housing complex located in Belmont's Waverley Square neighborhood. In late 2024/early 2025 the Town plans to begin rebuilding Sherman Gardens as a 135-unit affordable housing complex.

The 2022 Brookline Housing Production Plan identified two town-owned sites through location-based testing for future affordable housing development purposes: the Babcock Street parking lot and the Newbury West Site. Those sites might be candidates for potential redevelopment but will require further analysis and testing.

In Concord, the Concord Housing Development Corporation (CHDC) owns two separate parcels of land on which to create affordable housing – the 1-acre Assabet River Bluff property and the 12-acre Junction Village property. The CHDC is beginning the process to solicit indications of interest for each of the properties. In FY23, plans to develop an affordable assisted living development on the Junction Village property terminated due to financial and political reasons.

Natick is in the early stages of issuing an RFP for a former school property located at 5 Auburn Street. The Natick Affordable Housing Trust will support an affordable component to the project if the property is redeveloped into residential units.

Needham continues to support the Needham Housing Authority plans to modernize its federally sponsored developments at Seabeds Way, Captain Robert Cook Drive, and High Rock as well as improve its state developments of Linden and Chambers. The funding of these future projects will likely include local HOME funds.

The Town of Wayland has completed the sale of a town-owned parcel for the development of a 218-unit multi-family rental community, which is now occupied. Fifty-five of the units are designated affordable. This development, Rivers Edge, serves the need of low-moderate income families and adds housing choices for the increasing senior population in Wayland. The Wayland Housing Trust is expanding the property it owns on Hammond Road and including the construction of an additional low-income rental unit.

Waltham is currently rehabilitating a city-owned building at the former Fernald Development Center to create two units of affordable housing. The city is spending \$1,179,000 in Affordable Housing Trust funds for phase one of the project. Waltham is also exploring additional reuse opportunities for other municipal owned Fernald buildings.

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**AP-15 Anticipated Resources for City of Newton & WestMetro HOME Consortium for FY24**

Program	Source	Use of Funds	Expected Amount Available FY24 (FFY23)		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 (\$)	\$1,864,303.00	\$1,864,303.00	Please see word document for narrative.
			Program Income (\$)	\$202,000.00	\$55,000.00	
			Prior Year Resource(s)	\$30,057.00		
			Total(\$)	\$2,096,360.00	1,919,303.00	
HOME	public - federal	Homebuyer Assistance, and Creation and Rehabilitation of Rental Units. CHDO Operating and Administrative Funds.	Annual Allocation (\$)	\$1,652,605.00	\$1,652,605.00	Unexpended HOME PI is \$11,029.57 and HP is \$88,102.40
			Program Income (\$)	\$12,000.00	\$12,000	
			Prior Year Resource(s)	\$2,634,950.99		
			Total(\$)	\$4,194,395.99	\$1,664,605.00	
ESG	public - federal	Financial Assistance, Overnight Shelter, Rapid Re-housing, Rental Assistance, Homelessness Prevention Services, Transitional Housing, Street Outreach	Annual Allocation (\$)	\$164,388.00	\$164,000.00	Please see word document for narrative.
			Program Income (\$)			
			Prior Year Resource(s)			
			Total(\$)	\$164,388.00	\$164,000.00	



# 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 FY24 (FFY23) 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 FY24 (FFY23), 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 housing 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 support projects that provide Newton seniors with the opportunity to remain in the community as they age, as well as those that affordably house families. Additionally, the Division will identify projects that expand the stock of accessible and visitable housing.

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 nine units for chronically homeless adults with disabilities. To successfully provide permanent supportive housing for these nine individuals, 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, with initial occupancy expected in April 2023.

The development of the Newton Housing Authority (NHA)'s Haywood House will be complete by early FY24, with initial occupancy expected in April 2023. The 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 with incomes ranging 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 that are affordable to households earning 30-60% of the Area Median Income. At a public hearing in April of FY23, the Planning and Development Board voted to approve a pre-commitment of FY24 and FY25 CDBG funds (total of \$930,000) and FY24 HOME funds (\$132,023.50), and the City's Inclusionary Zoning funds, to develop the Armory into affordable housing with supportive services. The Armory project received its Chapter 40B Comprehensive Permit from the Newton Zoning Board of Appeals and submitted a One Stop Application to DHCD for LIHTC financing in January 2023. The project is expected to be complete in FY26.

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

In FY24, 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 were 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. The units with the greatest infrastructure and safety needs were prioritized in the queue. The CDBG-funded rehabilitation will continue throughout the first half of FY24.

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 of 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 and will improve the quality of life for senior residents. Construction began in the Summer of 2021 and is expected to be completed in September of 2023.

***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 homebuyers are expected to be assisted through the CDBG Downpayment/ Closing Cost Assistance program in FY24.

***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 FY24 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 rehab work on 7 of the 13 properties acquired by the Newton Housing Authority from CAN-DO's portfolio of rental properties. Newton utilized \$551,352 of CDBG funds to support the rehabilitation of 16 of these low-income rental units.

The Housing Authority maintains an additional 57 units of low-income rental housing, across 13 developments, known as its Management Program (93 units in total, including the 36 CAN-DO units). 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 the Management Program portfolio. 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 the recommendations. In FY24, the City will continue to work with the NHA to identify CDBG- and HOME-eligible rehabilitation projects to support the preservation of these essential affordable units.

Finally, following a substantial amendment, the City approved and committed \$100,000 in FY22 CDBG funds to the rehabilitation of Nonantum Village Place (NVP). NVP was built in 2003 with funding through HUD's 202 Supportive Housing for the Elderly program, the City of Newton, Newton Housing Authority, and additional state and private funds. NVP is an architecturally detailed wood-frame building with 34 one-bedroom units and an on-site resident manager unit. Some building amenities include seven fully accessible units, a twelve-car parking lot, a

community kitchen, dining room, large sitting room, laundry room, and staff offices. All units were built with universal design features to allow for aging in place. NVP is home to older adult households earning less than 50% of the Area Median Income (AMI), with most residents earning less than 30% AMI. The rehabilitation includes replacement of all three levels of roofing; installation of new insulation, siding, and trim; upgraded air conditioning systems; as well as painting of the entire building. Project work began in FY22 and will be completed in late FY23 or early FY24.

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

With respect to the ESG program, \$152,059 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 FY24 (FFY23), ESG funding will support five projects across four sub-grantees.

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

In addition to the categories mentioned above, Fair Housing will 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 FY24, 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 recently contracted with the Housing Discrimination Testing Program (HDTP) at Suffolk University Law School to conduct a two-year Fair Housing testing study throughout the 13 HOME communities. Approximately ten tests will be conducted in each of the communities over the next two years to assess the level of race (black) and voucher-based discrimination in the rental housing market.

The parking cost associated with development was also identified as a potential barrier to affordable housing in the Consortium's AI report. To determine the existence of this barrier, the Consortium partnered with MAPC to complete a parking utilization study of over 40 large multi-family, mixed-income and affordable developments built since 2000. MAPC staff will assess whether parking requirements meet or exceed demand in new developments. The study, referred to as Phase IV of MAPC's Perfect Fit Parking Initiative, will culminate in a final memo to the Consortium and is expected to be complete in the Spring of 2023.

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

Human service grants will support 14 public service agencies and organizations during FY24 (FFY23). An estimated total of \$305,600 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 5 percent of CDBG funding (\$90,500) will be allocated toward the removal of material and architectural barriers restricting mobility and accessibility of elderly or persons with disabilities, through public thoroughfares, public buildings, parks and recreational facilities, and nonprofit agencies. In FY24, \$42,000 will support the reconstruction of two existing curb ramps at City Hall Drive to create an accessible route to the exterior entrance of the City Hall elevator. Additional work includes crosswalk improvements, improved signage, and the closing of one existing curb ramp. The remainder of the FY24 architectural access funding, \$48,210, will be reserved for future projects.

Also in FY24, the construction of two accessible crossings at the three-way intersection of Langley Road, Warren Street and Chase Street will be completed (utilizing FY23 CDBG funds).

**HOME Consortium Goals**

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

In FY24, 30 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 present a barrier for many lower income households. A limited rental stock and rising rents in the region, problems that 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.

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

*Ongoing progress*

The Towns of Belmont, Brookline, Lexington, Needham and the City of Waltham will focus on rehabilitation of housing authority units in FY24. In FY24, Lexington plans to commit \$61,820 of local HOME funds towards a \$6,000,000 renovation effort at Vynebrook Village, a 48-unit state-aided elderly/disabled public housing. The project includes complete kitchen and bath renovations; cosmetic improvements including painting and flooring, and the conversion of three units into fully accessible ADA units.

In FY24, Brookline will continue to work with the Brookline Housing Authority to rehabilitate additional federal properties under the Rental Assistance Demonstration Program and the Capital Improvement Plan. The Town will explore support to the Brookline Community Development Corporation (formerly Brookline Improvement Coalition) to assist with HOME funds in the rehabilitation of a six unit building at 154-156 Boylston Street.

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 ten HOME designated units among the two phases.

Needham continues to work with the Needham Housing Authority on potential modernization and/or redevelopment efforts through its Preservation and Redevelopment Initiative (PRI). 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 additional CPA and request HOME funds to support these efforts.

In FY23, Waltham allocated \$400,000 in HOME Project Commitment funding towards accessibility upgrades at Beaverbrook Apartments, a 60-unit elderly apartment development owned by the Waltham Housing Authority. Twenty-seven units are anticipated to be HOME assisted units. The Designer Selection Board assigned a designer to this project in September 2022. Once a formal estimate is provided by the architect, the project underwriting can commence, and HOME funds can begin to go towards this project. Waltham Housing Authority estimates this project will be complete by December 2023. This project is also utilizing \$400,000 in CDBG and \$800,000 in DHCD funding.

Additionally, as mentioned above, the HOME-funded comprehensive rehabilitation of 2Life Communities' Coleman House in Newton, will preserve 146 units of affordable senior housing.

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

In FY24, Brookline expects to monitor construction and potential close-out of Hebrew Senior Life's 108 Centre Street Housing Development Project, a project including the construction of 54 new deed-restricted units of assisted living with eleven HOME-assisted units. The Town has committed \$861,299.94 in FY21, FY22, FY23 HOME funds and HOME program income from current and previous fiscal years to this project. In addition, the \$211,900 in FY22 HOME funds originally allocated to the Brookline Housing Authority will now be used for 108 Centre Street Housing Development. This project leverages \$4,050,000 in local funds and additional state and federal funding.

The 2Life Communities' Golda Meir House Expansion Project in Newton is expected to be complete and occupied in FY24. This project will generate 68 affordable rental units for seniors, including nine units for chronically homeless adults with disabilities.

***Ongoing progress***

Throughout FY24, progress will continue in the Newton's redevelopment of the West Newton Armory to create 43 units of intergenerational, affordable housing.

The Town of Wayland, through the Wayland Housing Trust, plans to create a new low-income rental unit at Hammond Road.

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**AP-20 FY24 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: \$412,860	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: \$724,180	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	124	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: \$255,545	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	3	8-Household housing unit
									10-Homeowner housing rehabilitated	7	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	181	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: \$164,388	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	456	23-Other - please specify
Human Services	CDBG: \$305,600	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	2,292	3-Persons assisted
Architectural Access	CDBG: \$90,210	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	1,408	1-Persons Assisted
<b>HOME CONSORTIUM</b>											
HOME Administration	HOME: \$188,055.50	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: \$1,137,636.92	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	30	12-Households Assisted
Rehabilitation of Existing Units	HOME: \$1,453,891.72	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: \$794,540.15	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	11	12-Households Assisted
									9-Homeowner housing added	0	12-Households Assisted
CHDO-Set Aside	HOME: \$490,641.45	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: \$132,630.25	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 fourth 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, \$1,125,690 combined with \$132,000 in estimated FY24 (FFY23) program income, for a total of \$1,257,690, will be allocated to affordable housing projects to be identified during the FY24 (FFY23) program year. This funding will be used to facilitate housing rehabilitation and acquisition of units for low- and moderate-income households. A total of \$230,000 of these funds were specifically earmarked for the West Armory Affordable Housing Development project.

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

The Human Service Grants will fund 14 public service agencies and organizations during FY24 (FFY23). 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 \$275,543, the maximum allowed by regulation. These funds will be combined with \$30,057 in prior year program income for a total of \$305,600 to be made available for the FY24 Human Service program.

#### **Architectural Access**

Approximately 5 percent of CDBG funding (\$90,210) will be allocated toward the removal of material and architectural barriers restricting mobility and accessibility of elderly or severely disabled persons, through public thoroughfares, public buildings, parks and recreational facilities, and nonprofit agencies. In FY24, \$42,000 will support the reconstruction of two existing curb ramps at City Hall Drive to create an accessible route to the exterior entrance of

the City Hall elevator. Additional work includes crosswalk improvements, improved signage, and the closing of one existing curb ramp.

**Program Administration**

Staff intends to allocate the maximum allowable amount of 20 percent for program administration, or \$372,860 combined with \$40,000 in anticipated FY24 (FFY23) program income, for a total of \$412,860.

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.

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**AP-35: Projects for City of Newton & WestMetro HOME Consortium for FY24**

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.	\$1,257,690.00	6/30/2024	10	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 FY24 CDBG Entitlement funds (\$275,543) plus 15% of FY23 program income (\$30,057) and FY24 estimated program income (30,000).	\$335,600.00	6/30/2024	878	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 City Hall campus exterior access improvements and other architectural access projects TBD.	\$90,210.00	6/30/2024	539	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.	\$412,860.00	6/30/2024	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.	\$188,055.00	6/30/2024	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.	\$1,137,636.92	6/30/2024	30	TBRA programs in Bedford, Framingham, Natick, Waltham, and Wayland
HOME Rehabilitation	N/A	Housing Rehabilitation	Funds for the rehabilitation of affordable rental units and income-eligible homeowner units.	\$1,453,891.72	6/30/2024	0	TBD
HOME Production of Affordable Housing		Production of Rental Units	Funds to be used for the construction of affordable housing in the Consortium	\$794,540.15	6/30/2024	11	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.	\$132,630.25	6/30/2024	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.	\$490,641.45	6/30/2024	0	CHDO projects are determined by an annual HOME RFP generally released in the fall.
ESG24 Newton (FFY23)	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.	\$164,388.00	6/30/2024	175	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 FY21-25 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 \$895,690 will be available to allocate on a rolling basis toward FY24 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, 2023 - June 30, 2024, 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 FY24 (FFY23), 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.

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 nine units for chronically homeless adults with disabilities. To successfully provide permanent supportive housing for these nine individuals, 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, followed by 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 began in the Spring of 2021. Initial occupancy of the Golda Meir House Expansion Project is expected in April 2023.

In FY20, the City awarded approval of CDBG 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 is expected to be complete by early FY24, with initial occupancy expected in April 2023.

In FY24, 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 were 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. The units with the greatest infrastructure and safety needs were prioritized in the queue. The CDBG-funded rehabilitation will continue throughout the first half of FY24.

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 of 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 and will improve the quality of life for senior residents. Construction began in the Summer of 2021 and is expected to be completed in September 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), 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 that are affordable to households earning 30-60% of the Area Median Income. At a public hearing in April of FY23, the Planning and Development Board voted to approve a pre-commitment of FY24 and FY25 CDBG funds (total of \$930,000) and FY24 HOME funds (\$132,023.50), and the City's Inclusionary Zoning funds, to develop the Armory into affordable housing with supportive services. The Armory

project received its Chapter 40B Comprehensive Permit from the Newton Zoning Board of Appeals and submitted a One Stop Application to DHCD for LIHTC financing in January 2023. The project is expected to be complete in FY26.

Finally, the City will be exploring the feasibility of redeveloping a parcel of land, recently acquired by Newton, into affordable housing. The site contains four existing homes and was purchased with the City's one-time allocation of ARPA Funds. In FY23, Newton was awarded a \$235,000 Housing Choice Grant from DHCD to hire a consultant to assess the feasibility of redeveloping the site. The City anticipates releasing an RFP in late FY23 and hiring a consultant to complete the feasibility study by early FY24. The next step will be to select a developer for the site, by the end of FY24, through a second RFP process.

In FY24 (FFY23), the City will administer programs that were successful in FY23 (FFY22) 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 FY24 will be continuing to assist the NHA to rehabilitate 7-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 7 (NHA) units will be rehabilitated in FY24 (FFY23). 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 FY24, 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*

The Town of Bedford plans to assist at least two households with HOME funded rental assistance in FY24.

The Town of Belmont Planning Board granted design and site plan approval of the Residence at Bel Mont, located in the McLean District Zone 3, a zoning overlay district which was approved by Town Meeting in 2020. The Residence at Bel Mont contains a total of 152 units, 40 of which are age restricted homeownership units. Six of these forty units are age restricted to residents earning 80% of the AMI. The remaining 112 units are rental units, 54 of which are age restricted, 58 are not age restricted. Of the rental units, 20% are affordable to those earning 80% and 5% are affordable to those earning 50% AMI.

The Town of Brookline actively supports the production and preservation of affordable housing projects through the following initiatives:

- Brookline continues to process a significant number of 40B Comprehensive Permit projects, which will add to the town's affordable housing stock. In 2022, the Town exceeded the 10 percent statutory minimum under Chapter 40B. Since the last Housing Production Plan (2016), Brookline has added 656 Chapter 40B-eligible units to the Subsidized Housing Inventory (SHI).
- 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 program, with state and local support.
- Brookline Regulatory Planning Division is preparing a study on barriers to multifamily/mixed-use development targeted to a potential overlay district in Harvard Street. This study, alongside compliance with the MBTA Communities regulation, will identify opportunities to lift barriers to multifamily/mixed-use development in pivotal areas.
- Brookline continues to support the development of affordable housing through nonprofit partnerships with Hebrew Senior Life, the Brookline Community Development Corporation, and the Brookline Housing Authority.
- The Community Preservation Act will activate and provide a significant stream of funds for the production and preservation of new affordable housing projects.
- Brookline is exploring 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 Town is in the process of establishing a working group, conducting a nexus study through a consultant, and then proceeding to the adoption of linkage fee by-law.
- 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.

In FY24, 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 funds 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. Framingham is continuing to work with the Framingham Housing Authority to redevelop 132 units in the Carlson Crossing project.

In FY24, Lexington, through the Lexington Housing Authority plans to use local HOME funds to assist in the large modernization and preservation project at Vynebrook Village.

The Natick AHT continues to fund the Tenant-Based Rental Assistance service offered by the Natick Service Council; a pilot program started in FY21. Town staff is working with the Natick Service Council to reorient the program to prevent homelessness, rather than helping homeless families with security deposits. The Natick AHT will continue to explore partnering with nonprofits to use HOME funds to a housing rehabilitation program for income-eligible households.

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 last Housing Plan was approved in 2007, 894 new units were added to Needham's Subsidized Housing Inventory (SHI), surpassing the state affordability goal of 10%. Despite reaching this threshold, Needham recognizes that significant unmet housing needs remain in the community, particularly in the context of unprecedented housing prices and the pandemic. Following the working group's acceptance of the plan in December 2022, the Select Board and Planning Board approved the Housing Plan in January 2023. The focus of the Housing Plan was to analyze updated information on demographic, economic and housing conditions, identify priority needs, and recommend actions to address these needs. The Housing Plan includes 17 major actions and eight additional recommendations for further study to better promote housing affordability and diversity in the community. The Town is already involved in the implementation of a few of these proposed strategies such as an updated Accessory Dwelling Unit (ADU) bylaw, compliance with state MBTA Communities Guidelines under Section 3A of the Zoning Act, and the NHA Preservation and Redevelopment Initiative.

Waltham's Inclusionary Zoning special permit process approves development proposals with affordable rental units. Recently built properties with affordable units include 99 Moody Street (at 80% AMI) which is currently leased, and 185 Willow Street (at 80% AMI), which is nearing construction completion. One 40B development, The Wright at 341 Second Avenue recently conducted its affordable housing lottery for 37 units at 80% AMI and 12 units at 60%. In FY23, the City granted \$189,000 in CARES COVID Emergency Assistance funding to assist low- and moderate-income households in preventing eviction. To date, a total of approximately \$2.1M emergency rental assistance (CARES, CPC and Housing Trust) funding was provided to prevent eviction for tenants from FY21 to FY23. Waltham will continue to offer emergency rental

assistance in FY24 with \$200,000 in City ARP funds. In addition, the Waltham Affordable Housing Trust funds projects that create new units of affordable housing.

The Watertown City Council adopted a 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 nearly all the City’s new affordable units have been generated by its Inclusionary Zoning requirements and production of substantial amounts of multifamily housing. In September 2022, the municipal Affordable Housing Trust officially replaced the Housing Partnership. The Trust’s initial focus will be on creating the pipeline of affordable or mixed-income projects by identifying sites, reaching out to affordable developers, and expanding its funding sources.

Watertown is now authorized to adopt an affordable housing “linkage fee” on new commercial development. The ordinance is likely to be in force before FY24 begins. However, since payments are made when buildings are ready for occupancy, the benefit of this funding will be realized in future fiscal years.

In FY24, The Town of Wayland through the Wayland Housing Trust plans to create a new low-income rental unit at Hammond Road. The Town aims to serve two households with Tenant-Based Rental Assistance in FY24.

<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):	10
Non-Homeless (for all units NOT reserved for homeless individuals and/or households):	37
Special-Needs (units reserved for households that are not homeless but require specialized housing or supportive services)	158
<b>Total (Consortium-wide) &gt;&gt;&gt;&gt;</b>	<b>205</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):	30
The Production of New Units (construction of new units, including conversion of non-residential properties):	135
Rehab of Existing Units (including reconstruction):	37
Acquisition of Existing Units (for programs such as downpayment assistance):	3
<b>Total (Consortium-wide)&gt;&gt;&gt;&gt;</b>	<b>205</b>

DRAFT

## 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.

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 the recommendations in the capital needs assessment. In FY24, 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 FY24, 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 envelopes.

#### *Consortium Communities*

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 FY24 (FFY23), 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 low-income households currently residing in Bedford Housing Authority units.

In FY24, 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 modernize 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) which is complete. The Town will continue to work with the BHA in FY24 to permit and fund a third and final project, located at 32 Marion Street. This 40B project, set to begin in 2024, will modernize and expand a 60-unit development into a 139-unit project that will be built over two phases.

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 in Opportunity Zones, which allows the potential use of traditional and non-traditional investment streams for financing. HOME funds will be among the many sources used to support this major rehabilitation initiative. In June of 2022, the City of Framingham approved a substantial amendment to commit \$400,000 in HOME program income for the Carlson Crossing project. Carlson Crossing is a tri-phased rehabilitation of the FHA's 132-unit federal development in an Opportunity Zone. Construction on Phase I, which includes the rehabilitation of seven ADA units, began in Fall of 2022 and will be complete in March of 2023. Phase II, which includes 68 units (5 HOME-assisted units) will begin in winter of 2023.

In FY24 the Lexington Housing Authority will begin construction on its extensive modernization project at Vynebrook Village.

In FY22, the Natick Affordable Housing Trust (AHT) partnered with a consultant to develop a strategic plan. The strategic plan, which is expected to be completed in FY23, will provide direction to the Natick AHT in their work to maintain and provide new housing, including the provision of resources. This plan is inclusive of the Natick Housing Authority's mission and portfolio.

The Town of Needham continues to work with the Needham Housing Authority (NHA) on plans to modernize and 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 expected to submit repositioning applications to HUD for the Seabeds Way and Capt. Robert Cook housing developments. The Town is holding Community Preservation funds in reserve for the support of such a project(s), and it is anticipated that HOME funding will be a source of financing as well.

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.

In 2022, Waltham committed \$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 Waltham Housing Division 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 five years.

In December 2021, the Watertown Housing Authority 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 expects to start construction on Phase I of this project in FY24. Concurrently, the WHA is marshalling funds for Phase 2, which is estimated at \$1.5 million. In June 2022, the WHA was awarded \$681,000 in American Rescue Plan Act (ARPA) funds to address the 72 federal pacific panels and zoned fire alarm system at Munger Apartments. The Authority also received \$704,000 in ARPA funds for state modernization, which the WHA intends to leverage for state emergency funds to address the wet basements and mold issues at the Lexington Gardens development. Finally, the WHA hopes to continue planning for special needs housing units on vacant land at 103 Nichols Avenue. The WHA has applied for \$175,000 in CPA funds for pre-development work in FY24.

**2. Update 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 the NHA. In FY23, the Resident Service Department is conducting a survey of that collected feedback from residents, including their suggestions for future programming and improvements. In FY24 and going forward, the NHA will utilize this tenant feedback in its planning processes and will continue to engage residents. In FY22, the NHA expanded its Resident Service Department by hiring a licensed social Worker to serve its family public housing residents and voucher holders. The licensed social worker is bilingual and can work with residents in both English and Spanish.

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 Belmont Housing Authority entered 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.

The Bedford, Concord, Lexington, Needham, Sudbury Housing Authorities engage tenant groups to provide feedback on general administration issues and policy decisions. A current tenant participates on the board, in accordance with new DHCD regulations.

In Brookline, as an 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 through extensive outreach. Public housing tenants interested in homeownership opportunities are notified through the Brookline Housing Authority or by signing up for the Town's affordable housing listserv. There is a successful track record of public housing tenants taking advantage of these opportunities.

Brookline's Housing Authority (BHA) 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 by encouraging residents to become actively involved and to challenge BHA's management with independent ideas and concerns. A Town bylaw requires the inclusion of two low-income tenants, including those who live in BHA properties, as members of the Housing Advisory Board.

The Framingham Housing Authority (FHA) offers various opportunities for its residents to become homeowners or participate in management that the City's 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.

Natick Housing Authority provides opportunities, such as tenant organizations, for their residents to help govern the agency.

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 was a critical component in this decision-making process. New tenants' association at the Seabeds Way and Captain Robert Cook developments bolstered tenant participation. The NHA is in the process of reviving its Tenants Association at Linden-Chambers.

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 meet with tenant groups on a regular basis or as needed, and tenants serve on the WHA board.

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 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 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 and operational issues to all the resident groups. In 2022, the Authority substantially completed a state-of-the-art learning center located at Lexington Gardens for its family residents. During FY24, the WHA will focus on using the learning center to help families move-out of public housing. Programming will include enrichment for children and training for adults to lower their debt, improve their credit score, and increase overall household income.

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

N/A



## **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 5, 2022, the cohort finalized FY24 (FFY2023) 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 16.6% and 16.1% of FY24 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 in 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 FY24.

While Division staff did not allocate FY24 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 FY24 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, on the condition the individual will seek assistance from the Natick Service Council. 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 Natick Service Council will pick up the voucher recipient the next day and connect them with further assistance. This program successfully assisted several homeless households in FY23, and the Trust will continue its operations in FY24.

The City of Waltham has allocated \$99,000 for a winter warming center for unsheltered homeless individuals 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 as well as a warm meal, bathroom/shower and laundry facilities. In addition, the shelters administered by Middlesex Human Service Agency, located in Waltham, provide overnight shelter, meals and bathroom/shower facilities, while engaging homeless persons in case management to work towards permanent housing.

## **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 hygiene and medical supplies, access to computers, case management, counseling, and referrals to detox facilities and other appropriate service providers.

The 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 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

percent 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 amid 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 to effectively end homelessness.

#### *Consortium*

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 who are not always eligible for shelter placement through DHCD. This successful partnership provides a year's worth of rental subsidies in exchange for the clients receiving extensive case management services from Family Promise.

The Natick Affordable Housing Trust will continue to use HOME funds for Tenant Based Rental Assistance in FY24. 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 bridges homeless individuals 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 the Middlesex Human Service Agency collaborate to refer homeless individuals to the TBRA Program and maintain a proactive approach in providing continued support for clients.

- 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 stabilize individuals and move 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

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. In March of 2023, the City will submit the HOME-ARP Allocation Plan, which will describe the current regional unmet housing and program delivery needs, the proposed HOME-ARP activities, and the production goals of affordable rental units. HOME-ARP activities will assist the City in helping and serving households experiencing homelessness, at-risk of homelessness,

and those fleeing domestic violence.

The Town of Brookline continues to work with the Brookline Community Foundation, the Brookline Center for Community Mental Health (BCCMH) and the Brookline Housing Authority to provide services to Brookline residents who are at risk of becoming homeless. BCCMH and the Community Foundation use funding and programmatic services to assist residents who are at risk of becoming homeless with financial and/or other services.

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 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.**

In FY24 Bedford and Sudbury will continue administering rent relief programs, funded by their respective housing trusts, to assist low-income households with temporary monthly rental assistance in the form of a grant.

In FY24 the City of Framingham provides eligible homeless families, who were referred to Family Promise Metrowest, a rental assistance voucher. In exchange, Family Promise provides intensive case management. The Community Development Program coordinates with the Southern Middlesex Opportunity Council to refer clients for Residential Assistance for Families in Transition (RAFT). The program includes collaborations with the Metrowest Health Foundation, Framingham Community Partners, Metrowest Legal Services and Metrowest Mediation Services.

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

Needham's Community Housing Specialist responds to inquiries of near-homeless and homeless individuals and families by supplying 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.

In Waltham, \$200,000 in ARPA funding will go towards rental assistance and help low-income households avoid homelessness.

DRAFT

## **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. 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, Housing and Community Development 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 FY24 (FFY23) 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 spend time in FY24 delving deeper into critical challenges that an updated zoning ordinance could address. This includes how village centers and mixed-use areas can better accommodate: housing that is affordable at a range of price points, local businesses, environmental concerns, and a 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 address critical repairs for health and human safety more comprehensively. 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 offer “naturally affordable” small housing units for low- and moderate-income renters. This strategy is identified in the FY21-25 Consolidated Plan 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:

- On 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.

- 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 (FHC) 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 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 late FY23, the City executed a consulting contract with the Housing Discrimination Testing Program (HDTP) at Suffolk University Law School to conduct a two-year Fair Housing Testing Study throughout the 13 HOME Communities. Approximately ten tests will be conducted in each of the communities over the next two years to assess the level

of race (black) and voucher-based discrimination in the rental housing market. The Analysis of Impediments to Fair Housing Choice (2020-2021) (AI) identified Fair Housing testing as a strategic approach to uncovering discrimination in the private real estate market.

- The parking cost associated with development was also identified as a potential barrier to affordable housing in the Consortium's AI report. To determine the existence of this barrier, the Consortium partnered with MAPC to complete a parking utilization study of over 40 large multi-family, mixed-income and affordable developments built since 2000. MAPC's assesses whether parking requirements meet or exceed demand in new developments. The study, referred to as Phase IV of MAPC's Perfect Fit Parking Initiative, will culminate in a final memo to the Consortium and is expected to be complete in the Spring of 2023.

### *Consortium Communities*

The Town of Belmont 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 was approved by the Planning Board in April of 2022, 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 and Wayland completed their Housing Production Plans, and Sudbury will continue this effort into FY24. These plans 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. 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.

The Town of Brookline seeks to remove barriers to affordable housing through regulatory provisions and resource allocation:

- Brookline will continue to require, through its zoning bylaws, the provision of affordable housing from all new developments of four or more units. In FY21, the Town amended its inclusionary bylaw to lower the threshold of applicability from 6 to 4 units and revised the cash payment formula to ensure the amount of funding paid to the housing trust in lieu of on-site units reflect the current housing market. Further changes to the Inclusionary zoning bylaw in FY23 will expand the income levels served to 50 - 80% of area median income (AMI) for rental units and for 80 - 120% of AMI for homeownership units.
- Brookline Regulatory Planning Division is preparing a study on barriers to multifamily/mixed-use development targeted to a potential overlay district in Harvard Street. This study, along with compliance with the MBTA Communities regulation, will identify opportunities to lift barriers to mixed-use development in pivotal areas.
- Brookline is exploring a study to determine how financial contributions from developers may be used to offset the cost of an unmet need for affordable housing generated by commercial projects. The Town is in the process of establishing a working group, conducting a nexus study through a consultant, and then proceeding to the adoption of linkage fee by-law.
- Brookline continues to experience strong market demand for housing and consequent development proposals that utilize the comprehensive permitting process established by Massachusetts General Law, Chapter 40B. It is important for the Town to continue using the 40B mechanism to facilitate and expedite mixed-income housing proposals. Town departments will continue to provide organized input and administration when these proposals occur, with the intent to produce housing that effectively meets the needs of all Town residents and remains permanently affordable.
- The Town will continue to support the Brookline Housing Authority. This support includes addressing capital needs and partnering on redevelopment opportunities where the BHA can modernize and/or increase the Town's supply of affordable housing units. In FY24, Brookline will continue to work with the BHA on its multi-year Strategic Preservation Initiative. This project will take advantage of HUD's Rental Assistance Demonstration Program (RAD) as well as federal and state tax credits and state and local subsidies to rehabilitate and preserve nearly 500 units of affordable public housing in six different properties.

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). As a result, the department anticipates forming partnerships that will leverage HOME, CDBG, CPA and other funding to expand community affordable housing development.

Natick is active in addressing issues of affordable housing and fair housing in the Town. *Natick 2030+ Comprehensive Plan* calls for 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: The Natick Planning Board is currently reviewing the Inclusionary Zoning bylaw as part of a comprehensive update to its cluster housing bylaw.
- Natick Affordable Housing Trust (AHT) Strategic Plan: In FY22, the Natick AHT partnered with JM Goldson to develop a strategic plan. The strategic plan, which is expected to be complete in FY23, will provide direction to the Natick AHT in their work to maintain and provide new housing, including the provision of resources.
- 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 working with the Government Alliance for Racial Equity (GARE). This yearlong process will conclude with an action plan with recommendations to respond to 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: In FY23, the Natick Zoning Board of Appeals (ZBA) approved the 40B application for the former Saint Patrick School, located at 45 East Central Street. The project includes 53 residential units, of which 14 will be affordable.
- Community Preservation Act (CPA): In 2022, Natick voted to adopt the provisions of the Community Preservation Act (CPA). The Town will be developing policies for the implementation of the CPA program.

Although Needham is over the 10 percent 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. An abutter filed an appeal of the ZBA's comprehensive permit approval, and litigation was only recently resolved with the units now eligible to be restored to the SHI. Needham is also negotiating with developers on the inclusion of affordable units or funding in-lieu of the units as part of a couple new private developments.

As noted earlier, Needham recently completed a Housing Production Plan in FY23. The Plan identifies challenges to produce affordable housing in Needham and provides recommendations for creating greater housing diversity and affordability through measures related to zoning, financing, permitting, and Town oversight. The Housing Plan includes 17 major recommendations as well as eight additional strategies for further study.

Waltham is beginning the process of updating the City's Master Plan. As part of this effort, the City conducted seven City Council special committee public input meetings in each of the City's

Wards to solicit input on community development goals, including housing creation and barriers to affordable housing. In addition, targeted Master Plan input sessions were held with city departments, Waltham senior citizens, local veterans, and social service organizations. Input meetings will continue in early 2023 with the Waltham business community, boards and commissions, and schools. The goal of the updated master plan is to identify and address barriers to affordable housing in addition to recommending best practice land use, tax policies, zoning ordinances, building codes, and other community development topics.

The five-year housing plan approved by the Watertown City Council in March 2021 recommended that the City continue to consider changing zoning that might serve as a barrier to affordable housing. In the last five years, Watertown created new opportunities for mixed use development along two major corridors and substantially reduced parking requirements for multi-family projects. The new plan includes a recommendation for Watertown to consider developer incentives that create units with lower rents and encourage more development near high-frequency bus lines and local retail employment. The plan also prioritized the creation of an accessory dwelling unit (ADU) ordinance. During 2022, the Watertown Housing Partnership worked on language to allow ADUs by right in single and two-family structures. The new Affordable Housing Trust will likely revisit this discussion in FY24.

## **AP-85 Other Actions**

### **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.

Brookline will continue to require the provision of affordable housing from all new developments of four or more units; support the Brookline Housing Authority; and expedite permitting of mixed-income housing through the comprehensive permitting process.

The Town of Needham recently completed a Housing Production Plan that recommends actions to preserve existing affordable housing, including but not limited to the Needham Housing Authority's Preservation and Redevelopment Initiative (PRI); plans for the redevelopment of the Stephen Palmer municipal property; and additional efforts to better control teardown activity.

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 state, CDBG, and HOME funds, the City and the WHA can 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 production and preservation of affordable housing including: a comprehensive review of the Town's zoning bylaw to comply with the recommendations included in Natick's Comprehensive and Housing Production Plans; planning for the two Natick Commuter Rail Stations; and the development of a strategic plan for the Natick Housing Trust.

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 recently approved an updated Housing Production Plan in February 2023.

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 can make substantial improvements to Housing Authority units with an emphasis on improving ADA accessibility.

### **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 the prior year's data. The following is a breakdown of individuals living below the poverty level by age group and the 2021 and 2023 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>2022</b>	<b>2023</b>
<b>1</b>	\$13,590	\$14,580
<b>2</b>	\$18,310	\$19,720
<b>3</b>	\$23,030	\$24,860
<b>4</b>	\$27,750	\$30,000
<b>5</b>	\$32,470	\$35,140
<b>6</b>	\$37,190	\$40,280
<b>7</b>	\$41,910	\$45,420
<b>8</b>	\$46,630	\$50,560
<b>For each additional person, add</b>	\$4,720	\$5,140

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 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, Needham Sudbury and Wayland, the housing authorities are the primary resource for assisting poverty-level households.

In FY24 Bedford and Sudbury will continue to administer rent relief programs to assist low-income households to maintain housing through economically uncertain times.

Brookline strives to consistently offer programs through municipal agencies that help families to improve their housing situation and standard of living. The Town also partners with nonprofits to provide social service programs to a diverse, changing, and ever-increasing population. As many low-income households fell into poverty through job loss due to the pandemic, the Town shifted support to the Brookline Safety Net, which provides up to \$3,000 in emergency assistance for housing costs, utilities, food, or other essential household expenses.

The Town of Natick annually appropriates \$80,000 in local revenues to the Natick Affordable Housing Trust for developing and preserving affordable housing for low-income households in the Town.

The Needham Housing Authority is the largest provider of low-income affordable housing in the Town of Needham, providing almost half of the 754 affordable SHI housing units in Needham. The Town continues to support NHA's efforts to address problems associated with its existing developments due to antiquated and inaccessible design issues and potential construction deficiencies.

Waltham will continue to award federal funds to social service agencies that are providing ESL 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. Waltham will also offer emergency rental assistance in FY24 with \$200,000 in City ARPA funds. In addition, Waltham assists the food pantry organization, Healthy Waltham, by supplying the centrally located government center building as a host site for food

distribution events. The City also provides food storage for Healthy Waltham in a surplus public building.

#### **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 FY24 (FFY23).

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 can 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 enforced by the Brookline's Health Department through the Division of Environmental Health. The Health Department is tasked with the enforcement of regulations and requirements for lead removal, abatement and containment as they are treated as public health hazards. Construction contractors are required to comply with the State's requirements of safe practices for renovation, rehabilitation, and lead abatement. The Town refers property owners and renters in need of lead abatement to State agencies in charge of administering lead abatement programs such as the Get the Lead Out Program. Those referrals are coordinated with the agency 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 required to disclose and mitigate the presence of toxic substances such as lead and/or asbestos, and in most cases, HUD requires a mitigation plan if the proposed activity poses a risk for humans.

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.

The Waltham Housing Division 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**

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 across public, private, and nonprofit sectors. It generates networks, coalitions, and partnerships that serve as platforms for continued dialogue on community improvements.

Needham's newly updated Housing Plan issues recommendations for building local and regional support and collaboration on housing, including expanding the membership and role of the Affordable Housing Trust.

In April 2022, the Waltham Housing Division onboarded a housing specialist to help manage the Tenant Based Rental Assistance and housing rehabilitation program. To achieve seamless management of community development programs, the City will be combining the Housing Division and Planning Departments into the Department of Housing and Community Development. CDBG, HOME, and construction project management will be conducted within this new larger department, while the revised 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. The 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.

DRAFT

## 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 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 identified 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 consult 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 FY24 (FFY23) 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 not to allocate ESG funding for street outreach or HMIS. This decision was based on ESG providers' identification of other, existing resources for serving unsheltered homeless individuals and families. 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 done 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 FY24 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 FY21, FY22, and FY23, 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 training for providers to enhance their knowledge and understanding of the HMIS system.

DRAFT

# APPENDIX

# CITIZEN PARTICIPATION PLAN

## CITY OF NEWTON HOUSING AND COMMUNITY DEVELOPMENT PROGRAM

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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 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 a newspaper with regional circulation the 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 a newspaper of regional circulation 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**

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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 a newspaper with regional circulation at least ten days prior to each hearing.

Public notices for substantial changes will be advertised 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 a newspaper with regional circulation 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:

<b>TYPE OF PUBLIC HEARING</b>	<b>COMMENT PERIOD</b>
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:

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

## **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.

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.

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## 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 2022 Income Limits</b>	
<b>Household Size</b>	<b>30% Extremely-Low Income Limits</b>
<b>1</b>	\$29,450
<b>2</b>	\$33,650
<b>3</b>	\$37,850
<b>4</b>	\$42,050
<b>5</b>	\$45,450
<b>6</b>	\$48,800
<b>7</b>	\$52,150
<b>8 or more</b>	\$55,550

Effective April 1, 2022

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

**Newton Community Development Block Grant Program - FY24 Budget**

PROJECT #	IDIS #	Env. Review	Key Org	Obj Code	Projects	Letter-of-Credit (LOC) Budget	FY24 Program Income (Estimated)	Prior Year(s) Program Income (FY23)	Total Budget
<b>HOUSING PROGRAM</b>									
CD24-01A		Exempt	15002024	Various	Housing Program Delivery	\$277,965.00			\$277,965.00
CD24-01B		project by project	15002024	579600	Housing Rehabilitation and Development Program Fund	\$617,725.00			\$617,725.00
CD24-01C		project by project	15002024	579600	West Newton Armory Affordable Housing Development	\$230,000.00			\$230,000.00
CD24-01D		project by project	15002024	579601	Housing Program Income Pool (estimated rehab loan repayments)		\$132,000.00		\$132,000.00
<b>HOUSING PROGRAM TOTAL</b>						<b>\$1,125,690.00</b>	<b>\$132,000.00</b>	<b>\$0.00</b>	<b>\$1,257,690.00</b>
<b>ARCHITECTURAL ACCESS</b>									
CD24-03A		project by project	15002024	586001	City Hall Campus Exterior Pedestrian Access Improvements	\$42,000.00			\$42,000.00
CD24-03B		project by project	15002024	586001	FY24 Architectural Access Project	\$48,210.00			\$48,210.00
<b>ARCHITECTURAL ACCESS TOTAL</b>						<b>\$90,210.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$90,210.00</b>
<b>HUMAN SERVICES</b>									
CD24-05A		Exempt	15002024	579700	The Carroll Center for the Blind / Career and Vocational Rehab Services	\$ 13,000.00			\$13,000.00
CD24-05B		Exempt	15002024	579700	Boys & Girls Club of Newton / Financial Aid for Teens and Families	\$ 24,900.00			\$24,900.00
CD24-05C		Exempt	15002024	579700	West Suburban YMCA / Childcare Financial Aid Program	\$ 24,900.00			\$24,900.00
CD24-05D		Exempt	15002024	579700	Family ACCESS of Newton / Sustaining access to childcare for low-income families	\$ 15,000.00			\$15,000.00
CD24-05E		Exempt	15002024	579700	Jewish Big Brothers & Big Sisters / Mentoring Initiatives	\$ 10,000.00			\$10,000.00
CD24-05F		Exempt	15002024	579700	2Life Communities / Caring Choices and Wellness Nursing for Low-Income Seniors	\$ 15,000.00			\$15,000.00
CD24-05G		Exempt	15002024	579700	Jewish Family & Children's Service/ Stabilization & Recovery Services	\$ 15,300.00			\$15,300.00
CD24-05H		Exempt	15002024	579700	Newton Community Development Foundation / Resident Services Program	\$ 35,000.00			\$35,000.00
CD24-05I		Exempt	15002024	579700	Newton Housing Authority / Resident Services Program	\$ 35,000.00			\$35,000.00
CD24-05J		Exempt	15002024	579700	Plowshares Education Development Center / Tuition Assistance for Childcare	\$ 11,000.00			\$11,000.00
CD24-05K		Exempt	15002024	579700	Pathway to Possible / Clinical Social Worker	\$ 10,000.00			\$10,000.00
CD24-05L		Exempt	15002024	579700	Horace Cousens Industrial Fund / Emergency Payment for Families in Financial Crisis	\$ 24,900.00			\$24,900.00
CD24-05M		Exempt	15002024	579700	The Second Step /Community Programs for Survivors of Domestic Violence	\$ 4,943.00		\$30,057	\$35,000.00
CD24-05N		Exempt	15002024	579700	Dept. of Parks & Rec. / Financial Aid for Youth Summer Camp	\$ 14,900.00			\$14,900.00
CD24-05O		Exempt	15002024	579700	Riverside Community Care/Mental Health Services Promoting Health, Well-Being, and Self-Sufficiency	\$ 21,700.00			\$21,700.00
CD24-98D		Exempt	15002024	579700	Human Service Program Income Reserve**** (for FY25 projects- do not include in FY24 budget totals)		\$30,000		\$30,000.00
<b>HUMAN SERVICES TOTAL</b> (Cannot exceed 15% of current year LOC + 15% of prior year program income)						<b>\$275,543.00</b>	<b>\$30,000.00</b>	<b>\$30,057.00</b>	<b>\$305,600.00</b>
<b>PROGRAM ADMINISTRATION</b>									
CD24-09A		Exempt	15002024	Various	Program Administration	\$371,860.00	\$40,000.00		\$411,860.00
CD24-09B		Exempt	15002024	Various	Citizen Participation	\$1,000.00			\$1,000.00
CD24-99		Exempt	15002024	579700	Contingencies				\$0.00
<b>PROGM ADMIN TOTAL</b> (Cannot exceed 20% of current year LOC + 20% of current year program income- must also include Planning activities)						<b>\$372,860.00</b>	<b>\$40,000.00</b>	<b>\$0.00</b>	<b>\$412,860.00</b>
<b>GRAND TOTAL ALL PROGRAM AREAS</b>						<b>\$1,864,303.00</b>	<b>\$202,000.00</b>	<b>\$30,057.00</b>	<b>\$2,066,360.00</b>
<b>FY24 CDBG Letter of Credit Funds from HUD B-23-MC-25-0019</b>						<b>\$1,864,303.00</b>			

\* FY24 CDBG allocation was a .326% decrease from FY23

\*\*\*\* FY24 Program Income for Human Services is not included in total as it is reserved for FY25 programs

**Newton Emergency Solutions Grants Program - FY24 Budget**

Project Number	Env. Review	IDIS #	ESG PROJECTS	KEY ORG	OBJ CODE	ACCOUNT TITLE	FY23 ESG Funds
ES23-01C	Exempt		Integrated Day and Seasonal Night Programs -- Community Day Center of Waltham	21012024	579700	Grants	\$ 43,180.00
ES23-01D	Exempt		Shelter Operations -- REACH	21012024	579700	Grants	\$ 25,060.00
ES23-01B	Exempt		Residential Shelter Program --The Second Step	21012024	579700	Grants	\$ 30,070.00
ES23-02A	Exempt		Homelessness Prevention -- Brookline Community Mental Health Center	21012024	579700	Grants	\$ 27,290.00
ES23-03A	Exempt		Rapid Re-housing -- Brookline Community Mental Health Center	21012024	579700	Grants	\$ 26,460.00
ES24-05A	Exempt		ESG Administration	21012024	579700	Grants	\$ 12,328.00
							<b>\$ 164,388.00</b>
<b>FY24 ESG Letter of Credit Funds E-23-MC-25-0019</b>							

\* FY24 ESG was a .4065% decrease in funding from FY23

**WestMetro HOME Partnerships Program FY24 Projects**

Project #	PROJECT NAME/TYPE	FY24 Budget	Prior Yr(s) Program Income	Uncommitted Prior Yr(s) Funds	Anticipated FY24 Program Income	Totals
<b>BEDFORD</b>						
HM24-01A/HM23-01A	Bedford HOME Administration	\$ 1,322.00		\$ 1,700.00		\$ 3,022.00
	HM24-99* Fair Housing Testing Program	\$ 418.00				\$ 418.00
HM24-01B/HM23-01B/HM22-01B	Bedford TBRA	\$ 17,400.00		\$ 26,813.00		\$ 44,213.00
	<b>TOTAL</b>	<b>\$ 19,140.00</b>	<b>\$ -</b>	<b>\$ 28,513.00</b>	<b>\$ -</b>	<b>\$ 47,653.00</b>
<b>BELMONT</b>						
HM23-02A/HM21-02A	Belmont HOME Administration	\$ 4,127.00		\$ 5,320.00		\$ 9,447.00
	HM24-99* Fair Housing Testing Program	\$ 1,303.00				\$ 1,303.00
HM24-02B	Sherman Gardens	\$ 54,310.00				\$ 54,310.00
HM23-02B/HM22-02B	Belmont Projects / Programs			\$ 102,160.00		\$ 102,160.00
	<b>TOTAL</b>	<b>\$ 59,740.00</b>	<b>\$ -</b>	<b>\$ 107,480.00</b>	<b>\$ -</b>	<b>\$ 65,060.00</b>
<b>BROOKLINE</b>						
HM24-03A	Brookline HOME Administration	\$ 18,111.00				\$ 18,111.00
	HM24-99* Fair Housing Testing Program	\$ 5,364.00				\$ 5,364.00
HM24-03C	Hebrew SeniorLife 108 Centre Street	\$ 234,740.00				\$ 234,740.00
	<b>TOTAL</b>	<b>\$ 258,215.00</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 258,215.00</b>
<b>CONCORD</b>						
HM24-13A/HM23-13A	Concord HOME Administration	\$ 2,358.00		\$ 3,040.00		\$ 5,398.00
	HM24-99* Fair Housing Testing Program	\$ 744.00				\$ 744.00
HM24-13B	WestMetro HOME Consolidated Pool	\$ 31,025.00				\$ 31,025.00
	<b>TOTAL</b>	<b>\$ 34,127.00</b>	<b>\$ -</b>	<b>\$ 3,040.00</b>	<b>\$ -</b>	<b>\$ 37,167.00</b>
<b>FRAMINGHAM</b>						
HM24-09A	Framingham HOME Administration	\$ 19,646.00				\$ 19,646.00
	HM24-99* Fair Housing Testing Program	\$ 6,204.00				\$ 6,204.00
HM24-09C/HM23-09C/HM22-09C	Framingham TBRA Program	\$ 258,500.00		\$ 183,411.86		\$ 441,911.86
HM24-09P/HM23-09P/HM22-09P	Framingham Program Income- reserved for TBRA		\$ 12,390.02		\$ 2,000.00	\$ 14,390.02
HM23-09D/HM22-09D/HM21-09D/HM20-09F	Framingham Carlson Crossing East			\$ 257,426.17		\$ 257,426.17
	<b>TOTAL</b>	<b>\$ 284,350.00</b>	<b>\$ 12,390.02</b>	<b>\$ 440,838.03</b>	<b>\$ 2,000.00</b>	<b>\$ 739,578.05</b>
<b>LEXINGTON</b>						
HM24-12A/HM23-12A	Lexington HOME Administration	\$ 2,497.00		\$ 3,215.00		\$ 5,712.00
	HM24-99* Fair Housing Testing Program	\$ 788.00				\$ 788.00
HM24-12B/HM23-12B/HM22-12B	Lexington Housing Authority - Vynebrook	\$ 32,850.00		\$ 61,820.00		\$ 94,670.00
	<b>TOTAL</b>	<b>\$ 36,135.00</b>	<b>\$ -</b>	<b>\$ 65,035.00</b>	<b>\$ -</b>	<b>\$ 101,170.00</b>
<b>NATICK</b>						
HM24-11A/HM23-11A	Natick HOME Administration	\$ 3,709.00		\$ 4,780.00		\$ 8,489.00
	HM24-99* Fair Housing Testing Program	\$ 1,171.00				\$ 1,171.00
HM24-11B/HM23-11B/HM20-11B	Natick TBRA Program	\$ 48,820.00		\$ 55,465.00		\$ 104,285.00
HM21-11P	Natick Program Income		\$ 10,000.00			\$ 10,000.00
	<b>TOTAL</b>	<b>\$ 53,700.00</b>	<b>\$ 10,000.00</b>	<b>\$ 60,245.00</b>	<b>\$ -</b>	<b>\$ 123,945.00</b>
<b>NEEDHAM</b>						
HM24-05A/HM23-05A	Needham HOME Administration	\$ 2,335.00		\$ 3,010.00		\$ 5,345.00
	HM24-99* Fair Housing Testing Program	\$ 738.00				\$ 738.00
HM24-05B/HM23-05B	Needham Projects / Programs	\$ 30,725.00		\$ 30,090.00		\$ 60,815.00
	<b>TOTAL</b>	<b>\$ 33,798.00</b>	<b>\$ -</b>	<b>\$ 33,100.00</b>	<b>\$ -</b>	<b>\$ 66,898.00</b>
<b>NEWTON</b>						
HM24-06A	Newton HOME Administration	\$ 10,033.35				\$ 10,033.35
	HM24-99* Fair Housing Testing Program	\$ 3,169.00				\$ 3,169.00
HM24-06B/HM23-06B	Newton West Armory Affordable Housing Dev	\$ 132,023.50				\$ 132,023.50
HM23-06B	Newton Projects/Programs			\$ 129,286.60		\$ 129,286.60
	<b>TOTAL</b>	<b>\$ 145,225.85</b>	<b>\$ -</b>	<b>\$ 129,286.60</b>	<b>\$ -</b>	<b>\$ 274,512.45</b>
<b>SUDBURY</b>						
HM24-10A/HM23-10A	Sudbury HOME Administration	\$ 631.00		\$ 810.00		\$ 1,441.00
	HM24-99* Fair Housing Testing Program	\$ 199.00				\$ 199.00
HM24-10B/HM23-10B	Sudbury Projects / Programs	\$ 8,290.00		\$ 8,110.00		\$ 16,400.00
	<b>TOTAL</b>	<b>\$ 9,120.00</b>	<b>\$ -</b>	<b>\$ 8,920.00</b>	<b>\$ -</b>	<b>\$ 18,040.00</b>
<b>WALTHAM</b>						
HM24-07A	Waltham HOME Administration	\$ 14,925.00				\$ 14,925.00
	HM24-99* Fair Housing Testing Program	\$ 4,713.00				\$ 4,713.00
HM24-07B/HM23-07B/HM22-07B	Waltham TBRA Program	\$ 196,380.00		\$ 272,882.04		\$ 469,262.04
HM22-07C/HM21-07C	Waltham Beaverbrook Apts		\$ 319,578.00	\$ 80,422.00		\$ 400,000.00
HM24-7P/HM23-7P	Waltham Program Income - reserved for TBRA		\$ 25,000.00		\$ 10,000.00	\$ 35,000.00
	<b>TOTAL</b>	<b>\$ 216,018.00</b>	<b>\$ 344,578.00</b>	<b>\$ 353,304.04</b>	<b>\$ 10,000.00</b>	<b>\$ 923,900.04</b>
<b>WATERTOWN</b>						
HM24-08A	Watertown HOME Administration	\$ 7,780.00				\$ 7,780.00
	HM24-99* Fair Housing Testing Program	\$ 2,457.00				\$ 2,457.00
HM24-08B/HM23-08B	Watertown Projects / Programs	\$ 102,375.00		\$ 100,250.00		\$ 202,625.00
HM22-08P	Watertown Program Income		\$ 119,155.50			\$ 119,155.50
	<b>TOTAL</b>	<b>\$ 112,612.00</b>	<b>\$ 119,155.50</b>	<b>\$ 100,250.00</b>	<b>\$ -</b>	<b>\$ 332,017.50</b>
<b>WAYLAND</b>						
HM24-14A/HM23-14A	Wayland HOME Administration	\$ 714.00		\$ 920.00		\$ 1,634.00
	HM24-99* Fair Housing Testing Program	\$ 226.00				\$ 226.00
HM24-14B/HM23-14B	Wayland TBRA Program	\$ 9,385.00		\$ 9,190.00		\$ 18,575.00
HM22-14C	Wayland 12 Hammond Way			\$ 50,000.00		\$ 50,000.00
	<b>TOTAL</b>	<b>\$ 10,325.00</b>	<b>\$ -</b>	<b>\$ 60,110.00</b>	<b>\$ -</b>	<b>\$ 70,435.00</b>
<b>CONSORTIUM ADMINISTRATION</b>						
HM24-99	Consortium HOME Administration	\$ 48,228.14				\$ 48,228.14
	HM24-99* Fair Housing Testing Program	\$ 1,350.01				\$ 1,350.01
HM24-15A/HM23-15A/HM22-15A/HM19-15A	Competitive Funding Pool	\$ -		\$ 465,955.10		\$ 465,955.10
HM24-15B	CHDO Operating Expenses Funding Pool	\$ 82,630.25				\$ 82,630.25
HM23-15B1	CHDO Operating Expenses- MetroWest CD			\$ 50,000.00		\$ 50,000.00
HM24-15C	CHDO Set Aside Funding Pool	\$ 247,890.75				\$ 247,890.75
HM23-15C	CHDO Set Aside- MetroWest CD: West Newton Armory			\$ 242,750.70		\$ 242,750.70
	<b>TOTAL</b>	<b>\$ 380,099.15</b>	<b>\$ -</b>	<b>\$ 758,705.80</b>	<b>\$ -</b>	<b>\$ 1,138,804.95</b>

\*HM24-99 Consortium members agreed to contribute up to 25% of their HM24 admin. to the Consortium's Fair Housing Testing Program. Actual figures show each community contributing approximately 24% of HM24 admin. to this program.

**TOTAL FY24 HOME CONSORTIUM BUDGET \$ 1,652,605.00 \$ 486,123.52 \$ 2,148,827.47 \$ 12,000.00 \$ 4,197,395.99**  
**HOME Consortium Letter of Credit Funds M22-DC25-0213 \$ 1,652,605.00**  
 FY24 HOME is a 2.117% increase from FY23