

## Expected Resources

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

#### Introduction

The Consortium anticipates annually allocated funds of \$929,220 between 2022 and 2026. Over the next five years, roughly \$2,727,465 will support subsidized housing development, home rehabilitation and repair, clearance activity, and acquisition efforts across the Consortium. Other potential funding uses may become possible in the future, but estimates for future years remain unfinalized. Please note the numbers for the remaining four years of the Consolidated Plan are estimates only. The Consortium anticipates rehabbing fifteen homeowner units with Habitat for Humanity, developing two units, and is strategically planning for three units. Since 2010, the Consortium has seen a 24 percent decrease in HOME funding and a 19 percent decrease in CDBG Entitlement funding. The Consortium maximizes the impact of funds by encouraging partners and projects to leverage non-federal resources in addition to HOME/CDBG dollars. Other grants secured in the Consortium

are used to advance goals outlined in this Strategic Plan.

### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	929,220	240,000	27,367	1,196,587	4,251,348	Numbers are estimates only for remaining four years of the Con Plan. Annual allocations are expected to be divided as follows: 20% for Administration; 15% reserved for public services (not to exceed).

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	545,493	324,963	1,679,726	2,550,182	2,496,973	These numbers are estimates for the remaining four years of the Con Plan. Annual allocations are expected to be divided as follows: 10% for Administration; 15% reserved for CHDO; and the remaining for homeowner assistance, rental development and homeowner development activities. Please note- the amount available in year one is high, due to prior year resources.

Table 1 - Expected Resources – Priority Table

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

There are several programs where leveraged funds play a role. These are:

- LIHTC or Historic Tax Credit projects. LIHTCs apply to acquisition, rehab, or new construction. Properties: Fitchburg Place, 4 Leighton Street, Yarn Works, Moran Square, and 10 Summer Street. Leominster properties: Silver Leaf, Riverside Village, Water Mills, Ivory Keys, and Carter School. 4 tracts qualify: 3 in Fitchburg (7105, 7107, and 7108) and 1 in Leominster (7094). The cities use LIHTCs to designate Difficult Development Area(s). There are 12 DDAs in the Consortium. Under the Tax Credit program, a certified rehab project

- on income-producing property can receive 20% of the cost of certified rehab expenditures in credits.
- MassWorks Grants provide capital for infrastructure projects that accelerate housing, private development, and job creation. Fitchburg received \$3 mill for Downtown by supporting new housing/mixed-use, the Fitchburg Theater rehab, converting Main and Boulder Sts for safety. The project generated 182 units and commercial opportunities. Leominster received \$2.5 mill for Whitney Field including the Mall expansion.

HOME and CDBG match:

- Inclusionary Zoning and Linkage Fees - under zoning, developments must provide on-site units for affordable housing. The cities may allow required units/lots off-site or contribute funds equal/greater in value. There is also interest in doing this with Habitat for Humanity. The Consortium will allocate HOME to mixed-income projects. HOME has leveraged \$514,900. Local funds will also support affordable housing via CDBG.
- The Consortium works with providers who offers grants to LMI households to lower energy costs. MOC operates the program with other funding; Fitchburg leverages via the Homeowner Rehabilitation Program.
- Under the MRVP, DHCD makes vouchers available to the homeless. The state provides vouchers for project and tenant-based opportunities with PHAs.
- Volunteer hours from Habitat for Humanity
- PHAs and the state provide a certain percentage of Housing Choice Vouchers for specific projects.
- The Consortium requests and investment in on- or offsite improvements from developers when working on HOME.
- Fitchburg's funding for the removal of lead-based paint, dust, and soil hazards have come from awards of public and private matching funds,
- Philanthropy and funds through the CoC. These resources can be donated materials; volunteer labor; value from land or real property; etc.
- CDBG funds match for Urban Renewal Funds. FRA received a 20-year commitment of funds. This will result in about \$30 million for implementation.
- Funding Fitchburg State for the North of Main Beautification Program PARC funding from the MA Office of EEA, the state earmarked funds from the Sam Pawlak Community Group.
- DPW and other staff apply for projects, matching CDBG with budget funding and other sources i.e., Safe Routes to Schools.
- State offices use CDBG for Complete Streets, brownfields, TDI, etc. MassDevelopment used tax credits with CDBG for Urban Fork.

- DHCD has matched CDBG to expand the 40R district

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

[See Appendix for Figure "A snapshot of leveraged funds for 2022."]

The Consortium has received applications for potential affordable developments on publicly-owned land and anticipates this will continue. There are currently seventeen FHA housing projects on publicly owned land. Both cities may use publicly owned land or property to address community development needs identified in this plan. Some examples include infrastructure projects on public sidewalks and streets in the target areas (based on funding availability). Public recreation sites and facilities often receive CDBG funding as well.

**Discussion**

The Consortium actively seeks opportunities to match federal funds with local and state opportunities to create and preserve affordable housing and community development. The Consortium continues to allocate ten percent of its HOME funds to Program Administration and 15 percent to its CHDO set aside, per HUD regulations. The remaining 75 percent is for various homeowner and rental projects outlined in the Priority Needs (SP-25) and Goals (SP-45) sections. The City allocates the maximum 15 percent of its annual CDBG allocation to public services and the required 20 percent to Administration and Planning. Through collaboration with partners and matching funds, the Consortium estimates rehabbing fifteen units, developing two units, and strategically planning for three units throughout this Consolidated Plan.

## Annual Goals and Objectives

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

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Facility Improvements	2022	2026	Non-Housing Community Development	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide	Public Facilities and Infrastructure	CDBG: \$353,903	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 16900 Persons Assisted
2	Public Services	2022	2026	Non-Homeless Special Needs Non-Housing Community Development	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide	Public Services	CDBG: \$139,245	Public service activities other than Low/Moderate Income Housing Benefit: 3680 Persons Assisted Homeless Person Overnight Shelter: 5 Persons Assisted Homelessness Prevention: 2 Persons Assisted
3	Economic Development	2022	2026	Non-Housing Community Development	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide	Economic Development	CDBG: \$162,769	Businesses assisted: 15 Businesses Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Emergency Shelter Program	2022	2026	Homeless	CDBGTarget Area, CDBG Strategy Area, Housing Strategy Area, Citywide	Emergency Shelter		
5	Clearance Activity	2022	2026	Non-Housing Community Development	CDBGTarget Area, CDBG Strategy Area, Housing Strategy Area, Citywide	Clearance Activity		
6	Rehabilitation and Preservation	2022	2026	Affordable Housing	CDBGTarget Area, CDBG Strategy Area, Housing Strategy Area, Citywide	Rehabilitation and Preservation	CDBG: \$284,826 HOME: \$750,000	Rental units rehabilitated: 5 Household Housing Unit Homeowner Housing Rehabilitated: 15 Household Housing Unit Housing Code Enforcement/Foreclosed Property Care: 200 Household Housing Unit
7	Rehabilitation and/or Acquisition	2022	2026	Affordable Housing	CDBGTarget Area, CDBG Strategy Area, Housing Strategy Area, Citywide	Rehabilitation and/or Acquisition	HOME: \$132,365	Direct Financial Assistance to Homebuyers: 4 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	Acq./Dev/Rehab by Non-profit Housing Providers	2022	2026	Affordable Housing	CDBGTarget Area, CDBG Strategy Area, Housing Strategy Area, Citywide	Acq, Dev and Rehab by Nonprofit Housing Providers	HOME: \$1,350,000	Rental units constructed: 10 Household Housing Unit Rental units rehabilitated: 5 Household Housing Unit Homeowner Housing Added: 2 Household Housing Unit
9	HOME Administration	2022	2026	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBGTarget Area, CDBG Strategy Area, Housing Strategy Area, Citywide	HOME Administration	HOME: \$54,549	Other: 1 Other
10	CDBG Administration	2022	2026	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBGTarget Area, CDBG Strategy Area, Housing Strategy Area, Citywide	CDBG Administration	CDBG: \$185,844	Other: 1 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
11	Rental Development by For-profit Developers	2022	2026	Affordable Housing	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide	Rehabilitation and Preservation	CDBG: \$0 HOME: \$0	

**Table 2 – Goals Summary**

## Goal Descriptions

1	<b>Goal Name</b>	Public Facility Improvements
	<b>Goal Description</b>	To promote the development, expansion and improvement of infrastructure, particularly streets, sidewalks, street beautification, building upgrades, and park/recreation improvements throughout the Consortium via direct funding and by leveraging other funding sources
2	<b>Goal Name</b>	Public Services
	<b>Goal Description</b>	To promote services relating to mental health, substance use disorder, homelessness, and youth, working towardeliminate issues through the provision of a variety of service programs, including programs that offer housing services. Provision of these services will focus on the most vulnerable populations in the City. Also To reduce individual and family homelessness by providing overnight shelter to homeless families and individuals.
3	<b>Goal Name</b>	Economic Development
	<b>Goal Description</b>	To address issues of neglected storefronts; poor appearance of business districts; neighborhood revitalization; rehabilitation of commercial buildings particularly in the Downtown; and small business/microenterprise loans and technical assistance. A large part of this goal will be providing technical assistance to start up and/or existing businesses with business plan development, marketing and financing.

4	<b>Goal Name</b>	Emergency Shelter Program
	<b>Goal Description</b>	
5	<b>Goal Name</b>	Clearance Activity
	<b>Goal Description</b>	To revitalize neighborhoods and eliminate structures that have fallen into a state of disrepair, primarily through demolition. These structures pose an imminent threat to public safety and contribute to the issues of slum and blight in LMI neighborhoods.
6	<b>Goal Name</b>	Rehabilitation and Preservation
	<b>Goal Description</b>	To preserve and maintain the existing affordable housing stock, particularly those units occupied by LMI individuals and families. Also, to revitalize neighborhoods and preserve the physical/financial viability of existing housing by enforcing state sanitary and building codes. This includes code enforcement, Habitat's critical repair program for low income homeowners (4 units) HOME funds for homeowner repair (8) and rental repair (3). CDBG funding also includes projected revolving loan funds (2 rental units, 3 homeowner repairs).
7	<b>Goal Name</b>	Rehabilitation and/or Acquisition
	<b>Goal Description</b>	
8	<b>Goal Name</b>	Acq./Dev/Rehab by Non-profit Housing Providers
	<b>Goal Description</b>	To preserve and maintain existing affordable rental opportunities, particularly units occupied by LMI households. Also, to revitalize neighborhoods and preserve the physical/financial viability of existing rentals, via partnerships with providers for long-term housing options. Projects are projected to include 2 new units of affordable homeownership through Habitat for Humanity and two non-profit rental developments, one NewVue Communities, the other North Star Family Services.
9	<b>Goal Name</b>	HOME Administration
	<b>Goal Description</b>	Administration of HOME funds and affordable housing activities that include grant writing to leverage other federal and state resources.

<b>10</b>	<b>Goal Name</b>	CDBG Administration
	<b>Goal Description</b>	Administration of CDBG funds and planning activities that include grant writing to leverage other federal and state resources.
<b>11</b>	<b>Goal Name</b>	Rental Development by For-profit Developers
	<b>Goal Description</b>	To create affordable rental opportunities, particularly units occupied by LMI households. Also, to revitalize neighborhoods and preserve the physical/financial viability of existing rentals, via partnerships with developers for longterm housing options.

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

### Introduction

The HOME Consortium will dedicate its PY48 fund allocation to fund services and emergency shelters. The Consortium will seek out opportunities for CHDO development and housing that combines living arrangements with service provision where possible. The Consortium also plans to dedicate a portion of its allocation to serve homeless populations. The City of Fitchburg's CDBG program will use its PY48 allocation toward public services, economic development, and facilities/infrastructure, emphasizing technical assistance for businesses as the City continues to improve from the setbacks caused by COVID-19. Extensive data analysis and a community survey, focus groups, a homeless shelter survey, a social service agency survey, and meetings with the 2022-2026 Consolidated Plan Advisory Committee informed the selection of the projects in Table 55. Fitchburg held an advertised public hearing to solicit comments about the Plan, review its accuracy, and ensure needs were addressed herein. Information on participating was posted on social media channels and the City's website. Members of organizations representing low-income neighborhoods, minorities, homeless persons, and other special needs populations were encouraged to participate through advertisements in local print media, public hearings, and the aforementioned surveys. Lastly, drafts of the 2022-2026 Consolidated Plan and PY48 AAP were posted on the City's website throughout the comment periods, and a final hearing was held before submission to HUD for approval. The severe impact of COVID-19 has also been considered when compiling the projects list, with priority given to projects that remediate the issues it has caused. The Citizen Participation Plan efforts and the feedback generated from those efforts can be found in the Appendix.

#	Project Name
1	Parkhill Park Phase II
2	Family Homeless Shelter
3	Drug Enforcement and Patrol Program
4	Small Business Technical Assistance
6	Code Enforcement
7	Street Outreach
8	Critical Home Repair
9	CDBG Administration and Planning
12	Parks & Playgrounds
13	Sidewalk Accessibility
14	Streetscape Improvements
15	Friends of the Abolitionist Park Phase III
16	Summer Street Art Improvements
17	Community and Development Department Public Art
18	Fitchburg Farmers' Market
19	Spartacus

#	Project Name
20	Fitchburg Homelessness Prevention Project
21	Project Learn STEAM Transportation
22	Small Business Financial Assistance
23	Sign and Facade Program
24	Fitchburg Downtown Coordinator
25	homeowner repair- rehab & preservation owner & tenant units
26	homebuyer acquisition
27	homebuyer development
28	rental development
29	rental rehabilitation by non profits
30	HOME Administration
31	Housing Program Delivery

**Table 3 – Project Information**

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

Data analysis and community engagement efforts including focus groups, a community survey, a homeless shelter survey, a social service agency survey, and meetings with the Consolidated Plan Advisory Committee informed project selection. Members of organizations representing low-income neighborhoods, minorities, homeless persons, and other interested populations were encouraged to participate via advertisements in the local print media, public hearings, and surveys. An advertised public hearing for public comment on the Plan and the subsequent 30-day public- comment period provided further information and feedback. The City posted instructions for engaging in these processes on social media channels and the City’s website and drafts of the 2022 2026 Consolidated Plan and PY48 AAP throughout the comment periods. Before final submission to HUD for approval, the City held a final hearing to adopt the Plans. The list in Table 55 also was compiled within the parameters of HUD’s grant requirements, with activities targeted in the CDBG Target Area to benefit LMI populations making 80 percent or less than the Area Median Income (AMI). Compliant with national objective requirements, at least 70 percent of activities benefit LMI households. These housing activities focus in the Housing Strategy Area, comprised of older urban neighborhoods and populations most in need. There must be 51 percent LMI occupancy for rental units in multifamily developments, and households occupying single-family units must be at or below 80 percent AMI. Homeowner and rental assistance receive the remaining 75 percent of funds from the allocation. HUD established administrative and public service caps to structure the dispensation of funds, but the Consortium and the City of Fitchburg designate project funding based on community needs.

The main obstacles to effective implementation are funding, adequate resources, and staff capacity. Other obstacles to addressing needs include geography, limited public transportation, high land and development costs, a recovering housing market, drug use, inadequate services to meet the need, lack of adequate “living wage” employment, and vacancy/abandonment issues. Alternatively, social service

agencies have a high need for appropriately credentialed staff. Available services are struggling to keep up with demand. Low wages, a limited supply of quality housing, and a lack of services in surrounding communities exacerbate these challenges by further stretching the resources of Fitchburg's supportive services. LMI populations in the Consortium are already finding it difficult to afford the cost of living, even in lower-cost areas; those who are homeless or transitioning out of homelessness are particularly vulnerable to these challenges.

## **AP-38 Project Summary**

### **Project Summary Information**

1	<b>Project Name</b>	Parkhill Park Phase II
	<b>Target Area</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Public Facility Improvements
	<b>Needs Addressed</b>	Public Facilities and Infrastructure
	<b>Funding</b>	CDBG: \$55,806
	<b>Description</b>	This funding will be used to improve and maintain park/recreation facilities and open space in the City to better nearby LMI neighborhoods and the population at-large. This amount is available based on prior year resources and PY2022 grant funding.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is anticipated that 8,450 LMI families will benefit from the proposed project throughout PY48.
	<b>Location Description</b>	City of Fitchburg
	<b>Planned Activities</b>	The City will continue to work with related organizations and departments to improve accessibility, make aesthetic upgrades, and promote active lifestyles for the community.
2	<b>Project Name</b>	Family Homeless Shelter
	<b>Target Area</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$9,290
	<b>Description</b>	Program funds will provide emergency housing for homeless families in North Worcester County, including case management and follow up services.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated NSFS will screen 200-250 referrals during the year, and expects to serve 10-15 Fitchburg families in the shelter and emergency services.
	<b>Location Description</b>	City of Fitchburg

	<b>Planned Activities</b>	The City will continue fostering relationships and providing funding to non-profit partners to end homelessness. The CDBG funds will be used to partially pay for the NSFS Operations Manager salary costs.
<b>3</b>	<b>Project Name</b>	Drug Enforcement and Patrol Program
	<b>Target Area</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$60,385
	<b>Description</b>	This funding will provide police overtime expenses related to drug investigation activities in the CDBG Strategy Area and foot/motorcycle/bicycle patrols in the Main Street Area. This amount is available based on prior year resources and PY2022 grant funding.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is anticipated that 1,844 LMI individuals will benefit from the proposed project throughout PY48.
	<b>Location Description</b>	City of Fitchburg
	<b>Planned Activities</b>	The City will continue to conduct drug investigations, including surveillance, execution of warrants, arrests, and seizure of drugs, firearms, and U.S. currency.
<b>4</b>	<b>Project Name</b>	Small Business Technical Assistance
	<b>Target Area</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Economic Development
	<b>Needs Addressed</b>	Economic Development
	<b>Funding</b>	CDBG: \$23,253
	<b>Description</b>	Program funds will provide outreach and technical assistance to businesses, as well as help leverage loans for small businesses. This amount is available based on prior year resources and PY2022 grant funding.
	<b>Target Date</b>	6/30/2023

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 40 businesses will be served (unduplicated count), 60 jobs will be created/retained, and 3 loans will be facilitated. Funds will be used to pay staff salary.
	<b>Location Description</b>	City of Fitchburg
	<b>Planned Activities</b>	The City will continue to support the business community, particularly in the Downtown, to prosper in the City, employ local workers, expand workforce development, and make aesthetic upgrades. NewVue has seen an increase in the need for intensive services for small business, and requests additional funds to meet this need for expanded support.
<b>5</b>	<b>Project Name</b>	Code Enforcement
	<b>Target Area</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Rehabilitation and Preservation
	<b>Needs Addressed</b>	Rehabilitation and Preservation
	<b>Funding</b>	CDBG: \$96,224
	<b>Description</b>	Program funds will be used to pay 100% of one existing full-time BOH Inspector positions and 50% of one full-time Clerk position. This amount is available based on prior year resources and PY2022 grant funding.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 200 housing units and 900 dwellings will be inspected in the CDBG strategy area.
	<b>Location Description</b>	City of Fitchburg
	<b>Planned Activities</b>	City staff will continue to work together to rehabilitate and inspect for code violations to improve the quality of housing and life for LMI neighborhoods. Through the enforcement of the State's Sanitary and Building Codes, Fitchburg's housing stock will be greatly improved.
<b>6</b>	<b>Project Name</b>	Street Outreach
	<b>Target Area</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services

	<b>Funding</b>	CDBG: \$26,012
	<b>Description</b>	This funding will be dedicated to increasing the availability and accessibility of public services and programs throughout the City. This amount is available based on prior year resources and PY2022 grant funding
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is anticipated that 1,844 LMI individuals will benefit from the proposed project throughout PY48.
	<b>Location Description</b>	City of Fitchburg
	<b>Planned Activities</b>	The City will continue to foster relationships and provide funding to the Health Department specializing in public service provision.
7	<b>Project Name</b>	Critical Home Repair
	<b>Target Area</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Rehabilitation and Preservation
	<b>Needs Addressed</b>	Rehabilitation and Preservation
	<b>Funding</b>	CDBG: \$18,602
	<b>Description</b>	Critical Home Repair is exterior or interior work to alleviate critical health, life, and safety issues or code violations for homeowners in need.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Program funds will be used to fund 4-6 critical repairs in Fitchburg, serving 10 households.
	<b>Location Description</b>	City of Fitchburg

	<b>Planned Activities</b>	The City will continue to promote health and safety and improve the quality of life for those in the target area and across the City by removing blighted and dangerous buildings/housing units. Participants must own their own home and have a verifiable need that falls within scope and capabilities. The home must be a primary principal residence, current on mortgage, property taxes and insurance. Repairs must be necessary to function in the home and homeowners must partner with Habitat.
<b>8</b>	<b>Project Name</b>	CDBG Administration and Planning
	<b>Target Area</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Public Facility Improvements Public Services Economic Development Emergency Shelter Program Clearance Activity Rehabilitation and Preservation Rehabilitation and/or Acquisition Acq./Dev/Rehab by Non-profit Housing Providers HOME Administration CDBG Administration Rental Development by For-profit Developers
	<b>Needs Addressed</b>	Public Facilities and Infrastructure Public Services Economic Development Emergency Shelter Clearance Activity Rehabilitation and Preservation Rehabilitation and/or Acquisition Acq, Dev and Rehab by Nonprofit Housing Providers HOME Administration CDBG Administration
	<b>Funding</b>	CDBG: \$185,844
	<b>Description</b>	This funding will be used to administer the Fitchburg-Leominster HOME program and the City of Fitchburg CDBG program.
	<b>Target Date</b>	6/30/2023

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	Fitchburg-Leominster HOME Consortium, City of Fitchburg
	<b>Planned Activities</b>	The City will continue to administer and monitor program activities, leverage other grants through grant writing, and administer leveraged grants.
<b>9</b>	<b>Project Name</b>	Parks & Playgrounds
	<b>Target Area</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Public Facility Improvements
	<b>Needs Addressed</b>	Public Facilities and Infrastructure
	<b>Funding</b>	CDBG: \$74,408
	<b>Description</b>	This funding will be used to improve and maintain park/recreation facilities and open space in the City to better serve LMI neighborhoods and the population at-large. This amount is available based on prior year resources and PY2022 grant funding.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is anticipated that 8,450 LMI families will benefit from the proposed project throughout PY48.
	<b>Location Description</b>	City of Fitchburg
	<b>Planned Activities</b>	The City will continue to work with related organizations and departments to improve accessibility, make aesthetic upgrades, and promote active lifestyles for the community.
<b>10</b>	<b>Project Name</b>	Sidewalk Accessibility
	<b>Target Area</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Public Facility Improvements
	<b>Needs Addressed</b>	Public Facilities and Infrastructure
	<b>Funding</b>	CDBG: \$39,994
	<b>Description</b>	This activity will improve sidewalk accessibility in Fitchburg.

	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is anticipated that 8,450 LMI families will benefit from the proposed project throughout PY48.
	<b>Location Description</b>	City of Fitchburg
	<b>Planned Activities</b>	The City will continue reviewing and approving funding applications for associated upgrades by City staff/departments.
11	<b>Project Name</b>	Streetscape Improvements
	<b>Target Area</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Public Facility Improvements
	<b>Needs Addressed</b>	Public Facilities and Infrastructure
	<b>Funding</b>	CDBG: \$155,791
	<b>Description</b>	This funding will be dedicated to street and sidewalk improvements, including ADA-compliant upgrades, throughout the City. This amount is available based on prior year resources and PY2022 grant funding.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is anticipated that 8,450 LMI families will benefit from the proposed project throughout PY48.
	<b>Location Description</b>	City of Fitchburg
	<b>Planned Activities</b>	The City will continue reviewing and approving funding applications for associated upgrades by City staff/departments.
12	<b>Project Name</b>	Friends of the Abolitionist Park Phase III
	<b>Target Area</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Public Facility Improvements
	<b>Needs Addressed</b>	Public Facilities and Infrastructure
	<b>Funding</b>	CDBG: \$4,651

	<b>Description</b>	This funding will be used to improve and maintain park/recreation facilities and open space in the City to better nearby LMI neighborhoods and the population at-large. This amount is available based on prior year resources and PY2022 grant funding
	<b>Target Date</b>	6/29/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is anticipated that 8,450 LMI individuals will benefit from the proposed project throughout PY48
	<b>Location Description</b>	City of Fitchburg
	<b>Planned Activities</b>	The City will continue to work with related organizations and departments to improve accessibility, make aesthetic upgrades, and promote active lifestyles for the community.
13	<b>Project Name</b>	Summer Street Art Improvements
	<b>Target Area</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Public Facility Improvements
	<b>Needs Addressed</b>	Public Facilities and Infrastructure
	<b>Funding</b>	CDBG: \$4,651
	<b>Description</b>	The City will work with the NCM Association of Realtors to beautify streetscapes, commercial centers, and LMI neighborhoods. This project will remove blight in an area often "tagged" with a professionally created mural.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is anticipated that 8,450 LMI families will benefit from the proposed project throughout PY48.
	<b>Location Description</b>	City of Fitchburg
	<b>Planned Activities</b>	The City will continue reviewing and approving funding applications for associated upgrades by City staff/departments.
14	<b>Project Name</b>	Community and Development Department Public Art
	<b>Target Area</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide

	<b>Goals Supported</b>	Public Facility Improvements
	<b>Needs Addressed</b>	Public Facilities and Infrastructure
	<b>Funding</b>	CDBG: \$18,602
	<b>Description</b>	The City will work with the Community and Development Department to beautify streetscapes, commercial centers, and LMI neighborhoods via public art.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is anticipated that 8,450 LMI families will benefit from the proposed project throughout PY48.
	<b>Location Description</b>	City of Fitchburg
	<b>Planned Activities</b>	The City will continue reviewing and approving funding applications for associated upgrades by City staff/departments.
15	<b>Project Name</b>	Fitchburg Farmers' Market
	<b>Target Area</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$7,327
	<b>Description</b>	This funding will be dedicated to increasing the availability and accessibility of nutritional food services and programs throughout the City. This amount is available based on prior year resources and PY2022 grant funding.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is anticipated that 1,844 LMI individuals will benefit from the proposed project throughout PY48.
	<b>Location Description</b>	City of Fitchburg
	<b>Planned Activities</b>	The City will continue to foster relationships and provide funding to partners and service agencies specializing in health and wellness
	<b>Project Name</b>	Spartacus

<b>16</b>	<b>Target Area</b>	CDBGTarget Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$11,148
	<b>Description</b>	Program funds will be used to support staff salary of the Teen Center Spartacus Program, offering services to at-risk youth between the ages of 13 and 18 who live in Fitchburg.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 50 youth will be served between September and June.
	<b>Location Description</b>	City of Fitchburg
	<b>Planned Activities</b>	Emphasis will be on Youth Development, Healthy Living, and Social Responsibility through physical fitness, team building, life skills training, community service, and outdoor activities.
<b>17</b>	<b>Project Name</b>	Fitchburg Homelessness Prevention Project
	<b>Target Area</b>	CDBGTarget Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$10,219

	<b>Description</b>	<p>Program funds will be used to assist low-income and elderly tenants at risk of eviction or loss of housing subsidy, in order to help prevent homelessness. Funds from the Fitchburg CDBG program will allow CLA to continue to assist tenants with eviction cases before their court dates and to represent subsidy program participants threatened with termination from the programs, work that we are unable to prioritize in the absence of dedicated funding. This project allows CLA to target specialized housing resources to Fitchburg residents, in an effort to ensure that the City's most vulnerable individuals and families get the legal help they need to prevent homelessness. The ability to focus attention on Fitchburg allows CLA to identify systemic issues that affect many more tenants than just our clients. Other cases involve housing that is in dire need of repair. CLA is able to assert legal claims that result in improvement to housing conditions, which has the effect of making the unit more livable for the tenant and also increases the quality of the community's housing stock. Landlords in eviction cases are often represented by an attorney, making representation of tenants all the more critical. This is particularly the case in central Massachusetts. In the Central Division of the Housing Court, only 8.6 percent of tenants were represented, compared to 75 percent of landlords. This demonstrates the continued crucial need for our services among tenants, as the percentage of represented landlords has grown since 2018 (when 66% were represented).</p>
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	<p>In 2018, in the Central Division of the Housing Court, 93.2% of tenants were underrepresented, compared to 33.4% of landlords.</p>
	<b>Location Description</b>	City of Fitchburg
	<b>Planned Activities</b>	<p>CLA will also take on cases related to housing that is in need of repair; CLA is able to assert legal claims that result in improvement to housing conditions, making the unit more livable for the tenant, and increases the quality of the City's housing stock. Funding will support part of a Staff Attorney and the Senior Supervising Attorney</p>
18	<b>Project Name</b>	Project Learn STEAM Transportation
	<b>Target Area</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Public Services

	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$14,864
	<b>Description</b>	Program funds will be used to provide one-way transportation from Fitchburg schools to the Boys and Girls Club Afterschool Program located at 365 Lindell Street in Leominster.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that approximately 1,440 transportation trips will be provided and 300 Fitchburg youth (unduplicated) served.
	<b>Location Description</b>	City of Fitchburg
	<b>Planned Activities</b>	The Fitchburg schools involved in the program will include: Memorial, South Street, Reingold, Crocker, McKay, Longsjo, Sizer, and Fitchburg High School.
19	<b>Project Name</b>	Small Business Financial Assistance
	<b>Target Area</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Economic Development
	<b>Needs Addressed</b>	Economic Development
	<b>Funding</b>	CDBG: \$51,156
	<b>Description</b>	Project funds will be used to support new and expanding small businesses through loans and grants. Funds may also be available to commercial property owners to remove architectural barriers to accessibility where businesses exist or are opening. This funding includes \$11,000 of Business revolving loan funding.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	City of Fitchburg
	<b>Planned Activities</b>	
	<b>Project Name</b>	Sign and Facade Program

20	<b>Target Area</b>	CDBGTarget Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Economic Development
	<b>Needs Addressed</b>	Economic Development
	<b>Funding</b>	CDBG: \$55,806
	<b>Description</b>	The City will be working with downtown property owners and code officials to eliminate blighting signage, broken windows, graffiti, and other blighting factors of downtown. This will allow the City to provide an incentive for business owners to replace signs and create a more attractive storefront within consistent design standards.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	City of Fitchburg
21	<b>Planned Activities</b>	The program will be one tool of many in the City and downtown's economic development toolbox. This program will leverage other work as a part of the agreement. Business owners will be responsible for some match funding or in-kind improvements. Part of the assistance will include professional sign design using the City's updated design standards.
	<b>Project Name</b>	Fitchburg Downtown Coordinator
	<b>Target Area</b>	CDBGTarget Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Economic Development
	<b>Needs Addressed</b>	Economic Development
	<b>Funding</b>	CDBG: \$32,554
	<b>Description</b>	Program funds will be used to support the salary of the Downtown Coordinator, who will assist in planning and coordinating Main Street projects and special events; assist in the development of a shared brand strategy for Downtown Fitchburg as both a college town and arts and culture destination.
	<b>Target Date</b>	6/30/2023

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	City of Fitchburg
	<b>Planned Activities</b>	This position will spend significant time on supporting microenterprises in the downtown and will work with Fitchburg State University.
<b>22</b>	<b>Project Name</b>	homeowner repair- rehab & preservation owner & tenant units
	<b>Target Area</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Rehabilitation and Preservation
	<b>Needs Addressed</b>	Rehabilitation and Preservation
	<b>Funding</b>	CDBG: \$170,000 HOME: \$500,000
	<b>Description</b>	funding for homeowner rehabilitation, including full rehabilitation of homeowner units with HOME funds, strategic rehab of homeowner units with Revolving CDBG funds and rehabilitation of rental units in owner occupied properties with revolving CDBG funds
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The program anticipates assisting low-moderate income households, and estimates at least two of the households will be seniors.
	<b>Location Description</b>	Program will be available to income-eligible owner-occupied households throughout Fitchburg, but focused on the housing strategy area.
	<b>Planned Activities</b>	The homeowner repair program anticipates assisting 8 homeowners with full rehabilitation, 3 additional homeowners with strategic repair, and 2 tenants in owner-occupied housing with full rehabilitation. The program anticipates assisting low-moderate income households, and estimates at least two of the households will be seniors.
<b>23</b>	<b>Project Name</b>	homebuyer acquisition
	<b>Target Area</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Rehabilitation and/or Acquisition
	<b>Needs Addressed</b>	Rehabilitation and/or Acquisition

	<b>Funding</b>	HOME: \$132,365
	<b>Description</b>	HOME funded downpayment assistance for newly developed affordable housing.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 4-6 low to moderate families will be assisted through this funded.
	<b>Location Description</b>	The two locations for proposed projects are both in the housing strategy area, however if not all funds are used, we may use these funds City Wide as long as the buyers are income eligible.
	<b>Planned Activities</b>	Provide downpayment assistance to recently developed new, or rehabilitated housing for homeownership.
24	<b>Project Name</b>	homebuyer development
	<b>Target Area</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Acq./Dev/Rehab by Non-profit Housing Providers
	<b>Needs Addressed</b>	Acq, Dev and Rehab by Nonprofit Housing Providers
	<b>Funding</b>	HOME: \$300,000
	<b>Description</b>	funds will be used to develop homeownership opportunities by creating new housing. This is likely to be developed by Habitat for Humanity.
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	We estimate between 2-4 low to moderate income families will be assisted through this housing development
	<b>Location Description</b>	Planned projects are located within the Housing Strategy area, however- should other opportunities arise with remaining funds- these projects can be anywhere in the City of Fitchburg.
	<b>Planned Activities</b>	Development of 2-4 units of new, energy efficient, homeownership for low to moderate income households, with Habitat for Humanity.
25	<b>Project Name</b>	rental development
	<b>Target Area</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide

	<b>Goals Supported</b>	Acq./Dev/Rehab by Non-profit Housing Providers
	<b>Needs Addressed</b>	Acq, Dev and Rehab by Nonprofit Housing Providers
	<b>Funding</b>	HOME: \$1,050,000
	<b>Description</b>	Development of new rental units by non-profit developers
	<b>Target Date</b>	7/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	We estimate very low, low, and moderate income households will benefit from this housing being developed in two projects. Five of the units assisted in the North Star Family Shelter Project will be specifically set aside for families living in shelter, ready to transition to permanent housing. The other five units to be funded will be in NewVue Communities Fitchburg Arts Community Rental Project and will have an "artist preference" but must otherwise meet the income requirements of the HOME program.
	<b>Location Description</b>	The North Star Family project (5) units will be on Marcello Ave in Leominster, MA. The NewVue Communities project will be at the former BF Brown school, at 188 Elm St. in Fitchburg- within the Housing Strategy area.
	<b>Planned Activities</b>	The North Star family project proposes to create 14 units of new construction family housing for families in their Shelter program, ready to move to permanent housing. The Fitchburg Arts Community Project proposed to convert a former school, BF Brown and two adjacent school buildings, the annex and the stables to 66 units of artist preferred housing.
26	<b>Project Name</b>	rental rehabilitation by non profits
	<b>Target Area</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Acq./Dev/Rehab by Non-profit Housing Providers
	<b>Needs Addressed</b>	Acq, Dev and Rehab by Nonprofit Housing Providers
	<b>Funding</b>	HOME: \$250,000
	<b>Description</b>	This project proposes to assist the Fitchburg Housing Authority with two rehabilitation projects. One, a long vacant single family home owned by the FHA- this will be rented to a household. The second is a rehabilitation of the Green Acres housing development built in the 1960s. One-two units will be funded in this overall project.
	<b>Target Date</b>	6/30/2024

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Three Low income families eligible for the Fitchburg Housing Authorities' public housing will be assisted through these projects
	<b>Location Description</b>	Both projects are on existing Fitchburg Housing Authority Property in the City of Fitchburg, one on Milk St. the Second at Green Acres on Normandy Rd.
	<b>Planned Activities</b>	The Fitchburg Housing Authority proposes to rehabilitate their Green Acres Village property, primarily with state funds. These are existing and occupied units in need of repairs- particularly around water mitigation and accessibility. The FHA also owns a long vacant, deteriorating single family home and proposes to rehabilitate this property as well.
27	<b>Project Name</b>	HOME Administration
	<b>Target Area</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	HOME Administration
	<b>Needs Addressed</b>	HOME Administration
	<b>Funding</b>	HOME: \$317,817
	<b>Description</b>	administration of the HOME program
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	27 Households qualifying as income eligible for HOME program assistance. This number incorporates all HOME funded activities reported in other projects. This number is duplicative of those numbers.
	<b>Location Description</b>	The City of Fitchburg and Leominster.
	<b>Planned Activities</b>	Administration of HOME funded activities.
28	<b>Project Name</b>	Housing Program Delivery
	<b>Target Area</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Rehabilitation and Preservation
	<b>Needs Addressed</b>	Rehabilitation and Preservation
	<b>Funding</b>	CDBG: \$70,000

	<b>Description</b>	This fund supplements HOME administration funds in order to deliver our Homeowner Rehabilitation Program.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	13 income eligible families, it is estimated at least two will be elderly. This number duplicates the number of homeowner and rental units assisted in the homeowner rehabilitation program project.
	<b>Location Description</b>	The City of Fitchburg and Housing Strategy area.
	<b>Planned Activities</b>	delivery of the homeowner rehabilitation program.

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

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

LMI and minority populations are concentrated within the CDBG Strategy Area, as seen in the map in the Market Analysis section of the 2022-2026 Consolidated Plan. According to the U.S Census, multiple census tracts in the Strategy Area exceed the 31.8 percent minority concentration threshold and the 52.7 percent LMI concentration threshold. Concentrations of minority racial and ethnic groups and LMI families overlap with areas in the jurisdiction where multiple housing problems exist, where most of the rental stock is located, and where the oldest and most urban neighborhoods are. These concentrations correspond to the CDBG Strategy Area, encompassing the Downtown and the surrounding census tracts. Concentrations of lower-income households and poverty and racial and ethnic minority households are used to inform the decision-making process when determining the geographic distribution of resources. Recommendations for eligible activities and uses of funds are made based on this information, and development is encouraged in these areas. Fitchburg continues to target its resources to address the needs of these communities. The City determines that the most effective method to address needs is through continued targeting of housing and community development activities and funding in the Strategy Area, including code enforcement and rehabilitation.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide	100

**Table 4 - Geographic Distribution**

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

Non-housing activities are targeted in the CDBG Strategy Area which comprises several older neighborhoods. These areas contain the highest concentrations of minority populations, substandard housing, aging infrastructure, and housing problems (as defined by HUD). According to the 2010 Census, LMI households comprise 71 percent of those in the CDBG Strategy Area, and LMI households comprise 52.7 percent of households citywide. HUD approval of the CDBG Strategy Area is based on 2010 U.S. Census. (Please note that Census 2020 results are not yet available at this time.) An updated estimate of LMI percentages based on American Community Survey (ACS) 2019 estimates is displayed in the Strategic Plan section of the 2022-2026 Consolidated Plan map. Housing activities are targeted in the Housing Strategy Area, which comprises older urban neighborhoods. The Housing Strategy Area is within census block groups identified as principally low- and moderate- income and containing housing that exhibits the greatest need for rehabilitation/repair activities. Home rehabilitation funds for homeowners are distributed to income-eligible beneficiaries based on application submissions. The City prioritizes development incentives, referrals, and technical assistance to property owners and developers in this

area to ensure the timely expenditure of funds and compliance with written agreement requirements.

Specific allocation priorities for the PY48 Annual Action Plan include those activities that focus on continuing the recovery from the COVID-19 pandemic. Eligible high-impact CDBG activities such as the Microenterprise Business Grant Program and small business technical assistance will have higher priority. A list of specific PY48 priorities by goal type is outlined below; each activity is consistent with the priority needs established in the 2022-2026 Consolidated Plan.

- Public Facility Improvements
- Public Services
- Economic Development
- Emergency Shelter Program
- Clearance Activity
- Rehabilitation and Preservation
- Rehabilitation and Acquisition
- Acquisition, Development, and Rehabilitation by Non-profit Housing Providers

## **Discussion**

HUD is allocating roughly \$1 million in CDBG funds and \$545,493 in HOME funds in PY48. There is also roughly \$1.7 million available in HOME ARP funds. Per HUD regulations, \$139,383 of the CDBG allocation is slated to public services and \$185,844 is slated to Administration and Planning; \$54,549.30 of the HOME allocation is slated to Administration and Planning. The City maintains a conservative approach to the usage of the Slum and Blight national objective, with the remainder of CDBG funds used directly to benefit LMI persons and residents of LMI areas.

## Affordable Housing

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

#### Introduction

The Fitchburg-Leominster HOME Consortium's goals for PY48 are to create new HOME units with a percentage of those units associated with the CHDO. The Consortium also plans to rehab/repair units and other assistance to households in the upcoming year. The Consortium estimates supporting twenty households via its one-year affordable housing goals in PY48.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	2
Non-Homeless	20
Special-Needs	0
Total	22

Table 5 - One Year Goals for Affordable Housing by Support Requirement

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	0
The Production of New Units	5
Rehab of Existing Units	20
Acquisition of Existing Units	0
Total	25

Table 6 - One Year Goals for Affordable Housing by Support Type

#### Discussion

The Consortium has a goal of creating five units of housing and rehabilitating 100 units by 2026. It is anticipated that fifteen rehabilitated units will be rental, and the remainder will be ownership/full rehabilitations. Elder households, qualifying as a special needs population, will receive assistance with their home. The total number of goals will be distributed over various public and private activities. Both cities will seek partnerships with CHDOs and non-profit affordable housing development organizations to meet these goals. The Director of Housing and Community Development evaluates effective ways to implement PY48 programs, aiming to stretch available dollars as much as possible to meet local needs. The City has redesigned the Homeowner Rehab program to assist with this, trying to help more beneficiaries while meeting program requirements. HOME Program staff will continue to work with the CoC to find opportunities to secure safe and affordable housing for the homeless and special needs populations. The Consortium and the City of Fitchburg's HOME and CDBG allocations have been reduced significantly over the past ten years, limiting the ability to complete more projects for owners, renters,

developers, and homeless/special needs populations.

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

### **Introduction**

The Fitchburg and Leominster Housing Authorities are the two housing authorities that provide public housing in the Consortium. Together, they manage 935 public housing units and 654 vouchers. Of those units and vouchers, 776 are in Fitchburg (255 vouchers and 521 units) and 813 are in Leominster (399 vouchers and 414 units). There are 643 elderly and non-elderly disabled units, and 292 family units. Various types of federal housing vouchers are offered to those in need, including Mobility Vouchers, Single Room Occupancy (SRO), and Section 8 Mod Rehab Vouchers.

Public and assisted housing is available in limited supply in the Consortium. The current inventory of units and vouchers is not enough to meet the demand for housing that is affordable to extremely low, very low, and low-income households (15,345 total households). The existing public housing stock is old, in need of maintenance/rehabilitation, and is limited in its ability to meet the needs of applicants.

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

PHAs submit their specific strategies for improving the living environment for LMI families in their five-year capital plans. These plans outline policies, programs, operations, and strategies for meeting local housing needs and goals. Within these plans, funding needs for capital improvements are outlined in the annual budget. Funding is usually unavailable to complete all the improvements outlined in the capital plans, with many singular improvements being very costly. Both cities' housing authorities continue to increase developments' security and lighting, physical improvements to the internal and external infrastructure, and accessibility upgrades. The needs of each development determine the prioritization of building updates. The LHA reported the following needs in their Capital Improvement Plan that they will be working on throughout PY48:

- Kitchen and bathroom repairs/renovations;
- Aesthetic improvements including carpet replacement and tree management;
- Exterior improvements including roofs, lighting, weatherization, wiring, and balconies;
- ADA accessible additions/improvements, including sidewalk curb replacement/repair; and
- Mechanical updates and installations.

Additionally, both Consortium PHA's continue to participate in actions that address social needs in public housing. These actions include updating their administrative plans and Eligibility and Admissions Policies and having staff participate in anti-discrimination training. Staff receives training in Rent Determination and Family Self-Sufficiency (FSS). Public housing staff receives training offered by the Massachusetts National Association of Housing and Redevelopment Officials (NAHRO) through the Public Housing Manager Certification Program. This training includes the application process, leasing and

lease enforcement, eviction, finances, and facilities management.

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

Both Authorities regularly work with the state and HUD to obtain additional funding for new opportunities for residents to be more involved in management and participate in homeownership. Each PHA pursues different community-based and program-based activities to involve their residents. These activities predominantly include public hearings and regular resident meetings. They are outlined in detail on the PHAs' websites, in their annual reports (if required to publish one), and in their PHA Plan (for non-qualifying PHAs). In Leominster, the HCV Federal Program offers a Family Self-Sufficiency Program that works with participants to save for a down-payment to purchase a home. In Fitchburg, the Housing Authority initiates a new ABLE program (A Better Life Experience) with its residents. Similar to the Family Self Sufficiency Program, it will work with participants to save for homeownership or business startups.

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

N/A

**Discussion**

The Consortium continues to work with PHAs to further affordable housing goals and serve those most in need of housing and specialized housing services, including LMI populations, the homeless, those at risk of homelessness, and non-homeless special-need populations. However, the current PHA housing stock is insufficient to satisfy community needs. Properly housing LMI households will require repairs to existing units and construction of new units. PHA units that need repairs or rehabilitation pose health, safety, and access issues for their tenants. While the PHAs and cities continue to seek alternative funding and resources, affordable housing production remains difficult to accomplish.

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

### **Introduction**

The City of Fitchburg is the lead reporting agent to HUD for all administrative functions related to the operation of the Fitchburg-Leominster HOME Consortium and Fitchburg's CDBG Program. Fitchburg also serves as the regional base for many state agencies, including the Departments of Mental Health, Children and Families, and Transitional Assistance. Because of this, the City administers most programs/services for the homeless and other special needs groups for the Consortium cities, including CDBG-supported programs and programs run by outside agencies. Emergency shelter, transitional housing, and permanent supportive housing services are expected to continue operating at their current locations in Fitchburg throughout PY48.

The HOME and CDBG programs work with the Worcester City and County CoC, public safety, the Council on Aging (COA), emergency shelters, and other agencies to carry out programs/services. Coordination of all programs and service-management related to affordable housing and human services has advanced the provision and availability of activities. While most homeless and other special needs agencies are designed to meet regional needs, many specialized programs are in Fitchburg.

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

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

The most recent PIT Counts confirm 169 reported chronically homeless, 320 people with severe mental illness, and 237 living with a chronic substance use disorder. More recent numbers published by CMHA reported 22 chronically homeless people, 16 adults with severe mental illness, and 21 suffering from substance abuse. There is a need for partnership between shelters and services to address chronic homelessness, as it is often the result of other problems. The Consortium has a goal of supporting a CoC that implements strategies like Housing First. Providers and public safety in the Consortium conduct on-street outreach to connect unsheltered/chronically homeless with shelter, services, and case management for benefits, housing placement, etc. Some CoC agencies have outreach programs, including Our Father's House. Staff are trained to assess and engage those who are resistant.

Our Father's House Inc implemented its outreach in 2010. The Street Outreach Team visits where the homeless stay and assess needs. Workers respond to calls for assistance from law enforcement, businesses, and citizens. The program offers referrals, crisis intervention, counseling, etc. to the unsheltered. Workers are equipped with food, clothing, hygiene supplies, etc. They are prepared to assist those with mental health issues, living with a substance use disorder, or who have other unmet service needs by coordinating services. The Outreach Team will refer people to appropriate locations. The Veterans Outreach Center serves veterans and their families, providing transitional and PSH.

Veterans, Inc. receives referrals and has several transitional and PSH sites across the state. A list of other providers conducting outreach is below:

- Our Father's House operates a mobile shower unit
- The YMCA of Central MA offers meals and showers with the North Central MA Faith Based Community Coalition
- Community Healthlink has an Outreach and Advocacy Program that offers screenings, assessments, counseling, rehabilitation, etc. Staff conduct outreach through shelters and emergency care. The program offers services such as 24-hour crisis assessment, intervention, and stabilization
- The Fitchburg Human Rights Commission advocates on behalf of the homeless and their individual needs
- LUK Inc. offers prevention, counseling, placement, and support for youth, adults and families. Placement programs assist at-risk/homeless youth as they transition, offering stabilization, case management, and crisis and behavior management
- According to staff, a new provider network began meeting in 2021 to fill in existing gaps in youth outreach.
- A temporary low-barrier shelter was established at the Day's Inn in Leominster to minimize risks caused by the pandemic.
- SMOC offers programs including affordable and transitional housing, mental and substance abuse treatment, case management, and childcare

Specific PY48 activities for reaching out to the homeless and assessing their needs through investment in the Street Homeless Invention Program. PY48 funding for Rehabilitation/Acquisition of Owner-Occupied and Rental Opportunities, and Acquisition, Development and Rehabilitation by Non-Profit Housing Providers will assist the homeless/other special needs populations secure stable, more PSH options transitioning out of homelessness.

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

The Consortium has one primary shelter for homeless individuals (Our Father's House) with 28 beds and two overflow/vouchers. Our Father's House coordinates with providers to assist shelter guests exiting homelessness via Rapid Rehousing funds from HUD and offers three Rapid Rehousing adult beds funded by state Emergency Solutions Grants (ESG) offered by Our Father's House. North Star Family Services (NSFS) operates the Consortium's primary emergency family shelter in Leominster, with a total bed count of 20. This shelter is a community living/group environment with daily meals and groceries. The YWCA of Central Mass offers emergency shelter, transitional housing, and case management for victims of domestic violence (including children) and those at-risk of homelessness. The short-term housing program provides access to safe, affordable dormitory-style living quarters for two months up to two years; they offer two family beds and five adult-only beds. Lastly, LUK, Inc.'s Crisis Center in Fitchburg

offers emergency and transitional beds for youths, plus scattered sites facilities.

Fitchburg contains the majority of transitional housing in the Consortium. Our Father's House manages a family transitional housing program called Transitions at Devens. This program is for homeless families headed by single women/mothers. There are thirteen units and seven scattered-site apartments in Fitchburg where each family can stay for up to four months while receiving case management services through MOC. Our Father's House also manages the Elizabeth House in Fitchburg, which provides transitional housing and case management to homeless women in recovery. Elizabeth House has twelve adult-only beds. LUK Inc. in Fitchburg has a transitional housing maternity program with twenty adult beds and a separate transitional housing facility with nine beds – eight adult beds and one children's bed. Jeffrey's House, composed of two sober houses for men and women in recovery, is also located in Fitchburg. For veterans transitioning from/exiting homelessness, the Veteran Homestead, Armistice Homestead, and the Hero Homestead. Veterans Homestead houses up to twelve residents in a mix of single and double rooms and is for veterans living with medical and substance diagnoses. Armistice Homestead (Leominster) is a transitional housing facility that provides housing for sick and elderly veterans, or veterans with substance use disorder, mental illness, or medical issues. The Hero Homestead is a transitional sober living environment assisting veterans in setting and meeting goals to aid them in successful reintegration back into the community.

The CoC's focus is using a Housing First model, especially for the chronically homeless. CoC efforts also include providing emergency shelter and transitional housing, so while expanding the capacity of current shelters is a priority, allocation of limited resources leaves little room for expansion. The local emergency assistance shelters and transitional housing programs continue to participate in the CoC's Homeless Management Information System (HMIS), where client-level demographic data, assessments, numbers/configurations of beds, and current openings/availability are tracked. Both Consortium communities will continue to pursue activities to address the emergency shelter and transitional housing needs of homeless/chronically homeless individuals and families through CDBG funding where applicable.

*A complete list of facilities with comprehensive unit and bed counts is in section MA-30 of the Consolidated Plan.*

**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**

Partnerships facilitate homeless transitioning to independent living and permanent housing, preventing reoccurrences of homelessness. Partners have accomplished goals via ESG, RAFT, and Homebase funding. Certain providers receive Rapid Rehousing funds and funding for transitional and PSH. Rental subsidies, including vouchers prioritize chronically homeless. Several facilities specialize in shortening homelessness, facilitating housing access, and preventing those recently homeless from becoming homeless again. Others include:

- NSTS is working on a PSH project to help homeless persons entering independent living, in addition to outreach and shelter. LUK Inc. operates young adult Rapid Rehousing with 4 family beds and 3 adult beds through their Stabilization and Rapid Reintegration (STARR) Programs. They also have a shelter, transitional living programs, maternity group home programs, and TIL apartments
- Our Father's House operates the West Street Sober House, providing permanent housing to men in recovery
- SMOC operates scattered-site housing, a shelter, Leighton Street, Harmony House, and Hastings Hall. Leighton Street is a PSH facility for adults in recovery. Harmony House is PSH for men, and Hastings Hall is permanent adult SRO housing.
- The Fitchburg Veterans Service Office provides shelter, housing, and referrals. The City will refer individuals to the SHARP program. SHARP is a collaboration between DVS and the VA to end veterans' homelessness through peer support, mental health services, etc. The program sets clients up for long-term rehabilitation through HUD-VASH. The Fitchburg VA Office has an outpatient clinic.
- DTA's Fitchburg office offers cash assistance, benefits, Food Stamps/SNAP, emergency aid to elders/the disabled/children, and transitional aid to families. DTA provides shelter and emergency services to LMI families and homeless pregnant women.
- MOC offers services to homeless families in need of permanent housing, childcare, and employment. They follow up shelter to make sure they maintain their housing. MOC offers a Care AIDS Services Supportive Housing Program for the homeless living with HIV/AIDS and their families.
- Fitchburg/Leominster Public Schools have staff responsible for coordinating services for homeless students and their families
- The CoC, Community Foundation providers, City Councilors, state reps, and senators have initiated a Housing First working group to increase non-congregate housing for single individuals

The CoC administers CES to link households with housing, shelter, and services. The CES has access points for assessments/referrals. Certain points specialize in particular populations, but the CES follows No Wrong Door. No Wrong Door's policy is that no one will be denied. The homeless can present at any provider and access the CES at 40+ organizations. CMHA, the CES Lead, outreaches to agencies before bi-monthly Working Group meetings. Entry points ensure access for: adults with and without children;

unaccompanied youth; veterans; young adults; households fleeing/attempting to flee DV; or persons at risk of homelessness. CoC's focus on these priority populations for PSH:

- Chronically homeless with the severe needs and long histories
- Homeless with a disability, service needs, long periods of homelessness; and coming from places not meant for habitation

**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.**

Most of the funding discussed addresses homelessness and those at risk of becoming homeless. The Community Development Departments in Fitchburg and Leominster direct their CDBG programs (Fitchburg directs the HOME programs), facilitating program coordination for an all-encompassing view of needs for LMI individuals and families. Staff meetings provide opportunities to discuss needs in-depth. The following activities aid in the prevention of LMI individuals and families with children from becoming homeless:

- All HOME program activities;
- CDBG support to providers that serve low-income and underserved families;
- CDBG support to agencies such as Leominster's Spanish American Center that provide information, referral, and translation services to the Latino population;
- CDBG support to housing rehabilitation/repair, code enforcement, critical home repair, preservation, and development programs;
- CDBG support for homelessness prevention and emergency shelter programs; and
- CDBG and HOME support for administration and planning to continue these programs.

HUD introduced the housing grant project called "DedicatedPLUS" to provide CoC's with the flexibility to serve vulnerable populations and immediately address the needs of persons experiencing chronic homelessness, those at-risk, and those who have become homeless after struggles with chronic homelessness. HUD encourages CoC's to adopt prioritization standards based on the length of time a program participant resided on the streets, in an emergency shelter, or a safe haven, along with the severity of their service needs. Prioritization standards help applicants apply for new PSH projects under the DedicatedPLUS category.

The CoC partners with a McKinney-Vento School Liaison in the Fitchburg Public Schools. There is also a regional liaison for Central Massachusetts. Liaisons identify unaccompanied homeless youth and offer them housing and stabilization. The McKinney-Vento Program also offers assistance with school

supplies, backpacks, field trip payments, school pictures, and more. Provider organizations in the CoC, such as MOC and LUK Inc., work closely to get homeless children access to the services they need to succeed. NSFS has temporary housing assistance, assistance locating permanent housing, and daycare assistance as an alternative to shelters, so children can continue with school and adults can pursue job training.

The Consortium's Housing Authorities seek voucher opportunities for eligible disabled, elderly, or otherwise vulnerable tenants. People with disabilities who are leaving institutions are paired with community-based services to increase the likelihood of a successful housing placement and stability. In such cases, the PHAs prioritize these individuals on their waiting lists. As mandated by the state, an individual/family is provided with an Emergency Application and if approved, is moved to the front of the waiting list.

## **Discussion**

The CoC is a collaborative effort between local government, social service providers, housing agencies, faith-based organizations, the business community, and individuals. The Consortium consulted with CoC agencies and partners when preparing sections of the 2022-2026 Consolidated Plan and PY48 AAP that describe homelessness strategies and available resources (particularly for chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth). The coordination of programs under the HOME and CDBG helps provide a detailed overview of needs in both cities.

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

### Introduction

Barriers to affordable housing identified during the CPP process and the Market Analysis are specific to Fitchburg's market and demographic makeup. The housing market in Fitchburg is constrained due to the old age and limited availability of affordable units, as well as a large number of unsafe, vacant, abandoned, and foreclosed properties. Older housing is more expensive due to higher heating and maintenance costs, and unsafe housing is expensive to rehabilitate. These realities, coupled with slower economic recovery and slower growth rates compared to the rest of the state, continue to restrict housing supply in the face of growing demand. Over the past five years, the market has improved, as evidenced by increased activity and rising sales prices. However, Fitchburg remains unaffordable for those considered very-low and extremely low-income, as seen in the cost-burden data. The demographic makeup of the City shows that there are relatively high percentages of renters, younger households, non-family households, and elderly households. These household types typically have lower incomes and are more likely to be cost-burdened. If housing demand is expected to increase, this may result in upward pressure on housing prices and increased unaffordability for these groups and LMI populations. If prices continue to rise but incomes remain stagnant, then affordability declines. Fitchburg needs employment opportunities that pay livable wages at each skill level to bolster household wealth and prevent drastic affordability gaps. According to the Metropolitan Area Planning Council (MAPC)'s Housing Market analysis for Fitchburg, households at less than 50 percent AMI, 50 to 80 percent AMI, and above 80 percent AMI face affordability gaps of 160, -1600, and 1500, respectively. The City continues to invest federal and state funding for technical assistance, workforce development, and other initiatives recommended in prior planning efforts to reduce these gaps, strengthen the local economy, and provide much-needed jobs.

### **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**

Fitchburg understands that given existing conditions, it would not be in the City's best interest to impede affordable housing and residential investment in its LMI neighborhoods. The Consortium and the City continue to pursue resources that encourage the development of affordable rental and homeownership opportunities. The Consortium has outlined the following additional barriers to affordable housing development that it will continue to monitor, research, and work toward improving

in the future, to optimize programming and funding distribution:

- Community Opposition and NIMBYism
- Land Use Policies
- Public Infrastructure
- Limited Transportation
- Resource Allocation

Policies that remove barriers to affordable housing in the Consortium include:

- Fitchburg's allows 2-families by-right in the RB and RC districts, and by Special Permit in the CBD, NBD, C, and FSU districts. Multifamily housing is allowed by Special Permit in the RB, RC, CBD, NBD, C, and FSU districts. PUDs and Flexible Development, allowed by Special Permit in all 12 zoning districts, permit higher density and flexibility. Fitchburg's permits 2 manufactured home parks. Leominster allows apartment/multifamily by Special Permit in the RB, RC, BA, BB, MU2, and V Districts. Site Plan Approval is required.
- Fitchburg and Leominster support inclusionary zoning in development projects, particularly new developments and in Downtown. Fitchburg has adopted a Smart Growth District in the Downtown that requires 20% affordability.
- Fitchburg allows ADUs by right in their RR and RA districts and by Boards of Appeals Special Permit in the RB district. Development of residential units by-right on the upper floors of Main Street is allowed. Leominster allows Accessory Apartments by Special Permit in the RR, RA, RB, and RC districts
- Leominster has a Downtown Overlay District, a Mechanic Street Overlay District, and the Urban Corridor Overlay District. Fitchburg has a Planned Development District, a Priority Development Site Overlay District, and a Smart Growth Overlay District that promotes housing via mixed-use and conversion.
- MA has Housing Choice, which rewards municipalities for producing new units beyond a threshold. There is also legislation on financing production/preservation of housing for LMI residents. The Governor recently changed the threshold for boards to approve bylaw changes to a simple majority.
- Fitchburg's 40R districts require 20% affordability in developments. DHCD published a design standard guidebook for the program. Fitchburg currently has two approved 40R districts, and Leominster has none
- Chapter 40B is a state statute that enables local Zoning Boards of Appeals (ZBAs) to approve affordable housing developments under more flexible rules if at least 20-25% of the

units have long-term affordability restrictions.

## **Discussion**

The Consortium has commissioned planning efforts that establish affordable housing goals and strategies and implement policies to eliminate investment barriers in LMI neighborhoods. Both cities recognize the shortage of affordable housing is more than a supply-and-demand issue. Other factors, such as market limitations, play a large role. Both cities will continue to pursue public and private funding to support affordable homeownership and rental opportunities by supporting ongoing planning and maintaining inclusive policies. Fees and policies in Consortium cities conform with standard practices across the Commonwealth.

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

### **Introduction**

The following section outlines how the HOME Consortium, specifically the City of Fitchburg, will overcome housing and service- related obstacles throughout PY48. This information can also be found throughout the 2022-2026 Consolidated Plan.

### **Actions planned to address obstacles to meeting underserved needs**

The City collaborates with local groups and agencies to carry out its anti-poverty strategy and maximize efforts to combat poverty. In addition to MOC, the YMCA, and local housing authorities, the Consortium works with the Community Reinvestment Act Coalition (CRA) for Central Massachusetts, NewVue Communities, and the CoC to accomplish this. Most activities are coordinated with other policies, programs (particularly the CDBG program), and expenditures. Staff partner with citizens, other departments, and the public/private sectors to coordinate federal and state funds for LMI families in poverty to improve quality of life. Currently funded CDBG and HOME programs that directly benefit households can mitigate the costs of critical home repair, code enforcement, lead abatement, self-sufficiency programs, case management, and health care activities. CDBG and HOME programs indirectly influence household finances by reducing other costs through affordable housing development, public facility and infrastructure improvements, counseling programs, and direct health care assistance. CDBG and HOME programs indirectly influence living expenses by reducing other costs through affordable housing development, public facility and infrastructure improvements, counseling programs, and direct health care assistance. The following activities are likely to be funded by CDBG and HOME throughout PY48:

- Housing rehabilitation, including emergency repair programs, energy efficiency improvements, and lead abatement;
- Childcare and youth programs;
- Public housing improvements;
- Infrastructure improvements and neighborhood revitalization;
- Mental and physical health services and case management, including substance abuse;
- Affordable rental and ownership housing acquisition, development, and rehabilitation; and
- Economic development initiatives that provide needed jobs and training for the workforce.

### **Actions planned to foster and maintain affordable housing**

Whenever possible, the Consortium will work with non-profits, its two CHDOs, banks, developers, and other stakeholders to develop and certify viable affordable housing projects throughout PY48. Coordination with local banks will focus on giving eligible homebuyers the ability to purchase a home and ensure that it will be subject to any needed repairs at the time of purchase. Coordination with developers will focus on developing new housing and the maintenance of the existing stock. The

Consortium advocates for mixed-income development and inclusionary zoning (a certain percentage of units within the development are affordable/workforce housing) and affordable development that is dense, mixed-use, and within proximity to services. Mitigation for the impacts of these developments usually comes in the form of a cash payment to be used by the municipality and other housing agencies to create affordable housing. Both Consortium cities are members of the local Community Reinvestment Act Coalition (CRA) for Central Massachusetts and work with the Coalition to further initiatives.

The Consortium will also work to foster and maintain affordable housing by:

#### Resource Allocation

The Consortium will advocate for a larger share of budgetary resources devoted to housing production, voucher programs, and social services at the state and federal level and funding for transitional housing, permanent supportive housing, and emergency shelter for those in poverty.

#### Policy and Programming

The Consortium will have programmatic requirements consistent with other public funders, especially DHCD. The Consortium will monitor eligible subrecipients receiving CDBG and HOME funds under contract with the Consortium for compliance, ensuring a track to success. Planning and Administration funds will be used for this purpose. The Consortium will also work with DHCD to develop ownership deed restrictions that survive foreclosure, satisfy HOME regulations, and enable units to be counted on the Subsidized Housing Inventory (SHI).

#### Land Use and Zoning Policies

The Consortium will publicize and advocate the adoption of inclusive affordable housing zoning/land-use bylaws, including the expansion of programs such as Chapter 40R. The Consortium will continue to support and implement the state's comprehensive permit law (Chapter 40, allows applicants in communities that have not achieved 10 percent affordable housing to receive waivers from local regulations if the project has at least 20-25 percent affordable units.

#### Staff Capacity

The Consortium will continue to promote planning efforts and studies with recommendations to promote affordable housing opportunities. The Consortium will also advocate for and seek out local resources to increase capacity for housing activities.

#### Public Education and Awareness

The Consortium will continue to educate the public on the need for and positive effects of affordable

housing in the region through its various activities and projects.

#### Development Capacity

The Consortium will continue to seek ways to increase local development capacity of non-profit and for-profit housing developers to increase affordable housing production.

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

The Consortium will vigorously enforce the lead-based paint regulations for all its program activities. It will continue to support the efforts of local organizations to attract lead paint removal resources.

Fitchburg has been taking steps to address lead-based paint hazards for several years. The City works with organizations to increase awareness of the dangers posed by lead paint by increasing code enforcement efforts and providing public funding to delead residential properties utilizing CDBG, HOME, and “Get the Lead Out” funding through the Massachusetts Housing Finance Agency.

The Massachusetts Childhood Lead Poisoning Prevention Program (CLPPP) was established to prevent, screen, diagnose, and treat lead poisoning. The local CAP agency, Making Opportunity Council (MOC), provides CLPPP funding, case management services, educational outreach, and maintains a website that lists apartments in Fitchburg and Leominster that have had lead inspections. The case management component is a closed referral program for families with children suffering from elevated lead levels. MOC also offers a Healthy Homes Case Management program. This program provides families with children under six with education and information regarding their homes' environmental health and safety issues.

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

The Consortium continues to follow a comprehensive approach to reducing the number of poverty-level families by investing CDBG resources to address homelessness, emergency shelter, transitional/supportive housing, youth services and development, mental health, substance abuse treatment, and job creation. These efforts supplement the dedication of HOME funds to LMI housing activities and encourage like-minded applicants to come forward. By implementing this AAP, the Consortium hopes to reduce the number of families with incomes at or below the poverty level, supporting the creation/expansion of affordable rental and ownership housing to decrease cost burdens and enable households to meet other households pressing needs.

While the Consortium’s programs and resources impact moving households out of poverty, other agencies have more targeted resources and specialize in addressing these issues. For example, DHCD offers holders of Section 8 vouchers in several PHA developments (Fitchburg Place, Ivory Keys, and the Yarn Hill apartments, to name a few) the opportunity to participate in the “Moving to Work” program. The program is designed to encourage voucher holders to become economically self-sufficient. As of PY47, CBDG funds FHA’s ABLE program. Another example is the YMCA of Central MA Montachusett

Branch, which offers financial assistance to community members, meal provision for the homeless, and financial assistance to families with children in Y Childcare. Both cities work closely with local food pantries, service providers, faith-based institutions, public safety, and other relevant groups to coordinate efforts and address the greatest needs concerning poverty-level families. The region's anti-poverty agency, Making Opportunity Count (MOC), has several programs and resources to reduce the number of poverty-level families in the Consortium:

- Family and children-based services ranging from childcare and Headstart, to the North Central WIC (Women, Infants, Children) Supplemental Nutrition Program, Coordinated Family and Community Engagement, the Young Parent Program, and a Family Resource Center;
- Teen and youth programs including after school, summer camp, teen summer employment, bystander intervention, and sexuality education;
- Emergency services including supportive housing, family shelter placement and support, and supplemental rent/utility assistance;
- Healthy home services including lead poisoning prevention, weatherization, and heating system support;
- Economic stability programs such as financial literacy, tax preparation, the Secure Jobs Initiative; and
- Elderly services including home-delivered meals and group dining cafes.

PHAs must adhere to legislation outlined in Chapter 235 of the Acts of 2014, *An Act Relative to Housing Authorities*, including Local Housing Authority Mandatory Board Member Training, Performance Management Review (PMR) and participation in the Regional Capital Assistance Team (RCAT) Program.

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

Fitchburg has administered federal HOME funds for the Consortium since the adoption of the program in the 1990s, providing a comprehensive approach to identifying priorities and delivering services. The institutional structure for managing funds integrates key organizations to overcome gaps. To meet goals and priorities, funding recipients use services/resources from other agencies, private lenders, non-profits, and for-profits. Federal, state, and local agencies provide a portion of gap funding to support affordable housing and community development. They guide these activities through policies, program guidelines, and direct provision of housing units, vouchers, and services (PHAs). The City acts as the "investor" of the housing/community development service. Due to the high costs of construction and a small funding allocation, co-funding from multiple sources is required to address priority needs. Developers and service providers, in turn, develop projects/activities, offer supportive services, monitor ongoing activities, and influence the type of affordable housing built or services offered. Private lenders and banks also play an institutional role by providing financing and delivering mortgage services to investors. This relationship ultimately forms the basis of the delivery system. Major coordination is carried out by organizations receiving funds through the Consortium, with the City providing

coordination and support to leverage/manage resources where needed.

Fitchburg also maintains a comprehensive annual allocation process for CDBG activities that meet priority needs and address gaps in the institutional delivery system. The CDBG application notice is mailed to approximately 100 service providers/individuals who have requested to be on the mailing list. Additionally, at least three CDBG meetings are held throughout the allocation process to collect information about community and housing needs, assist in the application process, and report on annual program funding. Community Development staff also participate in other community meetings including the Worcester County CoC Coalition, Community Reinvestment Act Coalition, the Twin Cities Rail Trail Committee, the Greenways Committee, Neighborhood Improvement through Code Enforcement (NICE), Reimagine North of Main Street Initiative, Fitchburg Housing Coalition, Community Health Network of North Central Massachusetts (CHNA9), Montachusett Regional Trails Coalition, and Project Clean- Up Fitchburg. The Community Development Department also collaborates with the Fitchburg and Leominster Housing Authorities.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

Entities in the Consortium meet to discuss issues related to housing and social services. Fitchburg and Leominster work together on investments and strategies for the HOME program. Both cities are members of the North Central MA CRA Coalition, which includes financial institutions, nonprofits, and other partners. Members work with credit and banking institutions on housing for LMI residents. As the lead Consortium community, Fitchburg is a member of the Worcester CoC. The North Central MA CRA Coalition receives HUD funds and coordinates services within the CoC, helping improve delivery and distribution to areas of need. The CD Deptt. consults with CoC partners, committees, etc. to coordinate and leverage resources. Fitchburg and Leominster foster coordination between providers and private and governmental health, mental health, and service agencies. The cities:

- Host annual meetings with agencies during AAP development. The meetings consist of information-sharing, gathering input on needs, and learning about programs
- Visit agencies for monitoring to assess whether programs are expending funds promptly and following grant requirements
- Serve as a clearinghouse and contact for program information, assistance, and materials

Both cities have needs for health, housing, and social services, verified in the surveys and focus groups. Agencies reported affordable housing and access to services are top among LMI and ESL populations. Most providers are self-sufficient but the CD Department coordinates with them on community development. Fitchburg works with providers, agencies, and health providers to improve quality of life. The CD Coordinator participates in meetings, provides technical assistance, and coordinates information. The CD and Planning Dept. is updated on resources used to assist those in need. Staff educate leadership and advocate for changes. They work with boards, commissions, etc. to connect

work and achieve goals. The Health Dept, Building Comm, Police, Fire , Mayor's Office, CD and Planning Department, Treasurer's Office, and Solicitor collaborate on the Problem Property Task Force meetings to discuss solutions. Many housing projects work with nonprofits to assist residents. They are connected and are often members of committees. For example, FHA offers wellness programs and social opportunities at their properties. The Daniel Heights Tenant Association works with the community on initiatives. FHA partners with the MOC for heating upgrades and weatherization programs.

## **Discussion**

The Consortium coordinates federal and state funds for LMI families/individuals and advances efforts to reduce the number of people in poverty by improving their overall quality of life through affordable housing and service provision. The Consortium undertakes activities in coordination with other policies, programs, and expenditures, especially the CDBG program. Consortium staff also work with citizens, departments, and the public and private sectors to eliminate barriers to affordable housing, address obstacles to meeting underserved need, and develop the institutional structure. These actions address the priority needs and goals identified in the 2022-2026 Strategic Plan.

## Program Specific Requirements

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

#### Introduction

The Fitchburg-Leominster Consortium's Programs and Policies are attached in the unique appendices.

This year 1 action plan includes very robust funding of housing programs as it includes significant prior year HOME resources and program income. This is primarily due to project slow down related to the pandemic. This does provide the PJ with an opportunity to provide increased levels of funding to upcoming projects and allows the homeowner repair program to take on some projects that need significant remedial work.

During this year, the program is allocating \$500,000 in HOME funds to homeowner repair, as well as \$170,000 in CDBG revolving housing funds for tenant repairs in owner occupied homes.

The PJ has committed \$600,000 in HOME funds to fill the remaining gap for the BF brown school conversion to housing, - the Fitchburg Arts Community Project. This housing will create 67 units of affordable housing for income eligible households and will have an artist preference. We anticipate construction to finally begin during this program year.

The PJ has committed \$450,000 to North Star Family Shelter's permanent supportive housing project. This is an increase of a prior year commitment. This project will provide 14 units of supportive permanent housing to stabilized families ready to leave the family shelter. This project is still seeking state funding and is not likely to start construction this year.

\$100,000 of HOME funds have been committed to the Fitchburg Housing Authorities Green Acres rental rehab project. This property, originally funded with DHCD funds, is still not ready to fund, the project will primarily remediate rental housing that has significant water issues in the basements. The City waits for DHCD to finish their architectural designs, etc.

\$150,000 of HOME funds have also been committed to the rehabilitation of Fitchburg Housing Authorities 171 Milk Street property. This property, also originally a state funded project, is a gut rehabilitation of a long vacant single family home that will be utilized as a rental unit for a large family.

The PJ has also earmarked \$432,365 in HOME funds for homeownership development, rehab and down payment assistance. The City is currently selling through RFP, two adjacent buildable lots on Taft Street, with requirements that the successful bidder be a non-profit creating at least two units of homeownership, we have allocated \$300,000 presuming the successful bidder is a reputable, experienced developer whom the City can provide HOME funding to. We've also allocated \$72,365 in reserve to a potential NewVue Communities Project rehabbing a long vacant, blighted property at 4 Upton St. This project will soon be under construction through a program called Liabilities to

Assets. Although NewVue has not yet requested funds, we anticipate they will need to request additional funds when bids come in. Lastly, we've allocated \$60,000 in HOME funds to provide down payment assistance to the buyers of these new homeownership developments.

The PJ has \$317,817 in HOME admin available for its use. This is good timing as we anticipate needing additional HOME admin funding for the purchase of project software to assist us in managing projects more efficiently.

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

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

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

**Other CDBG Requirements**

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	95.00%

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

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

The Consortium has no plans to invest HOME funds in any form other than those described in the

HOME Program Description. The principal proposed use of HOME funds (low interest or deferred loans to support new homeownership, existing homeowner or rental projects) is described in the HOME Program Description in the Attachment section of this Plan.

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

The Consortium does not resell properties in any of its housing programs except when partnering with DHCD to be consistent with requirements. The Recapture Guidelines can be found in the HOME Program Description in the Attachment section of this Plan.

3. 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:

Resale and Recapture Guidelines are contained in the HOME Program Description and in the HOME Program Promissory Note and Affordability Restriction.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The Consortium does not intend to use HOME funds to refinance existing debt secured by multifamily housing being rehabilitated with HOME funds.

ADDI: The Consortium is not a recipient of the HUD American Dream Downpayment Initiative.

The Consortium anticipates assisting several existing minority households with homeownership through the Housing Rehabilitation Program, as well as new minority households during PY48.

LMI Benefit: the total amount of CDBG funds distributed is \$4,646,100. Less the dollar amount to be spent on Planning and Administration and there are no Slums and Blight activities, \$3,252,270 will be for activities that directly benefit persons of low/moderate income and benefit residents in low/moderate income areas. The LMI total includes Entitlement funds, anticipated program income, and unspent/reprogrammed prior year funds. Funds are also available in the form of program income for Housing and Business Revolving Loan Fund activities at the start of PY48. Income from the Housing and Business Revolving Loan Fund is also anticipated during the program year. These funds are programmed for housing and business loan pools.

## **Expected Resources**

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

#### **Introduction**

The Consolidated Plan and the PY48 Annual Action Plan activities are funded by CDBG and HOME allocations and program income from the CDBG program. The anticipated resources available for activities over the upcoming five years are listed below. The City anticipates receiving approximately \$444,829 in annual allocation between 2022 and 2026. The numbers for the remaining four years of the Consolidated Plan are estimates only. This funding of roughly \$2,224,145 will support affordable housing, economic development, public services, and other previously listed priorities across the City and in the target area over the next five years. Depending on feasibility, money may be allocated to other programs in future years. Since 2010, the Consortium has seen a 24 percent decrease in HOME Entitlement funding and an 18 percent decrease in CDBG Entitlement funding. The Consortium maximizes the impact of its funds by encouraging partners/projects to leverage additional dollars and by enabling proposed projects to leverage non-federal resources in addition to HOME/CDBG funds. Other

grants secured by the City are used to forward the goals outlined in this Strategic Plan.

## Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	444,829	50,000	135,000	629,829	1,779,316	Numbers are estimates for the remaining four years of the Con Plan. Funds are expected to be allocated from annual allocation as follows: 20% for Administration; 15% reserved for public services (not to exceed).

Table 7 - Expected Resources – Priority Table

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

CDBG leverages resources via the following activities:

- CDBG funds are used in coordination with state funding such as MassWorks from the Massachusetts Executive Office of Housing and Economic Development (EOHED). For example, a MassWorks grant covered infrastructure improvements to Whitney Field. Through the grant, Leominster upgraded old water and sewer pipes in one of its largest commercial districts. In addition, the \$2,487,000 grant included new sidewalks, fencing, paving, ADA ramps and a retaining wall. These improvements directly affected private development in the area, including expanding the 774,000 ft<sup>2</sup> mall on-site.
- As a Gateway City, Leominster participates in the Economic Development Incentive Program (EDIP). The program provides affordable options for growing companies and offers tax incentives for those choosing Leominster as a home base. The incentives apply to various EDIP projects for registered manufacturers.
- Leominster also partakes in the state's Housing Development Incentive Program. The program expands the diversity of the housing stock, supports economic development, and promotes

neighborhood stabilization in the target area. In addition, tax incentives are provided to private property owners of multi-family housing for market-rate units.

- Department of Public Works, Parks and Recreations, Community Development, and other City staff continue to apply for CDBG funding or programs, matching those funds with the departmental budget, the general fund, and other sources where possible.

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

Leominster may use publicly-owned land or property to address the needs identified in this plan. Some examples include infrastructure projects on public sidewalks and streets in the target area, based on funding availability. Public recreation sites and facilities often receive CDBG funding for the Recreation Department's summer youth programs. Another example is regular funding for the Leominster State Pool during the summer. The Allencrest Apartments Complex, managed by the Leominster Housing Authority (LHA), offers the Allencrest Learning Center; the Center is part of a partnership between the School Department and the LHA. High school students participate in a tutor/mentor program there to assist other students. The Center is an ongoing recipient of CDBG public services funding. Lastly, the City continues to allocate funding for playground and property improvements at the Louis Charpentier Playground in the Comb & Carriage District. The area is a densely populated low-income neighborhood that has been historically underserved.

## **Discussion**

The City actively seeks opportunities to match federal funds with local and state funding opportunities for various community development initiatives. According to HUD regulations, the Consortium continues to allocate 10 percent of its HOME Entitlement to Administration and Planning and 15 percent to its CHDO set aside. The remaining 75 percent is for the variety of homeowner/rental assistance projects outlined in the Priority Needs (SP-25) and Goals (SP-45) sections of the Consolidated Plan. The City continues to allocate the maximum 15 percent of its CDBG allocation to public services and the required 20 percent to Administration and Planning.

## Annual Goals and Objectives

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

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Increase Affordable Housing Opportunities	2022	2026	Affordable Housing	Comb & Carriage Core Area	Affordable Housing Code Enforcement		Homeowner Housing Rehabilitated: 10 Household Housing Unit Housing Code Enforcement/ Foreclosed Property Care: 700 Household Housing Unit
2	Provide Public Services	2022	2026	Non-Housing Community Development	Comb & Carriage Core Area	Public Services	CDBG: \$66,724	Public service activities other than Low/Moderate Income Housing Benefit: 450 Persons Assisted
3	Improve Public Facilities & Infrastructure	2022	2026	Non-Housing Community Development	Comb & Carriage Core Area	Public Facilities and Infrastructure	CDBG: \$481,898	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 600 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Provide Services for Special Needs Populations	2022	2026	Non-Homeless Special Needs	Comb & Carriage Core Area	Public Services	CDBG: \$66,724	Public service activities other than Low/Moderate Income Housing Benefit: 25 Persons Assisted
5	Assist Homeless Individuals & Families	2022	2026	Homeless	Comb & Carriage Core Area	Public Services Homeless Needs	CDBG: \$66,724	Public service activities other than Low/Moderate Income Housing Benefit: 50 Persons Assisted
6	Provide Services for Youth	2022	2026	Non-Housing Community Development	Comb & Carriage Core Area	Assistance for Youth	CDBG: \$66,724	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 200 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Assist the Elderly	2022	2026	Non-Homeless Special Needs	Comb & Carriage Core Area	Assistance for the Elderly and Frail Elderly	CDBG: \$548,622	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 20 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 250 Households Assisted
8	CDBG Planning & Administration	2022	2026	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	Comb & Carriage Core Area	CDBG Administration and Planning	CDBG: \$444,829	Other: 1 Other

**Table 8 – Goals Summary**

### Goal Descriptions

<b>1</b>	<b>Goal Name</b>	Increase Affordable Housing Opportunities
	<b>Goal Description</b>	To annually preserve, maintain and grow affordable housing, including units occupied by LMI renters and owners. Also, to revitalize neighborhoods and preserve the physical/financial viability of the affordable housing market via long-term housing options.
<b>2</b>	<b>Goal Name</b>	Provide Public Services
	<b>Goal Description</b>	To annually promote and expand public services for LMI individuals/families while working to eliminate issues by providing a variety of programs, including programs that offer housing services.
<b>3</b>	<b>Goal Name</b>	Improve Public Facilities & Infrastructure
	<b>Goal Description</b>	To annually promote the development, expansion, and improvement of infrastructure, particularly streets, sidewalks, street beautification, building upgrades, and park/recreation improvements via direct funding and leveraging other funding sources.
<b>4</b>	<b>Goal Name</b>	Provide Services for Special Needs Populations
	<b>Goal Description</b>	To annually promote services relating to homelessness, youth, the elderly, and other special needs and vulnerable populations. Working to eliminate issues through the provision of various service programs, including programs that offer housing services.
<b>5</b>	<b>Goal Name</b>	Assist Homeless Individuals & Families
	<b>Goal Description</b>	To annually reduce/eliminate individual and family homelessness by providing shelter and services.
<b>6</b>	<b>Goal Name</b>	Provide Services for Youth
	<b>Goal Description</b>	To annually promote services relating to the youth, including teens, elementary-aged children, middle-school-aged children, and preschool-aged children, working to eliminate issues through the provision of various CDBG programs
<b>7</b>	<b>Goal Name</b>	Assist the Elderly
	<b>Goal Description</b>	To annually promote services relating to the elderly, frail, elderly, and seniors. Working to eliminate issues through the provision of a variety of CDBG programs.
<b>8</b>	<b>Goal Name</b>	CDBG Planning & Administration
	<b>Goal Description</b>	Administration of CDBG funds and planning activities that include grant writing to leverage other federal and state resources.



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

### Introduction

The City will dedicate its PY48 allocation to projects that support public infrastructure and facilities, assistance for youth, homelessness, and other critical goals and objectives. The CDBG programs PY48 allocation goes toward public services, economic development, and facilities/infrastructure, emphasizing activities to help businesses as the City continues to recover from the setbacks caused by COVID-19. Data analysis, as well as a community survey, focus groups, a homeless shelter survey, and a social service agency survey informed the selection of the projects in Table 26. Leominster also held an advertised public hearing to solicit comments about the Plan in conjunction with the City of Fitchburg. Information on how to participate was posted on social media channels and the City's website. Members of organizations representing low-income neighborhoods, minorities, the homeless, and other special needs populations were encouraged to participate via advertisements in the local print media (newspapers, etc.), public hearings, and the aforementioned surveys. Lastly, a draft of the 2022-2026 Consolidated Plan and PY48 AAP were posted on the City's website throughout the comment period. A final hearing was held before submission to HUD for approval. The impact of COVID-19 has been considered when compiling the projects list, with priority given to projects that remediate the issues it has caused. Given current events and CPP data, the activities below accurately address the priority needs and objectives identified in the Consolidated Plan. Each of the Citizen Participation Plan efforts and the feedback are in the Appendix.

Table 3 Project Information

#	Project Name
1	Public Services
2	Planning & Administration
3	Code Enforcement
4	Housing Rehabilitation
5	HUD Section 108 loan
6	DPW/ Sidewalks-Core Area
7	LHA/ Fire Project

Table 9 – Project Information

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

Data analysis, a community survey, focus groups, a homeless shelter survey, a social service agency survey, and meetings with City staff informed project selection. Further information was gleaned from an advertised public hearing, with comments received throughout the following 30 days. Information on how to provide feedback was posted on social media channels and the City's website. Members of organizations representing low-income neighborhoods, minorities, the homeless, and other special needs populations were encouraged to participate via advertisements in the local print media, public

hearings, and surveys. A draft of the 2022-2026 Consolidated Plan and PY48 AAP were posted on the Cityâ  s website throughout the comment period, and a final hearing was held before submission for HUD approval. The list in Table 26 was compiled within HUDâ  s grant parameters, with activities targeted in the Comb & Carriage Core Area to benefit those making 80 percent or less than the Area Median Income (AMI). The list also complies with national objectives, with at least 70 percent of activities benefitting LMI households. Housing activities are also targeted in this area, which comprises older urban neighborhoods and populations most in need. There must be 51 percent LMI occupancy for rental units in multifamily developments, and single families must be LMI.

The Consortium and the City of Leominster designate projects based on HUD's administrative and public service caps. Other than programmatic limitations of the grant requirements, the chief obstacles to addressing the underserved needs are a lack of funding/resources to provide more assistance. To overcome this, Leominster has a Grants Administrator to research and apply for available opportunities to supplement Entitlement funding.

## **AP-38 Project Summary**

### **Project Summary Information**

<b>1</b>	<b>Project Name</b>	Public Services
	<b>Target Area</b>	
	<b>Goals Supported</b>	Increase Affordable Housing Opportunities Provide Public Services Provide Services for Special Needs Populations Assist Homeless Individuals & Families Provide Services for Youth Assist the Elderly
	<b>Needs Addressed</b>	
	<b>Funding</b>	CDBG: \$66,724
	<b>Description</b>	Priorities may include continuing and expanding existing public services and assisting new services that serve the most vulnerable community members. Activities serving vulnerable populations, including the homeless, the elderly, extremely low income, and any other eligible activities providing services to LMI, and special needs populations will be prioritized in PY48.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>2</b>	<b>Project Name</b>	Planning & Administration
	<b>Target Area</b>	
	<b>Goals Supported</b>	CDBG Planning & Administration
	<b>Needs Addressed</b>	CDBG Administration and Planning
	<b>Funding</b>	CDBG: \$79,315
	<b>Description</b>	Project supports funding for a full time clerk and two stipend positions along with expenses
	<b>Target Date</b>	6/30/2023

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>3</b>	<b>Project Name</b>	Code Enforcement
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	Code Enforcement
	<b>Funding</b>	CDBG: \$108,775
	<b>Description</b>	Project funding for a Housing inspector for the core area along with expenses
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>4</b>	<b>Project Name</b>	Housing Rehabilitation
	<b>Target Area</b>	
	<b>Goals Supported</b>	Increase Affordable Housing Opportunities
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	CDBG: \$283,790
	<b>Description</b>	Project for 10 income eligible activities for housing rehab along with expenses and salary for a part time rehab specialist
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	

	<b>Planned Activities</b>	
<b>5</b>	<b>Project Name</b>	HUD Section 108 loan
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	
	<b>Funding</b>	CDBG: \$15,000
	<b>Description</b>	Project to repay every year of a 20 year loan for sidewalks
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>6</b>	<b>Project Name</b>	DPW/ Sidewalks-Core Area
	<b>Target Area</b>	
	<b>Goals Supported</b>	Improve Public Facilities & Infrastructure
	<b>Needs Addressed</b>	Public Facilities and Infrastructure
	<b>Funding</b>	CDBG: \$30,000
	<b>Description</b>	Project to use program income to do new sidewalks and apron in the core area at the Spanish American center in our core area
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>7</b>	<b>Project Name</b>	LHA/ Fire Project
	<b>Target Area</b>	
	<b>Goals Supported</b>	Improve Public Facilities & Infrastructure Assist the Elderly

<b>Needs Addressed</b>	Assistance for the Elderly and Frail Elderly
<b>Funding</b>	CDBG: \$68,000
<b>Description</b>	Project to support all new fire systems including panels, smokes and heat detectors in the towers downtown for the elderly and Laurie Drive units and Notre Dame units.
<b>Target Date</b>	6/30/2023
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
<b>Location Description</b>	
<b>Planned Activities</b>	

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

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

Concentrations of need are located in the Comb and Carriage Core Area. According to the U.S Census, multiple block groups in the area exceed the 51 percent LMI threshold. Minority racial and ethnic concentrations and LMI families overlap with areas where multiple housing problems exist, where most of the rental stock is located, and where the oldest and most urbanized neighborhoods are.

Concentrations of minorities, poverty, and lower-income households are used to inform decision-making when determining the geographic distribution of CDBG resources. Recommendations are made based on this information, and suitable developments are encouraged in these areas. The City of Leominster determined that the most effective way to address needs is by targeting housing and community development activities and funding in the Comb and Carriage Core Area. The Core Area is in the center of the City, stretching from along Route 2, southward through downtown and consists of eight of the nine block groups that are at least 51 percent LMI. Per HUD requirements, the City directs 100 percent of its CDBG funds to activities that benefit the LMI population, most of which reside in the Comb and Carriage Core Area. In PY48, the City proposes spending 25 percent of its funds on activities there.

The nine U.S. Census Block Groups that contain at least 51% LMI persons are:

- Block Group# 709100-3 ~ Percentage of LMI Persons: 64.9%
- Block Group# 709600-9 ~ Percentage of LMI Persons: 64.6%
- Block Group# 709201-2 ~ Percentage of LMI Persons: 62.3%
- Block Group# 709600-1 ~ Percentage of LMI Persons: 62.0%
- Block Group# 709400-2 ~ Percentage of LMI Persons: 61.0%
- Block Group# 709202-3 ~ Percentage of LMI Persons: 58.4%
- Block Group# 709400-1 ~ Percentage of LMI Persons: 57.2%
- Block Group# 709701-1 ~ Percentage of LMI Persons: 54.1%
- Block Group# 709600-2 ~ Percentage of LMI Persons: 52.9%

### **Geographic Distribution**

Target Area	Percentage of Funds
Comb & Carriage Core Area	25

**Table 10 - Geographic Distribution**

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

According to the 2010 Census, the highest percentages of LMI and minority populations are in the Comb and Carriage Core Area, consisting of eight of the nine block groups in Leominster that are at least 51

percent LMI. This, plus the limited funding and difficulty leveraging additional funds, has resulted in the City directing most CDBG resources to benefit residents in that area. HUD approval of the area is based on the 2010 U.S. Census numbers. Please note that the 2020 Census results have limited data available and were not fully completed by the time this report was submitted. An updated estimate of LMI percentages based on American Community Survey (ACS) five-year estimates (2019) is mapped in the Strategic Plan section of the 2022-2026 Consolidated Plan.

Based on application submissions, homeowner rehabilitation funds are distributed in the Core Area to income-eligible beneficiaries. Development incentives, referrals and technical assistance to property owners and developers are prioritized in this area, ensuring funds are expended in a timely, fair manner while meeting written agreement requirements.

Specific allocation priorities for the PY48 Annual Action Plan include those activities that focus on overcoming the hardships presented by the COVID-19 pandemic. Eligible and impactful CDBG activities will have the highest priority. A list of specific PY48 priorities by goal type is below; each consistent with the priority needs established in the 2022-2026 Consolidated Plan.

- Increases Affordable Housing Opportunities
- Improve Public Facilities & Infrastructure
- Provide Public Services
- Provide Services for Special Needs Populations
- Provide Services for Youth
- Assist the Elderly
- Increase Employment Opportunities
- Assist Homeless Individuals and Families
- Meet the Needs of Public Housing
- Planning and Administration

## **Discussion**

There will be \$444,829 in CDBG funds allocated in PY48. Per HUD regulations, \$66,724.35 of the CDBG allocation is dedicated to public services and \$88,965.80 is dedicated to Administration and Planning. The City uses the remainder of CDBG funds to benefit LMI persons directly and benefit residents in LMI areas.

Annual Action Plan  
2022

76

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

### **Introduction**

The following section outlines how the City of Leominster will overcome additional housing and service provision obstacles throughout PY48. This information is also found in the 2022-2026 Consolidated Plan.

### **Actions planned to address obstacles to meeting underserved needs**

The City collaborates with local groups/agencies to address the obstacles to meeting underserved needs. Collaboration is vital to overcome the challenges of decreasing funding and difficulty in leveraging alternative funding. In addition to MOC, the Leominster Housing Authority (LHA), and the Consortium's two CHDO's, the City works with groups such as the Community Reinvestment Act Coalition, the Spanish American Center, and North Star Family Services to accomplish this. The City undertakes most of these activities in coordination with other policies, programs, and expenditures, particularly the HOME program. City staff work in partnership with citizens, departments, and public/private sectors, coordinating funds for those in poverty to improve their quality of life. If the City becomes aware of an underserved need, the Mayor's Office and the Office of Planning and Development will determine how to meet the need with either existing resources or an outside funding source.

Current CDBG and HOME programs that directly influence household incomes include code enforcement, critical home repair, lead abatement, self-sufficiency programs, case management, and health care activities. CDBG and HOME programs indirectly influence living expenses by reducing other costs through affordable housing development, public facility and infrastructure improvements, counseling programs, and health care assistance. The following activities are likely to be funded by CDBG and HOME throughout PY48:

- Housing rehabilitation, including emergency repair programs, energy efficiency improvements,

- and lead abatement;
- Childcare and youth programs;
  - Public housing improvements;
  - Infrastructure improvements and neighborhood revitalization;
  - Affordable rental and ownership housing acquisition, development and rehabilitation; and
  - Economic development initiatives that provide needed jobs and training for the workforce.

### **Actions planned to foster and maintain affordable housing**

Whenever possible, the Consortium will work with nonprofits, its two CHDO's, banks, developers, and other stakeholders to develop and certify viable affordable housing projects throughout PY48.

Coordination with developers will focus on developing new housing and maintaining the existing stock. The Consortium advocates for mixed-income development/redevelopment (a certain percentage of units within the development are affordable/workforce housing) and affordable (re)development that is dense, mixed-use, and within proximity to services. Mitigation for these developments usually comes in the form of a cash payment used by the municipality and other housing agencies to create affordable housing. Leominster is a member of the local Community Reinvestment Act Coalition (CRA) for Central Massachusetts, working with the Coalition to further initiatives. As part of its CDBG Program, the City will continue its Housing Rehabilitation Program in PY48, providing suitable housing for LMI populations and preventing homelessness. Other methods that the Consortium will use to foster and maintain affordable housing throughout PY48 include:

#### **Resource Allocation**

The Consortium will advocate for a larger share of resources devoted to housing production, voucher programs, and social services at the state and federal level and funding for transitional housing, permanent supportive housing, and emergency shelter for those in poverty.

#### **Policy and Programming**

The Consortium will have programmatic requirements consistent with other public funders, especially DHCD. The Consortium will continue to contract with applicable parties to provide professional monitoring services of all developments for monitoring. The Consortium will also work with DHCD to develop ownership deed restrictions that survive foreclosure, satisfy HOME regulations, and enable units to be counted on the Subsidized Housing Inventory (SHI).

#### **Land Use and Zoning Policies**

The Consortium will advocate adopting inclusive affordable housing zoning/land use bylaws, including programs such as Chapter 40R. The Consortium will also continue to advocate for the state's comprehensive permit law (Chapter 40B), allowing applicants in communities that have not achieved 10 percent affordable housing to receive waivers from local regulations if the project has at least 20-25

percent affordable units.

#### Capacity

The Consortium will continue to promote planning efforts/studies with recommendations to promote affordable housing. The Consortium will also advocate for seeking out resources to increase capacity for housing activities.

#### Public Education and Awareness

The Consortium will continue to educate the public on the need for and the positive impact of affordable housing through various activities and projects.

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

The City of Leominster addresses lead-based paint hazards by increasing access to healthy, safe housing options. The City takes a proactive approach to addressing this issue, supplementing the existing efforts of the Consortium. Additional efforts by the City include:

- Leominster's Housing Rehabilitation Program utilizes CDBG to allow qualified homeowners to take out a 0% deferred payment loan to make necessary improvements to their homes. The funds are primarily used to repair/replace substandard housing conditions and make energy efficiency improvements but can also be used for lead abatement when necessary.
- The Board of Health has a Code Enforcement Officer. The position is funded by CDBG and focuses on inspecting housing in the Core Area, where there are higher percentages of LMI residents. The officer conducts lead paint determinations as part of code enforcement work, followed by de-leading units if found.
- The City enforces the Massachusetts Lead Law and all pertinent legislation in new residential construction, confirming all new affordable units are free of lead-based paint hazards. The Fitchburg-Leominster Consortium also vigorously enforces the lead-based paint regulations for all of its program activities and continues to support efforts of local organizations to attract lead paint removal resources.

The Massachusetts Childhood Lead Poisoning Prevention Program (CLPPP) was established to prevent, screen, diagnose, and treat lead poisoning. The local CAP agency, Making Opportunity Count (MOC), provides CLPPP funding, case management services, educational outreach and maintains a website that lists Fitchburg and Leominster apartments with a lead inspection. The case management component is a closed referral program for families with children having elevated lead levels. MOC also offers a Healthy Homes Case Management program that provides education and information for families with children

under 6 on environmental health and safety issues in their homes.

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

Recognizing that current resources are inadequate to address poverty, the HOME Consortium takes a more comprehensive approach by investing CDBG in homelessness, emergency shelter, transitional/supportive housing, youth services and development, mental health, substance abuse treatment, and job creation. For example, the Economic Development Coordinator and the Business Development Coordinator - funded by CDBG - work closely with local businesses to create/retain jobs for the LMI population. CDBG programs also supports the Spanish American Center's Referral and Advocacy Project's caseworker, who assists LMI and minority populations in completing applications for jobs and housing. These efforts supplement HOME funds to LMI housing activities and encourage like-minded applicants to come forward. Through this AAP, the City aspires to reduce the number of families with incomes at/below the poverty level.

Specific anti-poverty efforts of CDBG and HOME involve producing affordable housing through code enforcement and rehabilitation; supporting developers in creating new affordable housing; assisting LMI households in finding and sustaining employment and housing; and supporting businesses in retaining and creating jobs. Both cities work closely with local food pantries, service providers, faith-based institutions, public safety, and relevant groups to coordinate efforts and address the greatest needs concerning poverty-level families. The region's anti-poverty agency, Making Opportunity Count (MOC), has several programs and resources to reduce the number of poverty-level families in the Consortium:

- Family and children-based services ranging from childcare and HeadStart, to the North Central WIC (Women, Infants, Children) Supplemental Nutrition Program, Coordinated Family and Community Engagement, the Young Parent Program, and a Family Resource Center;
- Teen and youth programs including after school, summer camp, teen summer employment, bystander intervention, and sexuality education;
- Emergency services including supportive housing, family shelter placement and support, and supplemental rent/utility assistance;
- Healthy home services including lead poisoning prevention, weatherization, and heating system support;
- Economic stability programs such as financial literacy, tax preparation, the Secure Jobs Initiative; and
- Elderly services including home-delivered meals and group dining cafes

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

Leominster's strategy to overcome institutional gaps while addressing priority needs is to supplement funding with additional opportunities as much as possible. The City's full-time Grants Administrator seeks out those additional opportunities. Leominster's Grants Administrator researches and applies for

available grant opportunities, targeting grants related to abandoned/foreclosed housing and public services that the CDBG program would have difficulty managing. The Mayor and City Department heads meet regularly to discuss the challenges and opportunities of projects and share insights on maintaining the institutional structure to serve the most in need. Leominster also has an annual allocation process for CDBG activities. Meetings are held on an as-needed basis to collect information about needs, aid in the application process, and report on annual program funding. When applicable, community development staff also participate in outside community meetings and collaborate with Leominster Housing Authority on activities.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

Public/private entities meet to discuss issues. As Consortium members, Fitchburg and Leominster work on investments and strategies via HOME. Both are North Central Massachusetts CRA Coalition members. Leominster is a member of the Worcester CoC, representing organizations who help the homeless, chronically homeless, and those at risk. Staff attend meetings and consult when needed. The Coalition receives HUD funds and coordinates within the CoC, improving service delivery and distribution to areas of demonstrated need. The City consults with its CoC partners, providers, etc. to leverage resources. Staff may attend LHA, NewVue, and other meetings. Leominster enhances coordination by hosting meetings during Annual Action Plan development; visiting providers for monitoring; meeting to improve Consolidated Plan implementation; and serving as a point of contact. The Economic Development and Business Development Coordinators works with the North Central MA Career Center, the Workforce Investment Board, and businesses to create/retain jobs based on Special Tax Assessment (STA) or Tax Incentive Financing (TIF) Agreements.

Both cities have needs verified by the Community Needs Surveys and focus groups. Agencies reported affordable housing and access remain top needs among LMI and English as a second language (ESL) populations. The Spanish American Center is one of the largest Hispanic agencies in the region. They have a Family Advocate Information and Referral Specialist who provides referral, advocacy, and case management for housing, health, education, employment, welfare, immigration, social security, food pantry, voter registration, and translation services. They partner to bridge gaps, including with the Central MA Area on Aging and the Greater Worcester Community Foundation.

The Community Health Network of North Central MA (CHNA 9) was created by the Department of Public Health (DPH). CHNA 9 is a partnership between DPH, the Central MA Center for Healthy Communities, hospitals, etc. to identify and address needs. They are a clearinghouse for mental and behavioral health, including substance use, COVID- 19, anxiety, and depression.

The Family Resource Center offers housing for at-risk of homelessness and identifies mental health services. LUK, Inc. offers programs addressing mental/behavioral health, trauma, addiction, substance abuse, and homelessness. LUK reaches over 12,000 members through youth development, youth

substance abuse prevention, trauma response, autism services, and street outreach. Their residential services help youth transition from situations by providing placement, stabilization, case management, and crisis and behavior management.

The Arc of Opportunity assists those with disabilities and their families via advocacy, education, employment, residential and recreational services. Their Home Support program assists those with physical, intellectual, or developmental disabilities, autism, etc. create a home while remaining active. They coordinate with others for in-home, adult family care, shared living, DESE/DDS, and Agency with Choice programs.

Making Opportunity Count (MOC) is an anti-poverty organization who delivers many services - childcare, education, nutrition, and health. Some programs offers are: case management information and referrals through the Fitchburg Family Resource Center; health and nutrition services through the North Central WIC program; lead safety programs; the CARE AIDS program; and development through Child Care and Head Start.

## **Discussion**

The Consortium coordinates funds to reduce the number of people in poverty by improving quality of life and undertaking activities in coordination with other policies, programs, and expenditures, especially the CDBG program. Staff work with stakeholders each year to eliminate barriers to affordable housing, address obstacles to meet the underserved need, enhance coordination, and develop the institutional structure. Each of these actions in this section address the priority needs and goals identified in the 2022-2026 Strategic Plan.

## Program Specific Requirements

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

#### Introduction

The following sections address the City of Leominster's actions, programs and policies to meet program-specific requirements for the CDBG program.

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(l)(1)

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

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

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	70.00%

## **Discussion**

The City will receive \$444,829 in funds in PY48. The City anticipates additional program income and may need to reprogram prior year resources towards PY48 activities. The programs that benefit LMI households will be prioritized. Other programs include COVID-19 response; housing; economic development; public facilities and infrastructure improvements; youth programs; park improvements; and public services that assist the homeless and the unemployed through counseling, rental assistance, down payment assistance, case management, and job training.