

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The City was successful in carrying out its Action Plan, based upon the goals set forth in the Consolidated Plan. Highlights of this program year include:

ECONOMIC DEVELOPMENT Small Business Technical Assistance Program (\$23,253) At New Vue Communities, funds continued to be used to provide outreach and technical assistance to businesses. This program leverages loans for small businesses. 45 Jobs were created/retained, 39 businesses counseled, 21 business plans developed and 1 loan leveraged. Funds were used to pay staff salary. The benefit of this project is the promotion of economic development and job creation/job retention assisting new and existing businesses.

Downtown Coordinator (\$32,554) Fitchburg State University used funds to pay part of the salary of the Downtown Coordinator to assist in planning and coordinating Main Street Activities, special events, fundraising initiatives, volunteer management, and recruitment with downtown businesses all for the benefit of micro-enterprises. This work supports Fitchburg's efforts as an "Arts, Culture & Recreation destination and Fitchburg as a "College Town" to compliment the revitalization efforts already underway downtown and within the city. The Coordinator was able to assist 53 Microenterprise businesses throughout the year.

Small Business Financial Assistance (\$51,156) The City assisted 9 businesses during the program year through business loans with favorable terms or grants. Two of those businesses qualified as a microenterprise (IDIS 996, 995), many creating or retaining their own jobs (IDIS: 913, 971, 954, 997, 998 965). Of the microenterprise businesses assisted that gave their demographics, we were able to obtain the race of 11 white individuals of which 4 were of Hispanic ethnicity. 9 of those were of moderate income and 1 of low income. As we move toward closing those projects, we hope to have more demographics available.

In addition to the businesses above, the City has been working with a non-profit business for some time seeking to open a subsidized working artist/artisan shared work and retail space. The business group was absorbed by the Fitchburg Cultural Alliance. The City and FCA agreed to extend funding of staffing of the studio spaces with business assistance funds (\$60,000) completing the project in May 2023 and was able to assist at least 9 microenterprise businesses throughout the course of the year.

REHAB AND PRESERVATION Code Enforcement (\$96,224): Inspections were conducted on a total of 131 units and 559 dwellings, during the plan year. 9 vacant and accessible buildings were boarded and secured under the orders of the target area inspector. Tickets, fines and court action have been issued to violators for various Sanitary and Building Code violations with efforts geared toward ridding target neighborhoods of conditions of blight and to promote proper and supervised repair to buildings. The City's large percentage of older housing stock continues to present the need for this code enforcement activity.

HOUSING Critical Home Repair (\$18,602) Habitat for Humanity used CDBG Funding for repairs that included: replacing drafty and inefficient windows, repairing stone foundation to make a home structurally safe, and lastly rebuilding a porch including a section of roof and stairs.

HOME OWNER REPAIR- CITY OF FITCHBURG: HOME program funds (\$162,130 committed) CDBG revolving funds (\$66,352 committed) During the program year, 3 homeowner repair projects were initiated, and 2 continued from the previous year. 4 utilizing HOME and 2 using revolving CDBG funds. The beneficiaries include a single mom with 2 children (969) who has an elder couple tenant (970), an elderly head of household of five, (964), a single mother with 4 children, (957), and a 2 parent household of 5, (960), with an rental apartment housing a single elder tenant, an elder couple (994) and a single elder (999). All projects are continuing into the next program year, except (994) which was completed in April 2023. We anticipate the remaining projects will be completed and closed out by mid-fall 2023. This program has experienced some challenges in its work, with the high cost of construction impacting our ability to continue this program. Additionally, the department has experienced multiple staff changes during the program year adding to delays.

RENTAL DEVELOPMENT: During the program year, construction completed for the rental project, Moran Square Redevelopment, (958), 44 units, of which 5 are HOME units, completed in June 2023, the majority of the apartments are now occupied, including all HOME funded units. Unfortunately, this project was not able to be closed until after the completion of the program year. In addition, the City of Fitchburg worked with New Vue Communities to close on the financing for their 68 unit, artist preference housing rental project in June 2023. The project was set up in IDIS, (1028), after the program year ended.

PUBLIC SERVICES Family Homeless Shelter (\$9,290) This program is run through North Star Family Services. NSFS is an emergency shelter which provides case management services to homeless families, which includes assistance with employment, finances, medical issues, and securing permanent housing. 4 of the families served, left the program successfully for permanent housing throughout the course of the year. All families are required to work each day towards self-sufficiency. The year ended with one extremely low income Fitchburg household with an ongoing need for assistance.

Drug Enforcement and Foot Patrol (\$60,385) The Fitchburg Police Department, used their overtime hours for drug enforcement work, executed 53 search warrants, made 47 arrests and 16 criminal complaints were taken out by FPD DSU and NWDCDTF for 94C violations. The department seized: \$252,642 in US currency, 11,847.75 grams cocaine, 1,469.8 grams of heroin, 3,193.17 Grams Fentanyl, 6,590.26 grams of Methamphetamine, 46.32 grams ecstacy, 357.2 ounces of Marijuana, 2 grams hashish, 25 suboxone strips, 3011 pills of Gabapentin, 803 misc. pills (Xanax, Trazadone, Clonidine, Oxycodone, Clonazepam, etc), 14 firewarms, 656 rounds of ammunition, and 3 motor vehicles.

The officers assigned to walking patrols spent time in areas frequented by foot traffic. Officers followed up with complainants regarding loitering near the library and near the banks and spent additional time in those areas moving along loiterers. Officers spent time near City Hall and assisted patrons using the crosswalks. Officers noted that drivers rarely stop for pedestrians crossing the street and made sure patrons made it to their destinations safely. Officers engaged with residents, patrons and business owners in the downtown area. Lastly, officers moved along loiterers and vagrants from Riverfront park and checked known offenders for active warrants.

Board of Health Street Outreach (\$26,012) Through this innovative program the Street outreach workers engaged homeless individuals living in inhabitable places on 6930 occasions in the City of Fitchburg supplying necessary health, hygiene, and safety items as deemed appropriate by the outreach workers including referrals to medical/mental health/substance use treatment, shelter, etc.

Homelessness Prevention (\$10,219) Community Legal Aid assisted 20 residents who were in the process of being evicted or denied Fitchburg Housing Authority Housing units due to CORI issues. The majority of clients served were receiving public rent assistance or had applied for assistance. All clients were income eligible.

Fitchburg Farmers Market (\$7,327) Growing Places used the funds to hold a Farmers Market throughout the year, serving 1150 households. Over 25 local vendors participated throughout the summer season. Customers used SNAP/HIP, Senior/WIC Farmers Market Coupons, and cash/credit as forms of payment at the market. Through this program they were able to provide equitable access to local, culturally appropriate food and education to significant, low-income, minority, and special needs populations including homeless, disabled, elderly, and youth at risk.

PUBLIC FACILITIES for parks and playgrounds, final design for the pathway along Memorial Middle School on Causeway Street was completed with input from the Recreation Director. Plans were presented to the Board of Park Commissioners. The project is currently out to bid with a bid open scheduled for July 13, 2023 of the coming program year.

Work on Boutelle street included 8 ADA ramps and 2 Rectangular Rapid-Flashing Beacon pedestals were installed. RRFBs will be installed next year in coordination with a Safe Streets and Spaces grant. On Wallace Ave and Elm Street, 245 linear feet of Sidewalk removed, replacement and curb cuts will be installed next grant year. Of the Snow and Day Street improvements, 4 ADA ramps were put in on Snow St

as the Day St improvements occurred with the previous Fiscal Year. South Street sidewalk accessibility improvements included 4 handicapped ramps, 350 linear feet of sidewalk. South Street total quantities should be closer to 600 LF and 8 ADA Ramps overall.

The Parkhill DPW project this year included 2 curbcuts, a 200 linear foot walkway, and the courts and BMX Park was milled and paved.

Summer Street Art Improvements (\$4,651) (IDIS 972) During the program year, the City worked with North Central Massachusetts Association of Realtors who had struggled with graffiti on their retaining wall at 40 Summer St in Fitchburg. The organization hated to have that as one of the last things people see when leaving the City. The group worked with a local artist to install a mural on the wall with 4 historical figures from the City of Fitchburg. The organization no longer has any issues with graffiti on the wall and it now serves as a positive representation of Fitchburg's diverse history!

Friends of the Abolitionist Park (\$4,651) began Phase III of their improvements to the park which this year included the Request for Proposals that was posted in April. Artist Eugene Finney was also hired to prepare (and later install) the six panels, which would eventually hold the mural. The committee reviewed several proposals in May, then selected a muralist in June; work on the mural commenced in July. The committee selected artist Digi Chivetta (aka Devin Cole), who began painting in July and completed the mural in early October. The committee selected Digi's proposal (and mural) which included imagery from local and national history, as well as poetry, representation of feelings of both sadness and joy, and Yoruba cultural imagery, reflecting that freedom and humanity existed prior, during and after slavery. Digi was assisted by local artists Shara Osgood and William Thompson.

On October 15th the FFAP organized a mural unveiling and community celebration where more than 100 supporters attended, including dozens of neighborhood residents. The event featured muralist Digi Chivetta and was staffed by Mount Wachusett Community College students.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Acq./Dev/Rehab by Non-profit Housing Providers	Affordable Housing	HOME: \$	Rental units constructed	Household Housing Unit	20	2	10.00%	10	0	0.00%
Acq./Dev/Rehab by Non-profit Housing Providers	Affordable Housing	HOME: \$	Rental units rehabilitated	Household Housing Unit	0	4		5	0	0.00%
Acq./Dev/Rehab by Non-profit Housing Providers	Affordable Housing	HOME: \$	Homeowner Housing Added	Household Housing Unit	0	4		2	0	0.00%
CDBG Administration	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Other	Other	1	1	100.00%	1	1	100.00%

Clearance Activity	Non-Housing Community Development	CDBG: \$	Buildings Demolished	Buildings	20	0	0.00%			
Economic Development	Non-Housing Community Development	CDBG: \$	Facade treatment/business building rehabilitation	Business	0	0		5	1	20.00%
Economic Development	Non-Housing Community Development	CDBG: \$	Businesses assisted	Businesses Assisted	50	151	302.00%	50	101	202.00%
HOME Administration	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	HOME: \$	Other	Other	1	1	100.00%	1	1	100.00%
Housing Program Delivery	Affordable Housing	CDBG: \$	Other	Other	1	1	100.00%			
Public Facility Improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	84500	40550	47.99%	16900	40550	239.94%

Public Facility Improvements	Non-Housing Community Development	CDBG: \$	Facade treatment/business building rehabilitation	Business	0	0		0	0	
Public Facility Improvements	Non-Housing Community Development	CDBG: \$	Businesses assisted	Businesses Assisted	0	1		0	1	
Public Services	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	18400	46538	252.92%	3680	46538	1,264.62%
Public Services	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	16	220	1,375.00%	15	18	120.00%
Public Services	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0		0	0	

Public Services	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Homelessness Prevention	Persons Assisted	50	35	70.00%	10	20	200.00%
Rehabilitation and Preservation	Affordable Housing	CDBG: \$ / HOME: \$	Rental units rehabilitated	Household Housing Unit	6	0	0.00%	5	0	0.00%
Rehabilitation and Preservation	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	60	8	13.33%	15	4	26.67%
Rehabilitation and Preservation	Affordable Housing	CDBG: \$ / HOME: \$	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	1000	8900	890.00%	200	1027	513.50%
Rehabilitation and/or Acquisition	Affordable Housing	HOME: \$	Direct Financial Assistance to Homebuyers	Households Assisted	10	3	30.00%	4	0	0.00%
Rental Development by For-profit Developers	Affordable Housing	CDBG: \$ / HOME: \$	Rental units constructed	Household Housing Unit	8	0	0.00%			

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

The Priority of addressing the issue of homelessness is demonstrated by the jurisdiction's use of funds in Year 48. Citing tables 1 and 2 above, funding provided to the North Star Family Services family shelter gave Fitchburg families access to emergency shelter - the only family shelter in this immediate area and the Heath Departments Street Outreach services work with homeless individual to connect them to resources and services as they are willing to take them. Community Legal Aid assists income eligible renters with wrongful evictions to help families to remain in their homes. In addition, the YMCA Spartacus is dedicated to youth, with the goal of providing guidance and skill which will lead to productive lives and lessen the chance of poverty and homelessness. The Boys and Girls club similarly has a focus on youth empowerment with which the city provides transportation to their programs. The Fitchburg Farmers' Market provided by Growing Places increased access to local, affordable produce, goods, and services to low and moderate income families with the ability to accept SNAP/HIP at all produce vendors at the market as well as providing hands-on youth activities to attract families to accessible nutrition education residents might not be familiar with. These activities all made significant progress towards meeting the specific goals set forth in the plan. The rehabilitation of affordable rental/housing units, as well as homeowner incentives, also reduces the level of homelessness by providing safe, affordable housing. The Economic Development activities provided job creation and retention services, further preventing homelessness. During Year 48, support was needed for local businesses to stay open and retain staff. Both the Downtown Coordinator and NewVue small business support were great resources for them. Our signs and facades program only completed one sign for the program year, however, the remainder of the funds are already set to be spent in the beginning of program year 49 to exceed our original goal, with additional businesses lined up for assistance with our new entitlement. Demolition funds have been set aside to begin this year with the hope of demolishing at least 2-3 blighted buildings. With respect to housing, the Department has experienced a number of staffing challenges which limited our capacity to complete and close out projects in a timely manner. Some of this was due to staff capacity to draw down funding, required in order to close out projects. As a result, our completed rental project for Moran Square apartments will be reported in the next program year.

CR-10 - Racial and Ethnic composition of families assisted

**Describe the families assisted (including the racial and ethnic status of families assisted).
91.520(a)**

	CDBG	HOME
White	3,632	2
Black or African American	1,810	0
Asian	62	0
American Indian or American Native	32	0
Native Hawaiian or Other Pacific Islander	1	0
Total	5,537	2
Hispanic	151	0
Not Hispanic	5,386	2

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

During the program year, a total of 5537 families were assisted, of which 33% identified as Black or African American, roughly 1% Asian, American Indian/American Native, and Native Hawaiian or other Pacific Islander, and the remaining 66% white. The ethnicity was just under 3% Hispanic.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	1,254,239	1,173,050
HOME	public - federal	2,550,182	436,027

Table 3 - Resources Made Available

Narrative

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide	100	100	

Table 4 – Identify the geographic distribution and location of investments

Narrative

The City provides funding to the North Start Family Services Shelter in an adjacent City, however, the funds are used for the benefit of Fitchburg residents who require shelter. Because our funding is assisting residents who were living in Fitchburg at the time of becoming homeless, we consider this within our CDBG target area of Citywide.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

During the program year, funds were leveraged for a number of activities. Our business assistance funds provided \$110,160 to businesses and leveraged \$52500 in other loans and grants. Our Downtown Coordinator project leverages approximately \$35,000 in matching funds from Fitchburg State University. Our HOME Program funds provided \$130,000 in assistance to the Moran Square Redevelopment rental project and leveraged over 23,811,880. The Moran Square redevelopment completed in July of this past year and no funds are being carried forward.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	0
2. Match contributed during current Federal fiscal year	0
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	0
4. Match liability for current Federal fiscal year	0
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	0

Table 5 – Fiscal Year Summary - HOME Match Report

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at begin-ning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
145,513	111,096	167,811	0	88,798

Table 7 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period									
	Total	Minority Business Enterprises				White Non-Hispanic			
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic				
Contracts									
Dollar Amount	3,746,350	0	0	0	0	3,746,350			
Number	5	0	0	0	0	5			
Sub-Contracts									
Number	0	0	0	0	0	0			
Dollar Amount	0	0	0	0	0	0			
	Total	Women Business Enterprises	Male						
Contracts									
Dollar Amount	0	0	0						
Number	0	0	0						
Sub-Contracts									
Number	0	0	0						
Dollar Amount	0	0	0						

Table 8 - Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

Table 9 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition

Parcels Acquired	0	0			
Businesses Displaced	0	0			
Nonprofit Organizations Displaced	0	0			
Households Temporarily Relocated, not Displaced	0	0			
Households Displaced	Total	Minority Property Enterprises			White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	
Number	0	0	0	0	0
Cost	0	0	0	0	0

Table 10 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	18	3
Number of Special-Needs households to be provided affordable housing units	2	1
Total	20	4

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	2	0
Number of households supported through Rehab of Existing Units	18	4
Number of households supported through Acquisition of Existing Units	0	0
Total	20	4

Table 12 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

During the program year, Habitat for Humanity of North Central MA's critical repair program, (987) assisted three homeowners with repairs. In addition, the Homeowner Repair Program continued with five homeowner repair units with a sixth unit representing a tenant unit in an owner occupied property, (960,969,957, 997,999, 970). During the program year only one of these was completed during the program year (994). The remaining will be reported as complete in the next year's CAPER.

Due to a number of factors, primarily the high cost of construction, and staffing limitation, the City decided it will end its homeowner repair program and stopped taking new cases mid year. As a result, the number of projects initiated and completed is lower than anticipated.

With respect to rental housing development, the Moran Square Redevelopment Project, (958), completed during the project year. Unfortunately, we were not able to close the project in IDIS before the end of the program year. This was due to staffing issues limiting our ability to draw final payments from HUD's system prior to the year end. As a result, we will. Of the 44 units developing, 5 units are HOME funded affordable units. Although the majority of tenants occupied the property between March- May 2023, The Project's ribbon cutting ceremony was held on June 22, 2023.

Although not noted in IDIS, progress was made on two other rental development projects. The City increased its HOME funding commitment to NewVue Communities' rental project, a conversion of the former BF Brown school into 68 units of affordable artist preference housing. This project will now receive \$850,000 in HOME funding- the most funding the city has ever given to one project. The project closed on its funding at the end of June 2023 and is now under construction. Ten units will be HOME funded. North Star Family Shelter's Journey Home project in Leominster also received a renewed commitment letter of \$600,000 in HOME funds. The project received commitments from the state for the balance of the needed funding and expects to close the fall of 2023. This project will create 15 units of affordable supported housing for families ready to leave the shelter in Leominster MA, five of which will be HOME funded.

Discuss how these outcomes will impact future annual action plans.

Unfortunately we see the high cost of construction continuing to be a challenge for completing the number of units in a given year that we were producing when the plan this consolidated plan was created. When an average homeowner repair project with lead paint costs between \$60,000 and \$100,000 it is extremely limiting to our programs. The city does not intend to continue to our homeowner repair program after the completion of the remaining homeowner projects. For the time being the City is focusing its HOME Program dollars on rental housing and potential homeownership projects.

During the next CAPER, we will report the completion of Moran Square and progress on Fitchburg Arts Community, and Leominster's Journey Home project. The PJ also anticipates more funding will be spent on the development of new housing, considering the dire need for additional units throughout the Commonwealth of MA, and within the region. We anticipate being able to meet our rental unit numbers in the overall CAPER, but may not meet our homeowner repair numbers.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	1	0
Low-income	1	0
Moderate-income	2	0
Total	4	0

Table 13 – Number of Households Served

Narrative Information

THabitat for Humanity's (987) three projects assisted an extremely how income household, a low-income household and a moderate income household. Two of the households were single mother's with children The fourth household was an elderly household (994), of 3 earning below 60% of the Area Median Income. In addition, four homeowner repair projects are still in process. One is two family owner occupied property, the homeowner (969) is a single parent of moderate income with a low income tenant (970). IDIS 964 is a multi-genrational family with elder owners under 50% AMI, a single mom of a large family (957) under 80% AMI, and a low income elder (999).

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

The City of Fitchburg provided Year 48 CDBG funds to the North Star Family Services Shelter and the Board of Health Street Outreach Program. NSFS is an emergency shelter which provides case management services to homeless families, which includes assistance with employment, finances, medical issues and securing permanent housing.

A working relationship between the Police Department, Fire Department, Mayor's Office, and the Board of Health has resulted in a unified, and individualized, approach to their efforts. In Year 48, CDBG funding was awarded to the Board of health to support a continuing program called Street Outreach. During the program year, the homeless street outreach team implemented outreach services and CDBG funded one full time employee doing outreach staff work in the field, identifying and interacting with individuals who are homeless, providing appropriate referrals and resources. They accompany folks to appointments and agencies to ensure a successful experience and assist with any paperwork and/or documentation that may be required. In addition, a certified recovery coach assisted with coordinating treatment recovery, dedicated weekly time slots were added at Restoration Recovery where the team accompanies individuals to help them get plugged into the Continuum of Care system to obtain permanent housing. HIV and STD testing is done monthly, COVID vaccines are provided monthly. The team meets with Lt. Howe at the Police Dept. weekly for discussions of ongoing issues, and a provider group meets weekly, and regular clean-ups of former homeless camps are conducted.

During the year, street outreach team had a total of 6,930 interactions with the target population, 26 Individuals completed substance use treatment and aftercare programming, 150 applied for a Massachusetts ID which includes obtaining a birth certificate and coordination with the Sheriff's office for an RMV appointment and transport, SMOC shelter had 72 male and 56 female referrals. Of those referrals, 40 were admitted. 20 individuals were permanently housed through SMOC Housing or Continuum of Care. 1,324 doses of Narcan was distributed and 35 Narcan trainings were conducted for groups, 120 referrals were acted upon for either City departments, Elected officials, or other public organizations. 64 referrals were directly to the Fitchburg Police Department. Approximately 180 individuals were given emergency shelter during winter storms. Therer were 10 outreach collaboratives at Riverfront park and the YMCA where each time an average of 75 people attended. 10 team providers gave 10 Fitchburg Interagency Team collaborative HUB meetings throughout the course of the year.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Fitchburg supported the following agencies which address the emergency shelter and

transitional housing needs of homeless persons living within Fitchburg: North Star Family Services offers emergency shelter to families. The City of Fitchburg provided NSFS with CDBG funds in Year 48 to assist in their efforts. The CDBG funds were only used to assist Fitchburg families. The City is also working with Central MA Housing Alliance, (CMHA) located in Worcester Ma to create a better presence in North Worcester County. CMHA is our Continuum of Care and provides funds and services for the entire Worcester County. It is currently being supported by Restoration Recovery who will be providing services with CDBG funds in the coming year 49.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The following activities aided in the prevention of low-income individuals and families with children from becoming homeless: HOME program activities in both Consortium cities; CDBG-CV support to MOC, which serves low-income and underserved families, and provided information and referral services to the Fitchburg Latino population; the Spanish American Center, also serving the same demographic and NewVue Communities to assist with navigating the various programs and resources available through other agencies. CDBG support to the Housing Rehabilitation programs of the Community Development Department Housing Division in Fitchburg and the Office of the Planning and Development in Leominster; CDBG support to the CDBG Administration and Planning component of the Community Development Department enabled all of the CDBG programs which aid the homeless and those at risk of homelessness to operate in Fitchburg. The Board of Health Code Enforcement performs inspections of dwellings and enforce the state's sanitary and building codes in order to improve Fitchburg's housing stock inspecting over 559 dwellings in Year 48. Community Legal Aid is in its third year as a CDBG recipient and provides legal services to those who are facing eviction and/or housing discrimination. The Boys and Girls Club of Fitchburg and Leominster provided Transportation to 116 Youth from the Fitchburg Public School system to the Boys and Girls Club of Fitchburg and Leominster so they could attend their afterschool program, Project Learn STEAM, offering 57 local youth transportation to a safe, positive place to learn and grow during crucial after school hours between 2 p.m. and 7 p.m. to improve the educational outcomes of the youth served. The YMCA Spartacus Program is designed to promote the transformation of At-risk teens by utilizing the resources of the MCB Teen Center, the wellness center and Local Collaborators through adventure-based activities, boot-camp style workouts, academic tutoring, community service, leadership development, anger management counseling, and substance abuse assistance giving them the tools to succeed at school, at home, and in the community and go on to lead healthy, fulfilling lives.

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

1. **North Star Family Services** offered services to homeless families in securing permanent housing, employment and child care. They also provided follow up services to families after they have left the shelter, to make sure they are able to maintain permanent housing.
2. **AIDS CARE Services Supportive Housing Program** located in Fitchburg provided homeless prevention services to individuals living with HIV/AIDS and their family members.
3. **Veteran Hospice Homestead** located in Fitchburg offered transitional housing to veterans.
4. The **Fitchburg Veteran Services Office** provided referral services to veterans in need of housing and supportive services.
5. **VA Fitchburg Community-Based Outpatient Clinic** was opened in July 2015 providing services to Veterans living in the greater Fitchburg area. Services include primary care, mental health and lab blood drawing as well as connecting homeless veterans to appropriate services.
6. **Fitchburg Public Schools McKinney-Vento liaison** provided supportive services and referrals to homeless students and their families.
7. **ACTION Health Services** provided behavioral health, medical and dental care to the homeless as well publicly-housed individuals. Case management and skill training was offered to prevent homelessness.
8. **Community Legal Aid** provided legal services to those facing housing discrimination and/or eviction, as well as helped mediate landlord/tenant disputes that could lead to housing instability.
9. **Habitat for Humanity Critical Home Repair** identifies and works with existing homeowners to assess and alleviate critical health, life, and safety issues or code violations in need of repair.
10. **Board of Health Street Outreach Program** supplying necessary health, hygiene, and safety items as deemed appropriate by the outreach workers including referrals to medical/mental health/substance use treatment, shelter, etc.
11. **Fitchburg HUB**, an adhoc group of agencies working together and meeting twice a month to discuss challenges and solutions to homelessness issues. This is organized by the Board of Health's Outreach and Prevention Coordinator.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

The City's Community Development Department continues to build relationships with the housing authority and has provided commitments to assist in the rehabilitation of substandard housing authority units. We had been in discussions to provide HOME funding for the substantial rehabilitation of a long vacant, single family home owned by the Fitchburg Housing Authority, however, the Housing Authority was able to identify alternative funding allowing with fewer requirements than HOME funds.

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

In a previous program year, the City has made a commitment to provide matching funds toward the downpayment of a home for a public housing resident, up to \$10,000 though the HA's Project Able program. To date, no funds have been requested. During the past year, the Housing Authority started a Family Self-Sufficiency program and invited Community Development staff to join their program steering committee. Staff have attended two committee meetings.

Actions taken to provide assistance to troubled PHAs

N/A

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken 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. 91.220 (j); 91.320 (i)

Through the use of CDBG funds, The Sanitary Code Enforcement Inspectors of the Board of Health Code Enforcement team monitors and enforces compliance with sections of the State Sanitary Code that relate to housing, lead paint, asbestos, rodent, abandoned vehicles, graffiti, trash, and related nuisance complaints. Inspections were conducted on a total of 131 units and 559 dwellings, during the plan year. 1133 violations were issued and 1027 corrections were noted. 130 units received a code violation in the year and thirty one 130 were corrected using property owner's funding. No dwellings were demolished; 9 vacant and accessible buildings were boarded and secured under the orders of the target area inspector. Tickets, fines and court action have been issued to violators for various Sanitary and Building Code violations with efforts geared toward ridding target neighborhoods of conditions of blight and to promote proper and supervised repair to buildings. \$250.00 in fees, fines, and/or reimbursements were collected in the target area as a result of these efforts. There were 3 lead paint determinations conducted and 0 full lead inspections conducted in year 48.

In a previous year, the City created, then expanded its Smart Growth district in the downtown area. This allows for increased density within the district as well as reduced parking requirements, it also creates a requirement for a percentage of that housing to be affordable. In addition, the City is now working with a consultant to identify a geographical area within a half mile of our commuter rail station, which will allow multifamily housing to be created by right. The goal is to identify an area where at least 2600 units of housing can be created. The City expects this to a lengthy process to be completed by December of 2024.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

The principal obstacle in meeting underserved needs was the lack of adequate resources to address those needs in a comprehensive manner. The City of Fitchburg effectively and efficiently addressed many obstacles to meeting underserved needs by not only funding essential services through CDBG, but also by encouraging collaboration and cooperation among various city agencies and departments. The Year 48 Action Plan included funding to provide services to very low income families through the North Star Family Services (NSFS) shelter, which is the only family shelter in the region, and provides access to shelter, food, employment assistance, and case management. Through CDBG-CV funds, MOC and the Spanish American Center provided rent and utility assistance to income-qualified families affected by the COVID-19 pandemic and NewVue Communities provided housing counseling through their Housing Disruption Prevention Program.

Youth were served by Year 48 funding through afterschool programs provided by the YMCA Spartacus

Program for at-risk youth. The Boys and Girls Club of Fitchburg and Leominster provided Transportation to 116 Youth from the Fitchburg Public School system to the Boys and Girls Club of Fitchburg and Leominster so they could attend their afterschool program, Project Learn STEAM, offering local youth a safe, positive place to learn and grow during crucial after school hours between 2 p.m. and 7 p.m. to improve the educational outcomes of the youth served.

CDBG Funding in Year 48 enabled the Board of Health to continue a program called Street Outreach, which assisted an average of 430 individuals each quarter by supplying necessary health, hygiene, and safety items as deemed appropriate by the outreach workers including referrals to medical/mental health/substance use treatment, shelter, etc.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

During the program year, every housing repair project assisted by the City of Fitchburg had been tested for, and had lead paint hazards addressed if it was present.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

The Economic Development office, a division of the Community Development Department, worked with local businesses to create and/or retain low- and moderate-income jobs in the City of Fitchburg. This will ultimately reduce the number of persons below the poverty line. Year 48 CDBG funding was provided to NewVue Communities for the Small Business Technical Assistance Program. This program aided in the effort of assisting businesses to create/retain jobs, develop business plans and provide funds to leverage loans to small businesses in Fitchburg. The City recognized that the current level of federal, state and local resources is inadequate to sufficiently address the vast number of issues which contribute to, or are caused by, poverty. It continued, however, to address issues of homelessness, transitional housing needs, youth services, and economic development, all of which can be associated in part with poverty, through its CDBG program investments. Fitchburg State University's Downtown Coordinator also assisted Microenterprise businesses to develop and maintain their advertising in order to better market themselves and improve their exposure in and around Fitchburg and the local community through social media, public events, and even designing outdoor signage for one microenterprise.

The City continued to work with several local anti-poverty agencies to pursue available resources to combat poverty. Those agencies included NewVue Communities, Making Opportunities Count, (MOC) the designated regional anti-poverty agency serving the Consortium, as well as Community Legal Aid's Homelessness Prevention Program to provide thorough and comprehensive legal outreach and advocacy to Fitchburg's low income and elderly renters, with the goal of helping them obtain and maintain safe and affordable housing.

The North Central Massachusetts Regional Employment Board distributed information regarding publicly funded education, training and employment programs at the local Housing Authority sites. Information regarding the housing programs funded through CDBG and administered through the

Fitchburg Community Development Department was distributed locally at various human service agencies which serve lower income and minority populations.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

None at this time

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

The City works in collaboration with a number of housing entities and agencies including the Fitchburg Housing Authority. Ongoing relationships between these entities and social service agencies already exist, most notably, MOC, and the Fitchburg Housing Authority. The City continues to encourage the Farmer's Market run through Growing Places to remain in the downtown area near a number of Senior Housing Authority properties for ease of access to fresh produce.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

Recommendations in the current analysis of imediments to fair housing choice report included; improve public and private housing choices, improve and support informational programs which promote fair housing and housing opportunities; increase diversity on the Planning Board and the Zoning Board of Appeals, Promote visitability in housing by considering ways in which the concept of visitability can be included in residential projects, and record actions taken to eliminate identified impediments.

The City committed available resources to address housing needs through rehab. of homeownership and rental units, deleading of existing homeowner and rental units and provides development funding for the creating of new rental and homeownership units with community developers. The City promotes reuse of abandoned, former demolition lots; amends zoning and other regulatory requirements; uses public funds for demolition of abandoned and blighting properties; and encourages housing development and programs which service the elderly. In recent years, the City requested proposals for development of affordable housing on two city owned parcels, selling both parcels to Habitat for Humanity for nominal amounts. Rental projects funded with HOME Program are required to make at least 5% of those units accessible, and meet affirmative marketing requirements for the full affordability period under the program. The City monitors compliance with these requirements annually.

During the reporting period, the Community Development Dept. continued to provide as needed housing counseling and referral services to minority and low income property owners, renters and potential renters, along with NewVue Communities. The City also provided funding to Community Legal Aid to assist with wrongful eviction and/or housing discrimination. Additionally, with the onset of the pandemic, shut downs, and overall job losses, the City allocated some of its federal CDBG-CV assistance provided to MOC, our local CAP agency to provide service coordination and rent/utility/mortgage

assistance. The City added a 2nd vendor, the Spanish American Center, to provide rent assistance effective 5/1/21. Both projects were completed this year. NewVue Communities was just approved to use the remainder of their Cares Act funding to provide rent and Utility Assistance to clients who are income eligible Fitchburg residents in need. This project is expected to be completed within year 49.

The Fitchburg Housing Authority listed activities to affirmatively further fair housing in its 2015-2019 PHA Plan. The City's of Fitchburg holds its Community Resources Fair each fall and includes information on fair housing as well as information from the Public Housing Authority regarding their affordable housing.

InTown Fitchburg focused on several neighborhoods in the heart of our CDBG target area. The collaboration is focused in three key areas: economic development & entrepreneurship, housing, and community engagement. Through community engagement, the project proposes to increase the collective impact by developing systems that empower residents to address their needs in the neighborhood, build capacity of resident leaders and strengthen social connections among residents. MassDevelopment awarded Fitchburg with a TDI (Transformative Development Initiative) Fellow for 3 years. This Fellow works with the City and private developers to expand development in Downtown.

The City also continues to fund the Health Department's Code Enforcement activities in the CDBG target area, the areas with the highest concentration of low income rental households to improve the quality of housing for these renters.

CR-40 - Monitoring 91.220 and 91.230

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

Fitchburg's Community Development Department will continue its practice of conducting regular program meetings during which the following agenda will be addressed: Review of all active housing cases and issues, including codes and CDBG/HOME regulatory compliance; Review of all proposed projects for compliance with program priorities and conformance with Consolidated Plan goals and strategies; including timeliness of expenditures; Review overall progress in meetings goals and strategies of the Consolidated Plan.

Final housing project recommendations are subject to the review and approval of the Community Development Executive Director and the Director of Housing and Development. Individuals who disagree with a decision or other action of the housing program or its staff, may appeal first to the Community Development Executive Director and then subsequently, to the Planning Board at a regularly scheduled monthly meeting. Both Fitchburg and Leominster's CDBG and HOME funded housing and code enforcement staff will work with their respective building departments and other municipal departments to ensure long term compliance with housing codes, and other appropriate regulations and statutes.

Contractor advertisements related to housing rehab include the statement: "Minority and women owned contracting firms and Section 3 businesses (owned by 51% or more by low or very-low income persons) are strongly encouraged to apply." In addition to its regular meetings, the Department solicits citizen participation and comment on its performance in meeting its overall Consolidated Plan program goals throughout each program year. Citizens and interested parties may offer comments at public hearings, etc. Any member of the public may review housing program policies and other public information available at the Community Development Department.

Both Fitchburg and Leominster participated in the North Central Mass. Community Reinvestment Act Coalition (NCMCRA) and the Continuum of Care Coalition which meets regularly with agencies and individuals representing various community needs, including the housing needs of the low income, minority and special needs population.

The City funded anti-poverty and minority agencies, including NewVue Communities, Inc., North Star Family Services, the Street Outreach Program, and MOC, Inc. Through the NewVue Communities CDBG-funded Microenterprise Program, income documentation was required for job creation and job retention with low-mod percentages. The CDBG mailing list includes minority agencies.

Performance Measurement was included in CDBG applications and monitoring forms. Action Plans

contained activity descriptions, outputs and outcomes. The CDBG/HOME staff regularly monitored the programs and projects carried out under its CDBG and HOME programs. Program Monitoring and Fiscal Monitoring tools were used by Community Development Department when conducting formal agency monitoring. Job creation/job retention forms were used by CDBG subrecipients when appropriate. In addition to monitoring activities, an audit was required as part of the CDBG application and is reviewed upon receipt.

The Community Development Department's Director of Housing and Development was responsible for insuring that information submitted to HUD, through its IDIS reporting system, is correct and complete.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

The City maintains a Citizen Participation Plan to guide the Department in seeking public comment on Action Plans, Amendments, and Performance Reports.

In addition to the standard legal ads in the local newspaper, the Community Development Department utilizes its website, departmental newsletter, and social media accounts to alert the public to formal opportunities for feedback, including the Public Comment Form and public meetings. Staff contact information is available on the City website, and the comment portal remains open throughout the year.

Looking ahead, the City will be reviewing and possibly updating its CPP to identify opportunities for increased outreach and participation.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

The jurisdiction had no changes in the program objectives for the CDBG Year 48

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

CR-50 - HOME 24 CFR 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based upon the schedule in 24 CFR §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

During the program year, the following HOME projects were due for and were inspected:

470 Main Street- passed on first inspection.

Fitchburg Place – inspected, an updated elevator certificate was required, extermination of pests (was underway, needed completion), and peeling paint was present in the bathroom of one unit. We are awaiting re-inspection.

Riverside Village-inspected, peeling paint & mold found in bathroom unit, bathtub only has hot water, a second bathroom unit also had mold and peeling paint and a mechanical fan not working. We are awaiting re-inspection.

Silverleaf Terrace- inspected and passed on first inspection.

Water Mills – inspected, one violation found- a loose toilet, We are awaiting re-inspection.

YarnWorks –inspected, passed on first inspection.

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 24 CFR 91.520(e) and 24 CFR 92.351(a)

During the program year, Moran Square Apartments was completed and rented. The Developer provided a thorough affirmative marketing plan outlining actions to reach those least likely to apply and complying with HOME requirements. During annual monitoring of existing rental units, all ongoing projects are required to provide detail on marketing efforts for vacancies and must follow their own plans created and approved at the time of project funding.

Refer to IDIS reports to describe the amount and use of program income for projects,

including the number of projects and owner and tenant characteristics

During the program year the following projects were assisted with Program Income funds:

952- \$76, 798.40. The beneficiaries include a two-elder household who are brothers, having an income level of 50% AMI and both being white and non-hispanic.

912- \$3805. The beneficiaries are a white, non Hispanic, two person, elder household with an income below 80% AMI.

964 \$1761- The beneficiaries are a white Hispanic household of five, with an elder head of household and income below 80% of AMI.

889 and 941- \$47885.19- this is Program Income allocated to admin and used for the administration of the HOME program.

**Describe other actions taken to foster and maintain affordable housing. 24 CFR 91.220(k)
(STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 24 CFR 91.320(j)**

Several community programs have also been funded with CDBG funding to foster and maintain affordable housing as well. The City's CDBG funded Community Legal Aid to assist Fitchburg residents with eviction prevention, funded Habitat for Humanity's critical home repair to assist low income homeowners to make needed home repairs, and funded code enforcement to ensure low income renters can live in housing that meets state required quality standards

CR-58 – Section 3

Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	0	0	0	0	0
Total Labor Hours	0	0			
Total Section 3 Worker Hours	0	0			
Total Targeted Section 3 Worker Hours	0	0			

Table 14 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA	HTF
Outreach efforts to generate job applicants who are Public Housing Targeted Workers	0	0			
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.	0	0			
Direct, on-the job training (including apprenticeships).	0	0			
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.	0	0			
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).	0	0			
Outreach efforts to identify and secure bids from Section 3 business concerns.	0	0			
Technical assistance to help Section 3 business concerns understand and bid on contracts.	0	0			
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.	0	0			
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.	0	0			
Held one or more job fairs.	0	0			
Provided or connected residents with supportive services that can provide direct services or referrals.	0	0			
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.	0	0			
Assisted residents with finding child care.	0	0			
Assisted residents to apply for, or attend community college or a four year educational institution.	0	0			
Assisted residents to apply for, or attend vocational/technical training.	0	0			
Assisted residents to obtain financial literacy training and/or coaching.	0	0			
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.	0	0			
Provided or connected residents with training on computer use or online technologies.	0	0			
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.	0	0			
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.	0	0			

Other.	0	0		
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Table 15 – Qualitative Efforts - Number of Activities by Program

Narrative

Our streetscapes activities up to this point have been combined activities. Each program year. While the activities combined exceed \$200,000, we have not had a single construction project that has exceeded \$200,000 in construction work that was contracted out to an individual company. Most of the work is completed by the municipality and therefore have had no section 3 eligible activities.