

CONSOLIDATED PLAN

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

JULY 1, 2020 – JUNE 30, 2025

*For submission to the Department of Housing and Urban Development
June, 2020*

Table of Contents

Executive Summary

ES-05 Executive Summary.....	1
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The Process

PR-05 Lead and Responsible Agencies.....	7
PR-10 Consultation.....	8
PR-15 Citizen Participation.....	28

Needs Assessment

NA-05 Overview.....	34
NA-10 Housing Needs Assessment.....	36
NA-15 Disproportionately Greater Need: Housing Problems.....	49
NA-20 Disproportionately Greater Need: Severe Housing Problems.....	53
NA-25 Disproportionately Greater Need: Housing Cost Burden.....	57
NA-30 Disproportionately Greater Need: Discussion.....	59
NA-35 Public Housing.....	67
NA-40 Homeless Needs Assessment.....	74
NA-45 Non-Homeless Special Needs Assessment.....	84
NA-50 Non-Housing Community Development Needs.....	91

Market Analysis

MA-05 Overview.....	94
MA-10 Number of Housing Units.....	95
MA-15 Cost of Housing.....	104
MA-20 Condition of Housing.....	116
MA-25 Public and Assisted Housing.....	122
MA-30 Homeless Facilities.....	129
MA-35 Special Needs Facilities and Services.....	135
MA-40 Barriers to Affordable Housing.....	142
MA-45 Non-Housing Community Development Assets.....	144
MA-50 Needs and Market Analysis Discussion.....	147
MA-60 Broadband Needs.....	150
MA-65 Hazard Mitigation.....	151

Strategic Plan

SP-05 Overview.....	153
SP-10 Geographic Priorities.....	155
SP-25 Priority Needs.....	156
SP-30 Influence of Market Conditions.....	159
SP-35 Anticipated Resources.....	161
SP-40 Institutional Delivery Structure.....	165
SP-45 Goals.....	181
SP-50 Public Housing Accessibility and Involvement.....	183
SP-55 Barriers to Affordable Housing.....	185

SP-60 Homelessness Strategy.....	193
SP-65 Lead-based Paint Hazards.....	198
SP-70 Anti-Poverty Strategy.....	202
SP-80 Monitoring.....	206

Appendix

2019 Housing Inventory Count.....	210
Analysis of Impediments Status Report.....	223
Citizen Participation Plans.....	251
Public Comments and Responses.....	265
City Council Board Order.....	294
Non-state Certifications and SF-424.....	296

Executive Summary

ES-05 Executive Summary – 24 CFR 91.200(c), 91.220(b)

1. Introduction

Annually, the City of Newton receives Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG) funds from the U.S. Department of Housing and Urban Development (HUD). HOME funds are received on behalf of the WestMetro HOME Consortium (Consortium), consisting of twelve other member communities – the Towns of Bedford, Belmont, Brookline, Concord, Lexington, Natick, Needham, Sudbury, Watertown, and Wayland and the Cities of Framingham and Waltham.

As recipients of these funds, the City of Newton and the Consortium are required to engage in a five-year comprehensive strategy, known as the Consolidated Plan. The FY21-25 Consolidated Plan identifies the most pressing needs in the community as they relate to low- to moderate-income individuals and families, analyzes market conditions that contribute to those needs, and outlines a strategic plan with actionable steps, goals, and priorities to support Newton's and the Consortium's most vulnerable populations.

While each of these programs is unique, the overarching purpose of the three programs is to support low- to moderate-income individuals and families, as well as individuals and families who are homeless or at-risk of homelessness, through the creation and rehabilitation of affordable housing, direct financial assistance to renters and homebuyers, the provision of supportive and human services, financial support for emergency shelter operations, and the expansion of economic opportunities.

The FY21-25 Consolidated Plan includes the following sections: 1.) The Executive Summary, 2.) The Process - the planning process and citizen participation, 3.) The Needs Assessment - an assessment of the housing and community development needs in Newton and the Consortium, 4) The Market Analysis - an analysis of market conditions that contribute to these needs, 5.) The Strategic Plan - a strategic plan outlining actionable steps, goals, and priorities, and 6.) The Appendix. For the next five years, the Consolidated Plan will guide the use of CDBG, HOME, and ESG funds to address the identified needs. Finally, the FY21 Annual Action Plan is the first year of the Consolidated Plan and describes the anticipated uses of CDBG, HOME, and ESG funds for the fiscal year ahead (July 1, 2020-June 30, 2021). Recommendations are based on the needs, goals and strategies captured in the FY21-FY25 Consolidated Plan.

While Brookline, Framingham, and Waltham are member communities of the HOME Consortium, these communities are also CDBG entitlement communities and receive their own

annual CDBG allocations from HUD. In addition to detailing their housing needs, priorities and strategies as they relate to WestMetro HOME Consortium funds in this Consolidated Plan, these entitlement communities must each submit their own five-year Consolidated Plan and Annual Action Plan related to their CDBG allocations. However, throughout the following pages of this plan, CDBG-funded housing projects and programs in Brookline, Framingham, and Waltham are discussed, as they complement the housing projects and programs funded through HOME.

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

The Needs Assessment and Market Analysis set the stage for the development of “The Strategic Plan” section of the Consolidated Plan, which outlines overarching goals, priorities, and actionable steps to be undertaken by the City of Newton and WestMetro HOME Consortium over the next five years.

The FY21-25 Consolidated Plan identifies the following five overarching goals for the City of Newton:

- **Affordable Housing**
Create, preserve, and rehabilitate safe, decent, and affordable rental and ownership housing and provide financial support to income-eligible first-time homebuyers.
- **Fair Housing**
Continued education around fair housing laws, regulations and their enforcement are critical to ensuring that every individual and household has equal opportunity and access to affordable housing in Newton and the WestMetro HOME Consortium.
- **Human Services**
Financial support for programs that directly provide stability across the lifespan for Newton’s low- to moderate-income population.
- **Supportive Services for Homeless and At-Risk of Homeless**
Provide supportive services for individuals and families that are homeless or at-risk of homelessness, including financial support for existing emergency and transitional housing.
- **Architectural Access**
Removal of material and architectural barriers restricting mobility and accessibility of elderly or severely disabled persons, through public thoroughfares, public buildings, parks and recreational facilities, and nonprofit agencies.

The Plan also identifies the following three overarching goals for the WestMetro HOME Consortium:

- **Affordable Housing**
HOME funds will be used to create and rehabilitate safe, decent, and affordable rental and ownership housing throughout the Consortium, including public housing.

- **Tenant Based Rental Assistance (TBRA)**
HOME funds will be used for Tenant Based Rental Assistance programs (security deposit and full assistance programs) throughout the Consortium to assist income-eligible households in moving into a reasonably-priced rental unit.
- **Community Housing Development Organizations (CHDO)**
HOME funds will be used to support the operations of certified Community Housing Development Organizations (CHDO's) actively developing in the WestMetro HOME Consortium. Funds will also be used to support these organizations in the development and rehabilitation of affordable rental housing throughout the Consortium.

3. Evaluation of past performance

Housing Rehabilitation

Between July 1, 2015 and June 30, 2019, 8 income-eligible homeowners and 211 rental units owned by five different nonprofit organizations – 2Life Communities, Barry L. Price Rehabilitation Center, Citizens for Affordable Housing Newton Development Organization (CAN-DO), DARE Family Service, and Newton Housing Authority – were provided loans and/or grants to allow them to bring their homes into compliance with health, safety, and building codes and to conduct hazard abatement (i.e. lead paint, asbestos etc.) as necessary through the City's Housing Rehabilitation Program. This successful program will continue to expand in FY21-25 to target low- to moderate-income homeowners who currently have illegal and unsafe accessory apartments in their homes. Many of these "naturally affordable" units can be legalized if they are brought up to code.

Housing Development

Between July 1, 2015 and June 30, 2019, 13 housing units were produced in Newton, and an additional 8 units will be completed by June 30, 2020. All 21 housing units are affordable to households at 80% or less of the AMI, and all units were produced in part by the financial assistance from the CDBG and/or HOME program. In addition, the City of Newton will be supporting the development of the Haywood House. The Haywood House will be constructed on underutilized land owned by the Newton Housing Authority and will consist of 55 one-bedroom rental apartments, of which 32 units will be affordable to elderly households at or below 60% AMI. Four units will be designated for households that are homeless or are at-risk of homelessness. CDBG funds will support site improvements, and the project is expected to break ground in FY21. Finally, 2Life Communities was selected as the developer to expand its existing Golda Meir House at 160 Stanton Avenue. The expansion will develop 9 units of permanent support housing for chronically homeless adults with disabilities and is expected to break ground in FY21. Both the Haywood House and Golda Meir House were awarded Low-Income Housing Tax Credits.

Public Services/Human Services

From FY16-20, the City of Newton maximized its spending on Public Service programs to the greatest extent allowed by regulation. In the past five years, the City awarded almost \$1.5 million in public service grants to 27 programs and across 22 non-profit organizations in and around Newton to provide vital services to the City's vulnerable population. These programs included scholarships for childcare and afterschool programs, job training, mental health services, services for survivors of domestic violence, emergency payment for rent and utility, and services and activities for people with disabilities and elderly. From FY21-25, this successful program will continue to provide the critical public service grants to the maximum extent possible. To strengthen this program, the annual RFP will place a focus on the public service needs identified in the FY21-25 Consolidated Plan, with the hope to close the gap and meet those needs. Furthermore, low- to moderate-income individuals and families will be better supported by building on the strong collaboration and coordination among the housing and social service providers.

Public Facilities

As affordable housing becomes an increased priority for the City of Newton, the FY21-25 Consolidated Plan does not recommend allocating CDBG funds toward the neighborhood improvement program. However, architectural access continues to be a critical need to ensure there is increased accessibility and mobility for persons with disabilities and the elderly. From FY16-20, the City undertook 8 architectural access projects. These projects resulted in the following accomplishments: the successful installation of 71 curb cuts, 22 accessible pedestrian signals, and 3 rectangular rapid flashing beacons; installation of 1 accessible toilet room; modernization of 1 elevator; and the creation of 3 park pathways. From FY21-25, the architectural access program will continue to remove architectural barriers and materials and ensure equal opportunity and access for all.

4. Summary of citizen participation process and consultation process

Staff employed a number of methods to solicit citizen and agency input, including Community Needs Assessment Meetings open to the public; a series of inter-departmental focus groups; a number of presentations and discussions with city boards and commissions including the Commission on Disability, the Fair Housing Committee, and the Newton Housing Partnership; a series of brown bag lunches / discussions with housing and social service providers; and other focused meetings and phone calls with other relevant agencies and stakeholders like the City's partners at the Balance of State Continuum of Care.

In an effort to reach a broad base of stakeholders, particularly low- to moderate-income individuals, the three Community Needs Assessment Meetings were held in three different locations in different parts of the city, and at different times of the day. The first two meetings were hosted by Public Service subrecipients – the Newton Community Development Foundation (NCDF) at its Weeks House, A mixed-income housing development, and Family Access, in its gymnasium. Many of the participants at the Weeks House event were low-income

elderly residents of the site, and the participants at the Family Access event included a number of low- to moderate-income individuals actively engaged in a search for affordable housing in Newton.

The Planning and Development Board held a public hearing on Monday, April 6, 2020 and voted to recommend both the FY21-25 Consolidated Plan and FY21 Annual Action Plan as presented to the Mayor. At their April 13, 2020 meeting, the Zoning & Planning Committee also voted to authorize the submission of these plans to HUD for the City of Newton Community Development Block Grant (CDBG) and Emergency Solutions Grant (ESG) funds and the WestMetro HOME Consortium's HOME Investment Partnerships Program (HOME) funds.

5. Summary of public comments

The City received comments from four residents of Newton and one resident of Bedford, during the development of the FY21-25 (FFY20-24) Consolidated Plan. Please see the appendix to review the written public comments and responses.

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

All public comments received were accepted.

THE PROCESS

The Process

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

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

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

Agency Role	Name	Department/Agency
CDBG Administrator	NEWTON	Housing and Community Development Division
HOME Administrator	NEWTON	Housing and Community Development Division
ESG Administrator	NEWTON	Housing and Community Development Division

HUD Table 1 – Responsible Agencies

2. Narrative

The lead agency responsible for overseeing the development of the Consolidated Plan is the Housing and Community Development Division (the Division) in the City of Newton’s Planning and Development Department. In addition to serving as the lead agency for the City of Newton’s CDBG and ESG consolidated planning process, the Division also serves as the lead entity for the HOME portion of the Consolidated Plan for the WestMetro HOME Consortium. The HOME Consortium consists of the towns of Bedford, Belmont, Brookline, Concord, Lexington, Natick, Needham, Sudbury, Wayland, and the cities of Framingham, Newton, Waltham, and Watertown.

3. Consolidated Plan Public Contact Information

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PR-10 Consultation - 91.100, 91.200(b), 91.215(l)

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

The City of Newton Housing and Community Development Division (the Division) of the Department of Planning and Development works collaboratively with municipalities, city departments, housing providers and advocates, and human service and homelessness agencies throughout the community and region. These joint efforts seek to address community needs, inform investment decisions and ensure the provision of critical services like mental health care, crisis prevention, youth and elderly programming, childcare, family support, affordable housing and employment opportunities for developmentally disabled persons. The Division's consultations with these providers and experts involved needs assessment sessions with other City departments and City boards and commissions, such as Health and Human Services, Economic Development, Conservation, Public Works, Senior Services, Engineering, Parks and Recreation, Transportation, the Commission on Disability, the Fair Housing Committee, and the Newton Housing Partnership; brown bag lunches / discussions with Human Service and ESG subrecipients; focused meetings and phone calls with other agencies and individuals like our Continuum of Care partners at the Balance of State (Department of Housing and Community Development); and three Community Needs Assessment Meetings open to the public in late September / early October 2019. The Consolidated Planning process, citizen participation and ongoing coordination with the above-mentioned service providers improves communication, leverages resources, reduces duplication and produces more meaningful projects throughout Newton.

The communities in the HOME Consortium engage housing and service providers by staffing committee meetings representative of local and regional providers, hosting educational workshops on relevant topics and resources, and supporting current communication channels.

Bedford Youth and Family Services (BYFS), a town department, works diligently to ensure that all residents in the community are aware of resources for which they are eligible and that are available to them. The BYFS contracts with Elliot Community Health Services to provide counseling for all Bedford residents including homeless outreach, homeless supports and tenancy preservation.

The Brookline Community Mental Health Center works in partnership with the Brookline Housing Authority to provide case management services for many of its residents. Many of Brookline's affordable housing projects are owned and operated by nonprofits that provide case management and supportive services to assist residents with health, mental health, and service needs. The Brookline Environmental Health Division maintains a comprehensive program of environmental health services, which includes housing code inspections,

compliance and enforcement activities, monitoring of environmental hazards, and consultation and guidance to citizens and governmental agencies regarding environmental health issues.

The Town of Concord continues to enhance communication between the Concord Housing Authority and other assisted housing providers regarding tenants' concerns and those in need of assistance (mental health, financial, risk of eviction, hoarding, etc.). Concord also employs a community services coordinator who works in collaboration with the Concord Housing Authority, Eliot Community Human Services Outreach and Homeless Services, Eliot Community Human Services, Emerson hospital and the Department of Transitional Assistance, to assist individuals and families to find appropriate and safe housing. The community services coordinator refers individuals and families to local resources that assist with housing costs, moving expenses and relocation services. This staff person also works with local funding sources, faith communities, charitable organizations and town entities to try to locate housing options for homeless individuals and families.

The City of Framingham holds monthly workshops with service providers. For example, in 2017 Framingham's Community Development Department began a homelessness initiative to bring together representatives of local nonprofit agencies, municipal and state officials, the Massachusetts Housing Alliance, Boston Medical Center, and the Massachusetts Department of Housing and Community Development with the goal of offering insight into resources that reduce homelessness. Community development staff participate on various task forces and committees with service and housing providers, including the Downtown Task Force, Hoarding Task Force, and Framingham Community Partners. The City of Framingham works collaboratively with the Department of Housing and Community Development (DHCD), as a member of the Balance of State Continuum of Care, to address homelessness within the community and region.

The Town of Lexington communicates with the Lexington Housing Authority and other housing providers regarding tenants' concerns and those in need of assistance (mental health, financial, risk of eviction, hoarding, etc.). The Town publishes a resource guide that is presented by the Human Service Department which brings together state, regional and local resources for residents.

The Natick Community & Economic Development Department, Community Services Department, Natick Affordable Housing Trust and Natick Housing Authority continually communicate with each other through monthly meetings and cooperative projects. The CED is currently working with the NHA on several projects, one of which is the future expansion of the Cedar Gardens housing development. Many of these entities meet monthly during the Natick Affordable Housing Trust meetings.

In August of 2019, Needham, working with State Representative Denise Garlick and the Needham Housing Authority, convened a meeting to discuss housing issues and resources with a wide range of town representatives and service providers. There will be a follow up meeting to convene local housing stakeholders and Needham Housing Authority tenants on public

housing tenant needs. The Town's housing specialist has also met with representatives of the Needham Council on Aging and the Public Health Division on new housing initiatives, including an accessory dwelling unit bylaw and a small repair grant program for lower income seniors. The housing specialist will continue to engage local and regional housing stakeholders on housing-related initiatives, recently reaching out to representatives of Springwell (the Area Agency on Aging) and Visiting Nurses Association.

The Sudbury Housing Authority and Longfellow Glen (the largest affordable housing facility that accepts Section 8 Vouchers) communicate regarding tenants' concerns and those in need of assistance (mental health, financial, risk of eviction, hoarding, etc.). The Town also has a social worker who regularly meets with tenants as well as a senior outreach worker who refers tenants to other local services such as financial assistance, health care, food assistance, and reduced school lunches. Sudbury's Board of Health nurse is another point of contact for health concerns from both public and assisted housing providers.

The City of Waltham works collaboratively with the Waltham Homeless Coalition, an entity made up of local stakeholders convened for the purpose of ensuring that homeless planning is coordinated across municipalities and agencies. Waltham Health and Police Departments are part of Metro Boston Project Outreach (MBPO), a regional effort to create a resource network for individuals who suffer from addiction and their family and friends. MBPO is a collaboration of health and police departments, emergency personnel, social workers, hospitals and prevention, intervention, treatment and recovery providers from Arlington, Belmont, Lexington, Newton, Waltham, Watertown and Weston who work together to address substance use disorders in the region. The primary mission of MBPO is to connect residents with substance use disorders and their families to treatment and support through monthly drop-in resource events.

In Watertown, the Director of Senior Services meets regularly with the Director of the Housing Authority. The Senior Center also has a licensed social worker who advocates for frail elders by providing counseling, referral to outside agencies (i.e. Springwell, SHINE), as well as help with emergency assistance, MassHealth/Medicare applications, fuel assistance and food stamps.

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

Brookline, Newton, Waltham, and Watertown work in coordination to provide shelter, housing and services to the homeless and near-homeless population through the Brookline-Newton-Waltham-Watertown Continuum of Care (BNWW CoC). In December 2016, the BNWW CoC, previously led by the City of Newton, merged with the Massachusetts Balance of State Continuum of Care (BoS CoC), under the supervision of the Department of Housing and Community Development (DHCD). The City of Newton actively collaborates and coordinates with the BoS CoC through the City's Emergency Solutions Grant (ESG) allocation process and

planning efforts. Although the BNWW is under the direction of DHCD, this group continues to meet regularly to strengthen the regional network of providers and the effectiveness of homeless assistance programs.

In FY20 (FFY19), the City of Newton's ESG program provided approximately \$150,500 to five nonprofit organizations: Brookline Community Mental Health Center, Community Day Center of Waltham, Middlesex Human Service Agency, REACH Beyond Domestic Violence, and The Second Step, Inc. The ESG funds support the nonprofit organizations' programs, including emergency shelters for homeless individuals; transitional housing and supportive services for survivors of domestic violence and their families; case management and supportive services to prevent individuals and families from becoming homeless; and case management and supportive services and to house homeless individuals and families across the BNWW region. The City of Newton and its ESG subrecipients also actively participate in the BoS CoC's Coordinated Entry process to assess the housing needs of homeless individuals and to meet those needs through the housing placement of available units across the 80+ member communities in the consortium.

In addition, the City of Newton supports BoS CoC's Point-In-Time Count (PITC) and Housing Inventory Count (HIC) on an annual basis. This is the principal strategy in which the BoS CoC systematically engages homeless individuals, and once the data is tabulated, and is able to assess their needs. The BoS CoC continues to provide data and technical support to the City of Newton for the development of the Consolidated Plan, Annual Action Plan, and Consolidated Annual Performance and Evaluation Report.

The remainder of Consortium communities utilize available municipal, housing authority and local nonprofit resources to address homeless needs. The communities of Bedford, Concord, Lexington, Sudbury and Wayland rely on community-based social service providers and support systems within the local housing authority to address needs of homeless persons. The Bedford Green housing development provides permanent supportive housing for veterans. Most of the homeless applicants apply to housing and service providers in larger cities and towns which have the resources to address their needs. Chronically homeless families require intensive and long term services in order to be successful, as they often lack the skills necessary to be lease compliant.

The Brookline Community Mental Health Center regularly consults with the Brookline Public Schools, the Brookline Housing Authority, Brookline Health Department, and Police Department, and frequently works with homeless families living in Brookline or families that have lost housing due to emergencies, domestic violence situations, and economic distress. The team provides an array of mental health and supportive services in conjunction with other nonprofits and the Massachusetts Department of Housing and Community Development (DHCD).

The Brookline Community Mental Health Center works in partnership with the Brookline Housing Authority, C3 Healthcare, Center Communities of Brookline, Pine Manor College,

among other partners, to provide housing and case management services for homeless families, each of whom are referred by the Massachusetts Department of Transitional Assistance. Families are transitioned to housing with support services and counseling for up to six months following the transition to permanent status. The Brookline Community Mental Health Center also offers food, rent and utility assistance and referrals to housing, food pantry, and medical services through the local Safety Net Program. Pine Street Inn owns and operates single room occupancy units containing approximately 88 units in Brookline, in which many of the residents are formerly homeless.

Framingham's Community Development Department participates with services and housing providers on various task forces and committees, including the Downtown Task Force, Hoarding Task Force, and Framingham Community Partners. The City of Framingham also works collaboratively with the Department of Housing and Community Development Balance of State Continuum of Care to address homeless housing and service needs within the community and collect data on this population. Framingham's Tenant Based Rental Assistance program provides security deposit and first month's rent to income eligible residents, including homeless households.

The Natick Community & Economic Development Department (CED) manages a homeless voucher program with Natick Affordable Housing Trust (NAHT) and Natick Police, which provides one to two-night emergency assistance to homeless victims needing immediate housing and care. The CED and NAHT are in the process of developing two affordable dwellings for Family Promise MeroWest, a local homeless organization. These units will provide long-term transitional housing to homeless families.

The Town of Needham will continue to refer anyone looking for emergency shelter to appropriate locations such as shelters located in surrounding municipalities. Moreover, the Town's housing specialist offers additional support in answering inquiries and providing important information and referrals. The Needham Housing Authority will continue to assist people who may be homeless or are at risk of homelessness in their search for affordable housing opportunities by prioritizing them for available units.

With consultation and outreach to the Community Day Center, the Waltham Police Task Force, and various other social service agencies, the Waltham Housing Department evaluated the priorities in the community to ensure that services are not duplicated and needs of the homeless and near homeless are being addressed in the most effective way possible. The Waltham HOME-funded Tenant Based Rental Assistance program provides rental assistance to the chronically homeless through referrals from the Community Day Center, the Waltham Police Task force and Massachusetts Health and Shelter Alliance. The TBRA program also provides rental assistance to elderly and families at risk for homelessness through coordination between the Council on Aging and the Waltham Public School administration. The Housing Department administers the city-funded warming shelter which operates from December through March, providing shelter to up to 30 chronically homeless individuals each evening.

Watertown's social service resource specialist, who is employed by Wayside Youth and Family Support Network, works with homeless or near-homeless individuals and families, including unaccompanied youth. The Town also supports a full-time a counselor, who assists in obtaining services and housing referrals for homeless. Veterans and their families are referred to Watertown's Veterans' Services Officer and a licensed social worker at the senior center provides emergency assistance counseling to elderly who are at-risk of homeless or are homeless.

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

The City of Newton communicates and coordinates with the BoS CoC concerning all relevant services to be provided, performance standards, and policies and procedures for the operation and administration of Homeless Management Information System (HMIS). Annually, after consultation with the BoS CoC, the City issues an ESG request of proposals (RFP) to seek applications from qualified nonprofit or municipal organizations who wish to provide services in the BNWW region under the street outreach, emergency shelter, homelessness prevention, and rapid re-housing components of the ESG program. The RFP contains a description of ESG requirements placed on subrecipients, including the policies on the provision of assessment for all persons seeking services, policies on the eligibility of program participants, HUD guidelines in determining homeless applicants or applicants at-risk of homelessness, policies on prioritizing the need of applicants for ESG services, policies on the amount and length of time for financial assistance, guidelines for the Coordinated Entry, and a statement of responsibility for subrecipient(s) to enter all client data into HMIS – or a comparable database for victim service providers. Updates to the aforementioned ESG requirements are consulted and communicated with the BoS CoC prior to implementation.

After the one-month deadline, proposals are assessed by the review committee, consisting of representatives from the BoS CoC, Newton Planning and Development Board, Newton Health and Human Services Department, and the Newton Housing and Community Development Division of the Planning and Development Department. The review committee issued its funding recommendations to the Newton Planning and Development Board and after the 30-day comment period, recommendations were forwarded to the Mayor for final approval.

4. Describe agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities:

The Division's consultations with service providers and experts involved needs assessment sessions with other City departments and City boards and commissions, such as Health and Human Services, Economic Development, Conservation, Public Works, Senior Services, Engineering, Parks and Recreation, Transportation, the Commission on Disability, the Fair

Housing Committee, and the Newton Housing Partnership; brown bag lunches / discussions with our Human Service and ESG subrecipients; focused meetings and phone calls with other agencies and individuals including Continuum of Care partners at the Balance of State (DHCD); and three Community Needs Assessment Meetings open to the public in late September / early October 2019.

Staff from the HOME Consortium communities consulted with local housing providers, nonprofits, social services agencies, broadband companies and municipal departments to assess housing needs and develop programs, policies, and projects to address these needs. In some instances, these consultations forged new long-term connections and partnerships that will continue beyond the Consolidated Planning process. Participation by formalized groups that had been previously established to enhance coordination between providers, policymakers, advocates, and other entities, reinforced the ongoing effectiveness of this approach.

Please see [PR-10 Consultation Table](#) at the end of this section

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

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

6. Other local/regional/state/federal planning efforts considered when preparing the Plan.

Please see [PR-10: Other Plans Table](#) at the end of this section

7. Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I)):

Division staff worked with the members of the WestMetro HOME Consortium to support their activities, to understand needs and develop priorities for their communities. Division staff also consulted with the former Brookline-Newton-Waltham-Watertown Continuum of Care and DHCD's Balance of State CoC to get those jurisdictions' and providers' input on the Plan. Staff from the Newton Housing Authority (NHA) has an ongoing relationship with Division staff, as they work jointly on projects involving the rehabilitation and renovation of NHA units, the preservation of existing affordable units, and the creation of new affordable units. NHA staff participated in one of the three Community Needs Assessment Meetings held in September and October 2019. The NHA also contributed to several sections of the Consolidated Plan related to Housing Authority activity.

Finally, Division staff relied upon the data, analysis, and projections of a variety of federal, state, local departments and agencies, as well as regional organizations and educational institutions. The following entities and data sources played an important role in the Needs Assessment and Market Analysis of the Consolidated Plan:

- U.S. Census Bureau, 2010 Decennial Census
- American Community Survey Estimates
- U.S. Department of Housing and Urban Development
- Comprehensive Housing Affordability Strategy (CHAS)
- Office of Community Planning & Development Maps
- U.S. Bureau of Labor Statistics
- MA Department of Labor and Workforce Development
- City of Newton Departments of Assessing & Inspectional Services
- The Warren Report

The WestMetro HOME Consortium communities' partner together to leverage federal, state and local resources to generate affordable housing for the region. Additionally, the five smallest towns in the Consortium, Bedford, Concord, Lexington, Sudbury, and Wayland are members of the Regional Housing Service Office (RHSO). The RHSO is a municipal regional collaborative which increases the towns' capacity for producing affordable housing.

Each municipality in the HOME Consortium works closely with their Housing Authority, the largest provider of affordable housing in the community. This collaboration ranges from financial support for construction, rehabilitation, and small repair projects to targeting housing authority residents with local programs, such as tenant based rental assistance.

The Department of Housing and Community Development (DHCD) manages the Balance of State Continuum of Care, which encompasses the entire WestMetro HOME Consortium. HOME communities communicate with state agencies, such as DHCD, the Massachusetts Department of Corrections, the Health Department, and the Massachusetts Bay Transportation Authority on homeless assistance, affordable housing projects, lead poisoning prevention and other anti-poverty goals. Ongoing participation by HOME communities in committees supported by the Massachusetts Area Planning Council (MAPC) provide another forum for regional discussions. Datasets from Data Common, also operated by MAPC, supplied community-specific data for the Consolidated Plan.

Please see [PR-15: Citizen Participation Table](#) at the end of the following section.

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

Agencies/Groups/Organization Type	Type of Organization	Type of Organization (If serving multiple purposes)	What Section of the Plan was addressed by consultation?	How was the organization consulted?	What are the anticipated outcomes of the consultation or areas for improved coordination?
BEDFORD					
Bedford Housing Authority	Public Housing Authority	Public Housing Authority	Public Housing Needs	The BHA attended a Consolidated Plan public meeting comprised of Town Departments and committees to offer input relative to community-wide housing needs and strategic plan goals. The BHA also provided direct responses to Public Housing Needs.	Collaboratively develop community-wide housing goals based on community needs for inclusion in the Consolidated Plan and Annual Action Plan.
Bedford Housing Partnership	Other government - Local		Housing Need Assessment	The BHP attended a Consolidated Plan public meeting comprised of Town Departments and committees to offer input relative to community-wide housing needs and strategic plan goals.	
Bedford Health and Human Services	Other government - Local		Homelessness Strategy	The Town youth and family services community social worker was consulted to provide information regarding social services available to residents experiencing homelessness or at risk for homelessness and/or with other special needs	
Bedford Housing Trust	Other government - Local		Housing Need Assessment	The Trust attended a Consolidated Plan public meeting comprised of Town Departments and committees to offer input relative to community-wide housing needs and strategic plan goals.	
Bedford Housing Trust	Other government - Local		Housing Need Assessment	The BHT attended a Consolidated Plan public meeting comprised of Town Departments and committees to offer input relative to community-wide housing needs and strategic plan goals.	
BELMONT					
Belmont Housing Trust	Other government - Local		Housing Need Assessment	The Trust conducted various public meeting comprised of Town Departments, committees, Town Meeting Members, and interested residents to gather input relative to community-wide housing needs and strategic plan goals.	Collaboratively develop community-wide housing goals based on community needs for inclusion in the Consolidated Plan and Annual Action Plan.
Belmont Housing Authority	Other government - Local		Public Housing Needs		
Belmont Council on Aging	Other government - Local		Housing Need Assessment		
BROOKLINE					
Brookline Age Friendly Committee	Housing	Services-Elderly Persons	Housing Need Assessment	Brookline Planning Department staff met with the Brookline Age Friendly Committee on September 10, 2019 to discuss issues and needs of senior citizens concerning affordable housing, homelessness and public services.	A defined view of the high priority needs that seniors face in the community and an understanding of projects that are most important to their well-being.
Brookline Housing Advisory Board	Housing	Housing	Housing Need Assessment	Staff from the Brookline Planning Department attended the Brookline Housing Advisory Board meeting on October 15, 2019.	The anticipated outcome is a better understanding of the housing needs in Brookline
Brookline Commission on Diversity, Inclusion and Community Relation's Fair Housing Subcommittee	Housing	Services-Persons with Disabilities	Housing Need Assessment	Staff from the Brookline Planning Department met with the Brookline Commission on Diversity, Inclusion and Community Relation's Fair Housing Subcommittee on September 23, 2019 to discuss housing, with a focus on fair housing, and other community development needs.	Information to guide the priorities for the Consolidated Plan and strengthen the Town's strategy toward housing and community development needs.
Brookline Center for Mental Health	Housing	Services-homeless	Housing Need Assessment	Staff from the Brookline Planning Department held a one-on-one meeting with staff members from the Brookline Mental Health Center on August 5, 2019 to discuss homelessness, affordable housing, and social service needs in the Town.	A better understanding of affordable housing, homelessness and social services needs which will help guide the development of the Consolidated Plan.
Brookline Council on Aging	Housing	Services-Elderly Persons	Housing Need Assessment	Staff from the Brookline Planning Department held a one-on-one meeting with the Brookline Council on Aging on September 16, 2019. The focus of the meeting was the community development and housing needs of seniors.	A defined view of the high priority needs that seniors face in the community and an understanding of projects that are most important to their well-being.

Agencies/Groups/Organization Type	Type of Organization	Type of Organization (If serving multiple purposes)	What Section of the Plan was addressed by consultation?	How was the organization consulted?	What are the anticipated outcomes of the consultation or areas for improved coordination?
Brookline Community Foundation	Housing	Civic Leaders	Housing Need Assessment	Staff from the Brookline Planning Department held a one-on-one meeting with the Brookline Community Foundation on September 5, 2019 to learn more about the Foundation's programs and gain a further understand of town-wide housing and public service needs.	Improved understanding of the housing and community development needs in Brookline; identification of points of collaboration with other organizations in town.
Pine Street Inn	Housing	Services-homeless	Housing Need Assessment	Staff from the Brookline Planning Department held a one-on-one meeting with staff from Pine Street Inn on September 11, 2019 to discuss affordable housing and service needs for individuals who are very low income and for homeless individuals and families.	An understanding of the existing barriers to create SRO units for formerly homeless individuals and how to improve that process; high priority social services for homeless individuals.
Brookline Improvement Coalition	Housing	Service-Fair Housing	Housing Need Assessment	Staff from the Brookline Planning Department held a one-on-one meeting with members of the board from the Brookline Improvement Coalition.	Improved understanding of affordable housing needs in the Town.
Center Communities	Housing	Services-Elderly Persons	Housing Need Assessment	Staff from the Brookline Planning Department held a one-on-one meeting with staff from Center Communities, a local senior housing affordable housing developer on September 12, 2019.	Improved understanding of housing issues facing seniors, social services needed for seniors, and infrastructure issues in the Town.
Commission on Disability	Housing	Services-Persons with Disabilities	Housing Need Assessment	Staff from the Department of Planning attended a meeting of the Commission on Disability on September 19, 2019.	Improved understanding of the needs of persons with disabilities and how federal funds and local resources can be utilized to meet these needs.
Town of Brookline Department of Health	Other-Government Agency	Health Services	Lead Paint Based Strategy	Staff from the Brookline Planning Department consulted with the Town of Brookline Department of Health to specifically discuss lead-paint issues in the Town of Brookline and also the housing availability, affordability and the needs of town residents.	Additional information to educate the public, especially landlords and tenants to identify lead paint and understand their rights.
Massachusetts Housing Partnership	Housing	Regional organization	Housing Need Assessment	Staff from the Brookline Planning Department held a one-on-one meeting with a representative from the Massachusetts Housing Partnership on September 19, 2019.	Improved understanding of regional housing and community development needs and strategies for addressing these needs on a local and regional level.
Brookline Housing Authority	Public Housing Authority	Service-Fair Housing	Public Housing Needs	Staff from the Brookline Planning Department held a one-on-one meeting with staff from the Brookline Housing Authority.	Improved understanding of the needs of BHA residents and the short-term and long-term methods to address these needs through public services and investments in BHA construction projects.
Comcast	Major Employer		Other (broadband access)	Staff from the Brookline Planning Department held a one-on-one meeting with a government relations representative from Comcast on October 3, 2019.	Improved understanding of broadband access in Brookline, including the Internet Essential Program for low-income residents. The Town will collaborate with Comcast to share information about this program.
RCN Cable	Major Employer		Other (broadband access)	Staff from the Brookline Planning Department contacted a government relations representative from RCN Cable	Improved understanding of broadband access in Brookline. RCN is the Brookline Housing Authority high-speed internet provider.
CONCORD					
Concord Housing Development Corp.	Community Development Financial Institution		Housing Need Assessment	The CHDC attended a Consolidated Plan public meeting comprised of Town Departments and committees to offer input relative to community-wide housing needs and strategic plan goals.	Collaboratively develop community-wide housing goals based on community needs for inclusion in the Consolidated Plan and Annual Action Plan.
Concord Dept. of Planning and Land Management	Other government - Local		Housing Need Assessment	The DPLM attended a Consolidated Plan public meeting comprised of Town Departments and committees to offer input relative to community-wide housing needs and strategic plan goals.	
Concord Housing Foundation	Other government - Local		Housing Need Assessment	The Foundation attended a Consolidated Plan public meeting comprised of Town Departments and committees to offer input relative to community-wide housing needs and strategic plan goals.	

Agencies/Groups/Organization Type	Type of Organization	Type of Organization (If serving multiple purposes)	What Section of the Plan was addressed by consultation?	How was the organization consulted?	What are the anticipated outcomes of the consultation or areas for improved coordination?
Concord Housing Authority	Public Housing Authority	Public Housing Authority	Public Housing Needs	The CHA attended a Consolidated Plan public meeting comprised of Town Departments and committees to offer input relative to community-wide housing needs and strategic plan goals. The CHA also provided direct responses to Public Housing Needs.	Collaboratively develop community-wide housing goals based on community needs for inclusion in the Consolidated Plan and Annual Action Plan.
Concord Department of Human Services	Other government - Local		Homeless Strategy	The Town community service coordinator was consulted to provide information regarding social services available to residents experiencing homelessness or at risk for homelessness and/or with other special needs.	
Concord Municipal Light Plant	Other (Please specify)	Other government - Local	Other (Please specify)	The CMLP was contacted directly and asked to provide information on programs for low-income residents to access internet service and to assess access across the community.	Data collection with regard to internet service for low-income households
Hugh Cargill Trust (Concord)	Other government - Local		Non-Homeless Special Needs	The Committee that assists the Board to process applications for emergency financial resources will be contacted directly to discuss needs addressed by the Trust funds, particularly as related to housing needs.	Improved coordination and inclusion of the organization's input in the Consolidated Plan and Action Plan
FRAMINGHAM					
Framingham Housing Authority	Public Housing Authority	Housing	Public Housing Needs	Interviews	Improved coordination and the inclusion of the organization's input in the Consolidated Plan and Annual Action Plan.
Framingham Council on Aging	Services- Elderly Person	Other government- local	Housing Need Assessment	Interviews	
South Middlesex Opportunity Council, Inc.	Services- Housing , Housing, Services- Children- Services- Persons with Disabilities, Services- Victims of Domestic Violence, Services- Homeless	Regional Organization	Public Housing Needs, Homeless Needs- Chronically Homeless, Homeless Needs- Families with Children, Homelessness Needs- Unaccompanied Youth, Homelessness Strategy, Anti-poverty Strategy	Interviews	
Bay Path Elder Services	Services- Elderly Person	Regional Organization	Housing Need Assessment	Interviews	
MetroWest Center for Independent Living	Services- Persons with Disabilities	N/A	Housing Need Assessment	Interviews	
Framingham Planning Office	Other government- Local	N/A	Housing Need Assessment	Interviews	
Framingham Veteran's Office	Other government- Local	Services- homeless	Homelessness Needs- Veterans	Interviews	
Wayside Community Programs	Housing	Services- Children	Housing Need Assessment	Interviews	
Advocates	Services- Persons with Disabilities	N/A	Housing Need Assessment	Interviews	
MetroWest Legal Services	Other	Services- homeless	Homelessness Strategy	Interviews	
Framingham Disability Commission	Other government- Local	Services- Persons with Disabilities	Housing Need Assessment	Interviews	
Fair Housing Commission	Other government- Local	Other government- Local	Housing Need Assessment	Interviews	
Framingham Assessing Department	Other government- Local	N/A	Housing Need Assessment	Interviews	
Framingham Health Department	Other government- Local	Services- Health	Lead-Based Paint Strategy	Interviews	
City of Framingham- DPW	Other Government- Local	N/A	Non-Homeless Special Needs	Interviews	
Framingham Parks and Recreation	Other Government- Local	N/A	Non-Homeless Special Needs	Interviews	
Framingham Conservation Commission	Other Government- Local	N/A	Non-Homeless Special Needs	Interviews	
Framingham Housing Authority	Public Housing Authority	Public Housing Authority	Public Housing needs	Interviews	
Department of Corrections	Other government- State	N/A	Homeless Needs, Homeless Strategy	Interviews	
MetroWest Medical Center	Services- Health	Regional Organization	Homeless Needs, Homeless Strategy	Interviews	
MetroWest Chamber of Commerce	Regional Organization	N/A	Market Analysis	Interviews	
Downtown Framingham Inc.	Neighborhood Organization		Market Analysis	Interviews	
LEXINGTON					
Lexington Housing Partnership	Other government - Local		Housing Need Assessment	The LHP attended a Consolidated Plan public meeting comprised of Town Departments and committees to offer input relative to community-wide housing needs and strategic plan goals.	The anticipated outcomes of the consultation are improved coordination and inclusion of the organization's input in the Consolidated Plan and Action Plan.

Agencies/Groups/Organization Type	Type of Organization	Type of Organization (If serving multiple purposes)	What Section of the Plan was addressed by consultation?	How was the organization consulted?	What are the anticipated outcomes of the consultation or areas for improved coordination?
Lexington Human Services	Other government - Local		Homelessness Strategy	The Town social worker was consulted to provide information regarding social services available to residents experiencing homelessness or at risk for homelessness and/or with other special needs	The anticipated outcomes of the consultation are improved coordination and inclusion of the organization's input in the Consolidated Plan and Action Plan.
Lexington Housing Assistance Board (LexHAB)	Other government - Local		Housing Need Assessment	The LexHAB attended a Consolidated Plan public meeting comprised of Town Departments and committees to offer input relative to community-wide housing needs and strategic plan goals.	
Lexington Housing Authority	Public Housing Authority	Public Housing Authority	Public Housing Needs	The LHA attended a Consolidated Plan public meeting comprised of Town Departments and committees to offer input relative to community-wide housing needs and strategic plan goals. The LHA provided direct responses to Public Housing Needs.	
NATICK					
Natick Human Service Department	Other government - Local		Housing Need Assessment	Interviews and focus groups	Improved coordination and the inclusion of the organization's input in the Consolidated Plan and Annual Action Plan.
Senior Center	Services - Elderly Persons		Housing Need Assessment		
ADA/504 Coordinator	Services - People with Disabilities		Housing Need Assessment		
Affordable Housing Trust	Housing		Housing Need Assessment		
Family Promise	Housing	Services - homeless	Housing Need Assessment		
Habitat for Humanity	Housing		Housing Need Assessment		
Natick Housing Authority	Public Housing Authority		Housing Need Assessment		
Natick Service Council	Services - employment	Homeless Needs - Families with children	Housing Need Assessment		
Natick Health Department	Other government - Local		Lead-based Paint Strategy		
State Health Dept/ CLPPP	Other government - State		Lead-based Paint Strategy		
MAPC	Regional Organization	Planning organization	Market Analysis; Other (broadband access)		
MBTA	Other government - State		Anti-poverty Strategy		
Natick Housing Authority	Public Housing Authority		Public Housing Needs		
Natick Conservation Commission	Other government - Local		Other (hazard risks)		
Natick Health Service Department	Other government - Local		Homelessness Needs		
Natick Human Service Department	Other government - Local		Homelessness Needs		
Natick Veteran's Agent	Other government - Local		Homelessness Needs - Veterans		
Natick Police Department	Other government - Local		Homeless Needs - Chronically homeless		
Family Promise	Housing	Services-homeless	Homeless Needs - Families with children		
Natick Services Council	Services - employment	Homeless Needs - Families with children	Anti-poverty Strategy		
South Middlesex Opportunity Council	Housing	Services-homeless	Homeless Needs - Chronically homeless		
Leonard Morse Hospital	Health Agency	Major Employer	Homelessness Strategy		
Natick Center Associates	Business Leaders		Anti-poverty Strategy		
Amvets Post 79, Natick, MA	Foundation		Homelessness Needs - Veterans		
VFW Post 1274, Natick, MA	Foundation		Homelessness Needs - Veterans		
NEEDHAM					
Needham Public Health and Human Service Department	Services - Health		Housing Need Assessment	Meetings	Approved ADU bylaw and new small repair grant program in addition to improved communication between Town departments.
Needham Senior Center	Services - Elderly persons		Housing Need Assessment	Meetings	
Needham Housing Authority	Public Housing Authority		Housing Need Assessment and Housing Strategy	Meetings	Improved coordination in exchanging information between the Town and NHA; coordinated work in managing resales of affordable units; provision of funding; technical support for redevelopment and new development activities.

Agencies/Groups/Organization Type	Type of Organization	Type of Organization (If serving multiple purposes)	What Section of the Plan was addressed by consultation?	How was the organization consulted?	What are the anticipated outcomes of the consultation or areas for improved coordination?
NEWTON					
2Life Communities, formerly known as Jewish Community Housing for the Elderly	Housing	Services-Elderly Persons	Non-Homeless Special Needs	2Life Communities attended the human service brown bag session, a focus group with other housing and social service providers, to express the pressing needs of the extremely-low and low-income elderly population living in Newton.	The anticipated outcomes include improved coordination with the organization and the inclusion of its pertinent input in the Consolidated Plan and Annual Action Plan.
Brookline Community Mental Health Agency	Services-homeless		Homeless Needs - Chronically homeless	Brookline Community Mental Health Center (BCMHC) attended the BoS CoC needs assessment meeting and ESG brown bag session, a focus group among housing and social service providers, to express the pressing needs of the homeless population in the Brookline, Newton, Waltham, and Watertown region.	
Citizens for Affordable Housing in Newton Development Organization (CAN-DO)	Housing		Housing Need Assessment	Acting Executive Director attended the Community Needs Assessment Meeting to provide input on the housing needs of low-income individuals and families in Newton and the WestMetro region.	
Community Day Center of Waltham	Services-homeless		Homeless Needs - Chronically homeless	Community Day Center of Waltham (CDCW) attended the BoS CoC needs assessment meeting and ESG brown bag session, a focus group among housing and social service providers, to express the pressing needs of the homeless population in the Brookline, Newton, Waltham, and Watertown region.	
Economic Mobility Pathways	Services-Employment		Non-Homeless Special Needs	Economic Mobility Pathways (EMPath) attended the human service brown bag session, a focus group comprised of housing and social service providers, to express the pressing needs of the low- to moderate-income individuals and families living in Newton.	
Family ACCESS of Newton	Services-Children		Non-Homeless Special Needs	Family ACCESS attended the community needs assessment meeting and human service brown bag session, a focus group comprised of housing and social service providers, to express the pressing needs of the low- to moderate-income individuals and families living in Newton.	
Horace Cousens Industrial Fund	Services-homeless		Housing Need Assessment	The Horace Cousens Industrial Fund had a one-on-one consultation with Division staff and attended the community needs assessment meeting to express the housing needs of the low- to moderate-income individuals and families living in Newton.	
Jewish Family and Children's Services	Services-Children		Non-Homeless Special Needs	Jewish Family & Children's Services (JF&CS) attended the human service brown bag session, a focus group comprised of housing and social service providers, to express the pressing needs of the low- to moderate-income individuals and families living in Newton.	
John M Barry Boys & Girls Club	Services-Children		Non-Homeless Special Needs	The Boys and Girls Club attended the community needs assessment meeting and human service brown bag session, a focus group comprised of housing and social service providers, to express the pressing needs of the low- to moderate-income individuals and families living in Newton.	

Agencies/Groups/Organization Type	Type of Organization	Type of Organization (If serving multiple purposes)	What Section of the Plan was addressed by consultation?	How was the organization consulted?	What are the anticipated outcomes of the consultation or areas for improved coordination?
Massachusetts Balance of State Continuum of Care	Other government - State	Housing	Homelessness Strategy	The Balance of State Continuum of Care (BoS CoC) and Division partnered to host needs assessment meetings to gather input among housing and social service providers as it relates to the homeless and at-risk of homeless population. The BoS CoC also attended a one-on-one consultation session with the Division to coordinate with the ESG program.	The anticipated outcomes include improved coordination with the organization and the inclusion of its pertinent input in the Consolidated Plan and Annual Action Plan.
Metropolitan Area Planning Council (MAPC)	Planning organization		Housing Need Assessment	Staff solicited comments from MAPC on the draft Consolidated Plan.	
Middlesex Human Service Agency	Services-homeless		Homeless Needs - Chronically homeless	Middlesex Human Service Agency (MHSA) attended the BoS CoC needs assessment meeting and ESG brown bag session, a focus group among housing and social service providers, to express the pressing needs of the homeless population in the Brookline, Newton, Waltham, and Watertown region.	
Newton Commission on Disability	Services-Persons with Disabilities		Non-Homeless Special Needs	The Commission on Disability (COD) attended a community needs assessment meeting to offer ideas for architectural access projects that the Division can undertake in the next five years. The Division also attended the COD's monthly-scheduled meeting to follow-up on these project ideas and to gather additional information on the needs of individuals with disabilities.	
Newton Community Development Foundation	Services-Elderly Persons	Services-Children	Non-Homeless Special Needs	Newton Community Development Foundation (NCDF) attended the community needs assessment meeting and human service brown bag session, a focus group comprised of housing and social service providers, to express the pressing needs of the low- to moderate-income individuals and families living in Newton.	
Newton Department of Health and Human Service	Other government - Local	Services-Health	Non-Homeless Special Needs	The Department of Health and Human Services (HHS) attended a one-on-one consultation meeting with Division staff to discuss housing and social service needs within the Newton community. The HHS is an active member of the Human Service and ESG RFP review committee and works closely with the City's Human Service and ESG subrecipients to refer low- and moderate-income individuals and families for additional resources.	The anticipated outcomes include obtaining pertinent input to strengthen the City's Human Service and ESG programs and to ensure all available resources are made accessible for all low- to moderate-income individuals and families.
Newton Department of Public Works	Other government - Local		Non-Homeless Special Needs	The Department of Public Works attended a special focus group comprised of other city departments to offer input about architectural access barriers in the community and the impact on people with disabilities and elderly population.	The anticipated outcomes include improved coordination with the organization and the inclusion of its pertinent input in the Consolidated Plan and Annual Action Plan.
Newton Department of Public Buildings	Other government - Local		Non-Homeless Special Needs	The Department of Public Buildings attended a special focus group comprised of other city departments to offer input about architectural access barriers in the community and the impact on people with disabilities and elderly population.	
Newton Department of Senior Services	Other government - Local	Services-Elderly Persons	Non-Homeless Special Needs	The Department of Senior Services attended a special needs focus group comprised of other city departments to offer input relative to the growing elderly population living in Newton as well as people with disabilities.	

Agencies/Groups/Organization Type	Type of Organization	Type of Organization (If serving multiple purposes)	What Section of the Plan was addressed by consultation?	How was the organization consulted?	What are the anticipated outcomes of the consultation or areas for improved coordination?
Newton Fair Housing Committee	Housing	Service-Fair Housing	Housing Need Assessment	Staff presented an overview of the Consolidated Planning process and conducted a needs assessment discussion at a Fair Housing Committee meeting in the Fall 2019. Members of the Committee attended the Community Needs Assessment Meeting to provide their input specifically related to Newton's affordable housing and fair housing needs. Staff attends the monthly committee meetings, where needs of the community are a regular point of discussion.	The anticipated outcomes include improved coordination with the organization and the inclusion of its pertinent input in the Consolidated Plan and Annual Action Plan.
Newton Housing Authority	Public Housing Authority	Services-Elderly Persons	Housing Need Assessment	The Newton Housing Authority (NHA) attended the community needs assessment meeting and human service brown bag session, a focus group comprised of housing and social service providers, to express the pressing needs of the low- to moderate-income elderly and families living in Newton. The NHA also assisted the Division in completing sections of the FY21-25 Consolidated Plan.	The anticipated outcomes include continued collaboration to ensure Newton is creating as many affordable housing opportunities as possible.
Newton Housing Partnership	Housing		Housing Need Assessment	Staff presented an overview of the Consolidated Planning process at a Newton Housing Partnership meeting in the Fall 2019. Members of the Partnership attended the Community Needs Assessment Meeting to provide their input specifically related to Newton's affordable housing needs. Staff attends the monthly Partnership meetings, where needs of the community are a regular point of discussion.	
Newton Planning and Development Board	Housing		Housing Need Assessment	Staff presented an overview of the Consolidated Planning process at a Planning & Development Board meeting in the Fall 2019. On February 3, 2020 the draft FY21-25 Consolidated Plan was presented to the Board. The updated Consolidated Plan and draft FY21 Annual Action Plan was presented to the Board on April 6, 2020. Staff regularly attends the monthly Planning and Development Board meetings, where needs of the community are a regular point of discussion.	
Metro West Collaborative Development	Housing		Housing Need Assessment	Metro West staff attended the Community Needs Assessment Meeting to provide input on the housing needs of low-income individuals and families in Newton and the WestMetro region.	The anticipated outcomes include improved coordination with the organization and the inclusion of its pertinent input in the Consolidated Plan and Annual Action Plan.
Pine Street Inn	Housing	Services-homeless	Homeless Needs - Chronically homeless	Pine Street Inn attended the ESG brown bag session, a focus group among housing and social service providers, to express the pressing needs of the homeless population in the Brookline, Newton, Waltham, and Watertown region.	
REACH Beyond Domestic Violence	Services-Victims of Domestic Violence		Homeless Needs - Families with children	REACH Beyond Domestic Violence had a one-on-one consultation with Divison staff and attended the human service brown bag session, a focus group comprised of housing and social service providers, to express the pressing needs of survivors of domestic violence and their families living in Newton and the surrounding communities.	

Agencies/Groups/Organization Type	Type of Organization	Type of Organization (If serving multiple purposes)	What Section of the Plan was addressed by consultation?	How was the organization consulted?	What are the anticipated outcomes of the consultation or areas for improved coordination?
Riverside Community Care	Services-Persons with Disabilities		Non-Homeless Special Needs	Riverside Community Care attended a community needs assessment meeting to offer input on the needs of low- to moderate-income individuals and families as they relate to housing, human services, and homelessness.	The anticipated outcomes include improved coordination with the organization and the inclusion of its pertinent input in the Consolidated Plan and Annual Action Plan.
The Second Step	Services-Victims of Domestic Violence		Homeless Needs - Families with children	The Second Step had a one-on-one consultation with Division staff and attended the human service brown bag session, a focus group comprised of housing and social service providers, to express the pressing needs of survivors of domestic violence and their families living in Newton and the surrounding communities.	
United Citizens for Housing Affordability in Newton (U-CHAN)	Housing		Housing Need Assessment	Staff met with U-CHAN representatives, who provided their input on the needs of Newton's low-income population, particularly relating to housing. U-CHAN surveyed low-income Newton residents in 2019 and provided staff with survey results to inform the Consolidated Plan Needs Assessment.	
SUDBURY					
Sudbury Housing Trust	Other government - Local		Housing Need Assessment	The SHT attended a Consolidated Plan public meeting comprised of Town Departments and committees to offer input relative to community-wide housing needs and strategic plan goals	Improved coordination and inclusion of the organization's input in the Consolidated Plan and Action Plan.
Sudbury Housing Authority	Public Housing Authority	Public Housing Authority	Public Housing Needs	The SHA attended a Consolidated Plan public meeting comprised of Town Departments and committees to offer input relative to community-wide housing needs and strategic plan goals. The SHA also provided direct responses to Public Housing Needs.	
Sudbury Health Department Social Worker	Other government - Local		Non-Homeless Special Needs	The social worker was consulted to provide information regarding social services available to residents experiencing homelessness or at risk for homelessness and/or with other special needs	
HOPE Sudbury	Other government - Local		Non-Homeless Special Needs	The organization provides short-term financial assistance to families with emergency assists, and was contacted directly to discuss needs addressed by the Trust funds, particularly as related to housing needs.	
WALTHAM					
Waltham Affordable Housing Trust	Housing	Other Govt. Local	Housing Needs Assessment	Housing Department staff attend quarterly meetings to provide information on emergency housing needs of city residents and data on the number of residents applying for emergency funding to prevent eviction.	A Housing Trust fund allocation to the emergency assistance program to address the needs of the near-homeless.
Waltham Council on Aging	Services - Elderly	Other Govt. Local	Non-homeless special needs	Council on Aging hosted a series of workshops for the elder community on housing resources, including financial housing assistance.	A senior community that is equipped with knowledge about the available financial resources to age in their home.
Waltham Public Schools	Services - Children	Services - Education	Homeless needs-families with children	Through monthly meetings with the Waltham Homeless Coalition, the Waltham High School McKinney Vento Liaison provides information on number of Waltham homeless families, their housing situations, runaways and overall needs of this population.	Homeless children and youth remain enrolled and have an equal opportunity to succeed in school.
Waltham Housing Authority	Housing	Public Housing Authority	Housing Needs Assessment	Tenant meeting at WHA's Beaverbrook Elderly Housing complex hosted by the Mayor's Office, the Waltham Housing Department, Waltham Housing Authority, city councillors and state representatives to discuss tenant needs in the development.	Allocation of funds for safety and ADA improvements at WHA's Beaverbrook Housing complex.
REACH	Services - Domestic Violence	Services - Domestic Violence	Homeless needs-families with children	Meeting regarding residents of Waltham Battered Womens Shelter and the REACH Board for discussion on programs that could assist women and families being sheltered.	Additional outreach for REACH residents who have transitioned out of shelter housing with TBRA rental assistance.

Agencies/Groups/Organization Type	Type of Organization	Type of Organization (If serving multiple purposes)	What Section of the Plan was addressed by consultation?	How was the organization consulted?	What are the anticipated outcomes of the consultation or areas for improved coordination?
Waltham Homeless Coalition	Services - Homeless		Homelessness Strategy	Monthly meetings held by the Waltham Police	Improved coordination between the City and social service agencies that assist the homeless, by sharing resources and information regarding known homeless people in the City and providing referrals to these individuals.
Massachusetts Housing & Shelter Alliance	Services - Homeless		Homeless needs- Chronically Homeless	The Housing Department attended a Focus Group hosted by DHCD : "Reconvening the Needs Assessment Process".	Improved coordination between local service agencies, city officials and government entities creating policy, addressing affordable homeownership, senior housing and special needs in our community, addressing affordability challenges.
Community Day Center	Services - Homeless		Homelessness Strategy	Monthly meetings with the Waltham Homeless Coalition and daily interaction through referrals to the HOME TBRA program.	Improved access to mainstream services for homeless individuals and families by providing transportation, food programs, shelters, and conducting street outreach.
The Salvation Army	Services - Homeless		Homelessness Strategy	Targeted round table discussions and public meetings with CDBG funding recipients.	Strategies to continue serving households in need of emergency assistance despite limitations on homeless prevention funds.
Waltham Partnership for Youth	Services - Education	Non-Homeless Special Needs	Anti-Poverty Strategy	Targeted round table discussions and public meetings with CDBG funding recipients.	Improved understanding of child poverty rates and housing and nutrition needs associated with families in poverty in the Waltham public school district.
Healthy Waltham, Inc	Health Agency	Non-Homeless Special Needs	Anti-Poverty Strategy	Targeted round table discussions and public meetings with CDBG funding recipients.	Improved understanding of child poverty rates and needs associated with families in poverty in the Waltham public school district.
The Waltham YMCA	Services - Youth	Non-Homeless Special Needs	Anti-Poverty Strategy	Targeted round table discussions and public meetings with CDBG funding recipients.	Improved understanding of the needs of lower income youth in Waltham.
Chesterbrook/Prospect Hill Community Centers	Services - Youth	Non-Homeless Special Needs	Anti-Poverty Strategy	Targeted round table discussions and public meetings with CDBG funding recipients.	Improved understanding of the needs of lower income youth in Waltham.
City of Waltham Health Department	Other Govt.-Local	Services Health	Lead based Paint Strategy	Quarterly meetings with the Health Department to communicate state reported high lead levels in children under six years old and ongoing code violation notifications to homeowners in the City.	Improved coordination between the Health Department and the Housing Department to better assist residents with rehabilitation loan funds for lead paint abatement and/or rehabilitation funds for health and safety improvements.
Balance of State (BoS) CoC	Other Govt.- State	Services-Homeless	Homeless Needs-Chronically Homeless	DHCD focus group meeting on July 31, 2019 at the Waltham Community Day Center.	Development of a plan to encourage local landlords to utilize the TBRA program for rental units; and a strategy that will assist the placement of homeless individuals that are unable to get emergency placement or priority housing.
WATCH	Community Development Corporation	Services-Homeless	Housing Needs Assessment	Weekly consultation with social worker concerning clients in need	Improved coordination to assist clients with eviction, homelessness, landlord/tenant issues, and access to the appropriate assistance for each household.
City of Waltham Homeless Task Force	Other Govt-Local		Homeless needs-unaccompanied youth	Police in coordination with the Housing Department and the Community Day Center complete the annual Homeless PIT Count.	Accurate data to inform the City's homeless outreach, policies, and programs.
Waltham Committee Inc.	Services-Persons with Disabilities		Non-Homeless-Special needs	Meeting with the Housing Director to discuss improvements to WCI housing and ADA improvements for individuals being served	Allocation of funding resources to improve group home housing in Waltham for disabled individuals.
Newton Wellesley Hospital	Services-Health	Health Agency	Non-Homeless special needs	Multiple meetings/working group of local social service agencies and City of Waltham officials to determine Waltham needs for the City's non-homeless special needs population.	Improved coordination between the City and local health providers

Agencies/Groups/Organization Type	Type of Organization	Type of Organization (If serving multiple purposes)	What Section of the Plan was addressed by consultation?	How was the organization consulted?	What are the anticipated outcomes of the consultation or areas for improved coordination?
WATERTOWN					
Watertown Health Department	Services-Health	Health Agency	Housing Need Assessment; Lead-Based Paint Strategy	Interview with staff; Community Wellness Assessment	The anticipated outcomes of the consultation are improved coordination and the inclusion of the organization's input in the Consolidated Plan and Annual Action Plan.
Watertown Senior Center	Services - Elderly Persons	Other Government Agency	Housing Need Assessment; Non-homeless special needs	Interview with staff; community workshops	
Council Subcommittee on Human Resources	Other Government - Local	Other Government Agency	Housing Need Assessment	Meetings	
ADA/504 Coordinator/Commission on Disability	Services - Persons with Disabilities	Other Government Agency	Housing Need Assessment; Market Analysis	Interview with staff; meetings	
Watertown Housing Partnership	Other Govt-Local		Housing Need Assessment	Meetings	
MetroWest Collaborative Development	Housing	Other - CHDO	Housing Need Assessment	Interview with staff; meetings	
Watertown Housing Authority	Public Housing Authority	Public Housing Authority	Public Housing Needs	Interview with staff; meetings	
Wayside Youth and Family Support Network	Services - Children	Services - children; Services-homeless	Housing Need Assessment	Meetings	
Live Well Watertown	Community Organization	Other Government Agency (Health Department)	Housing Need Assessment	Interview with staff	
MAPC	Planning Organization	Other - government	Housing Needs Assessment; Market Analysis	Meetings	
MBTA	Other Government - State	Public Transportation	Other - Transportation Needs	Interview with staff; meetings	Improved public transit opportunities in Watertown and adjacent communities
Barr Foundation	Other - Foundation	Public Transportation	Other - Transportation Needs	Meetings	
WAYLAND					
Wayland Housing Trust	Other government - Local		Housing Need Assessment	The WHT attended a Consolidated Plan public meeting comprised of Town Departments and committees to offer input relative to community-wide housing needs and strategic plan goals	The anticipated outcomes of the consultation are improved coordination and inclusion of the organization's input in the Consolidated Plan and Action Plan
Wayland Housing Partnership	Other government - Local		Housing Need Assessment	The WHP attended a Consolidated Plan public meeting comprised of Town Departments and committees to offer input relative to community-wide housing needs and strategic plan goals	
Wayland Housing Authority	Public Housing Authority	Public Housing Authority	Public Housing Needs	The WHA attended a Consolidated Plan public meeting comprised of Town Departments and committees to offer input relative to community-wide housing needs and strategic plan goals. The WHA also provided direct responses to Public Housing Needs.	Collaboratively develop community-wide housing goals based on community needs for inclusion in the Consolidated Plan and Annual Action Plan.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
MAPC Metro Boston 2030 Population and Housing Demand Projections	Metropolitan Area Planning Council	The Strategic Plan adopts many of the priorities and strategies included in these plans.
2015-2020 WestMetro HOME Consortium Regional Fair Housing Plan	WestMetro HOME Consortium	
Massachusetts State Plan to End Youth Homelessness	Massachusetts Executive Office of Health and Human Services	
Subsidized Housing Inventory	DHCD	
FFY19 Annual Action Plan	DHCD	
Balance of State Continuum of Care Collaborative Application	DHCD	
Balance of State Continuum of Care Point-In-Time Count	DHCD	
Balance of State Continuum of Care Housing Inventory Count	DHCD	
American Community Survey (various datasets)	U.S. Census	
Bedford Housing Study, 2019	Town of Bedford	
Bedford Comprehensive Plan, 2013	Town of Bedford	
Belmont Housing Production Plan	Town of Belmont	
Brookline Comprehensive Plan	Town of Brookline	
2016 Housing Production Plan	Town of Brookline	
Brookline Open Space Plan	Town of Brookline	
Town of Brookline Climate Vulnerability Assessment and Action Plan	Metropolitan Area Planning Council	
Strategic Asset Plan	Town of Brookline	
Major Parcels Study	Town of Brookline	
Out of School Time Report	Brookline Community Foundation	
Understanding Brookline: Emerging Trends and Changing Needs	Brookline Community Foundation	
Understanding Brookline: A Report on Poverty	Brookline Community Foundation	
Concord Comprehensive Long Range Plan	Town of Concord	
Concord Housing Production Plan, 2015	Town of Concord	
Hazard Mitigation Plan, 2017 update	Concord, Metropolitan Area Planning Council	
Framingham PHA 5-Year Plan and Annual Plan	Framingham Housing Authority	
Framingham Open Space Plan and Recreation Plan 2013	City of Framingham	
Framingham Housing Plan, Updated 2014	City of Framingham	
Southeast Framingham Neighborhood Action Plan	City of Framingham	
Downtown Framingham TOD Action Plan 2015	City of Framingham	
Lexington Housing Production Plan, 2014	Town of Lexington	
Lexington Comprehensive Plan, 2020	Town of Lexington	
Natick Housing Production Plan 2019	Natick Affordable Housing Trust	
Natick 2030+ Master Plan	Natick Planning Board	
Natick Subsidized Housing Inventory Projections, 2018	Town of Natick	
Natick Open Space Plan, 2012, Updated 2020	Natick Open Space Advisory Committee	
Natick Subsidized Housing Inventory Projections, 2018	Town of Natick	
Previous local housing plans	Town of Needham	
Needham Housing Guidelines	Town of Needham	
Assessment of Housing and Transit Options for Needham Seniors	Town of Needham	
Other HOME reports	Town of Needham	
MAPC Demographic, Economic and Housing Profiles	Town of Needham	
Needham Housing Authority Facilities Master Plan	Needham Housing Authority	
2007 Comprehensive Plan	City of Newton	
2016 Newton Leads 2040 Housing Strategy	City of Newton	
FY2019 Quarter Reports, Emergency Solutions Grant Subrecipients	City of Newton	
City of Newton, Health and Human Services Department, Division of Social Services, FY19 Annual Report	City of Newton	
Newton Department of Public Works, Accelerated Pavement Management Program, 2019 Update	City of Newton	

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

PR-15 Citizen Participation - 91.401, 91.105, 91.200(c)

1. Summarize the citizen participation process and how it had an impact on goal setting, as well as any efforts made to broaden citizen participation.

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

In an effort to reach a broad base of stakeholders, particularly low- to moderate-income individuals, the three Community Needs Assessment Meetings were held in three different locations in different parts of the city, and at different times of the day. Our first two meetings were hosted by two of our Human Service subrecipients – the Newton Community Development Foundation (NCDF) at its Weeks House mixed-income housing development and FamilyAccess, in its gymnasium. Many of the participants at the Weeks House event were low-income elderly residents of the site, and the participants at the Family Access event included a number of low- to moderate-income individuals actively engaged in a search for affordable housing in Newton.

The Consortium communities' utilized different methods to invite citizen and organizational participation, including meetings and presentations, workshops, focus groups, and interviews. Brookline and Framingham each administered a town-wide survey to assess housing needs. The survey was followed up with site visits and interviews at nonprofits and service providers to develop the Consolidated Plan. Efforts were also made by staff to engage the public at well attended community-wide events, like Brookline Day, where over 300 residents voiced their feedback on priority needs in the town.

Where possible, Consortium staff solicited participation in tandem with ongoing planning efforts. Natick wrapped the needs assessment for the Consolidated Plan into a three-year process to update the town's master plan and housing production plan. The Town's residents participated in multiple public meetings, workshops, listening sessions and online surveys about housing conditions, needs and objectives. One of Needham's central discussions on town-wide housing goals involved representatives from municipal boards and committees as well as local and regional service providers, who convened to support the transition of the Housing Authority's new executive director.

Please see sheet [PR-15: Citizen Participation](#) at the end of this section for detailed information on outreach.

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

Type of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Topic Area
BEDFORD				
Public Meeting	Non-targeted/broad community	Bedford Public Meeting with Housing Partnership, Housing Authority, Housing Trust and various town department representatives	Attendees reviewed and discussed housing needs and potential uses for HOME funds to support those needs.	NA
BROOKLINE				
Public Meeting	General (with a focus on housing stakeholders)	25 people attended this meeting of the Housing Advisory Board that was held on October 15, 2019	Attendees confirmed the list of needs the Town has developed thus far through the process and added affordable housing for families.	N/A
Public Meeting	Elderly Residents	20 individuals, including residents and practitioners that work with senior citizens, attended this meeting of the Brookline Age Friendly Committee	Support was shown for additional senior housing and preferably, housing with supportive services. The attendees also discussed the transportation and infrastructure needs in the Town.	N/A
Public Meeting	Persons with Disabilities / Non-targeted / Minorities / Non-English speakers	6 individuals attended this meeting of the Brookline Commission on Diversity, Inclusion and Community Relation's Fair Housing Committee	Attendees provided input on the need for increased affordable housing, inexpensive or free childcare, and arts programs for low-income residents.	N/A
Public Meeting	Persons with Disabilities	15 individuals attended this meeting of the Commission on Disability	Attendees provided input on the need for increased affordable and accessible housing that will provide disabled residents the opportunity to age-in-place. Discussion also focused on improved transportation and infrastructure in the Town.	N/A
Public Hearing	Non-targeted broad community	First public hearing to be at a Select Board meeting to discuss process and information collected from needs assessment and receive input	Comments focused on public outreach for the remainder of the planning process. There was also a universal recommendation to host at least two additional public outreach meetings in a neighborhood setting and to broaden outreach to more diverse residents and groups throughout the Town.	N/A
Public Event	Minorities / Persons with Disabilities / Non-targeted/broad community / Residents of Public and Assisted Housing /	Planning staff hosted a table at Brookline Day public event on September 22, 2019. Approximately 300 individuals were invited to take a survey or provide feedback on the town's highest priority needs.	Residents stated that affordable housing was the highest priority area for funding, followed by public services, economic development and public facilities.	N/A
Public Meetings	General	Public meeting held on March 11, 2020 at Egmont Veterans Public Housing Apartments.	Affordable housing should also provide options for individuals in addition to families and elders	N/A
Internet Outreach	Non-targeted broad community / minorities / residents of public and assisted housing	476 responses to a public survey that was issued from August 9th to September 30th; survey available electronically and in-person.	Respondents rated affordable housing as the most important funding activity. Within affordable housing, an emphasis was placed on creating affordable housing for low-income residents and moderate-income residents, families, and seniors. Respondents also provided input on transportation, infrastructure and social service needs in the Town.	N/A
Newspaper Ad	Minorities / Persons with Disabilities / Non-targeted/broad community / Residents of Public and Assisted Housing /	To advertise public meetings and updates on Consolidated Planning process	Completed 1/2020	N/A
CONCORD				
Public Meeting	Non-targeted/broad community	Concord Public Meeting with Housing Development Corporation, Housing Authority, Housing Foundation and various town department representatives	Attendees reviewed and discussed housing needs and potential uses for HOME funds to support those needs.	N/A

Type of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Topic Area
FRAMINGHAM				
Public Meeting	Non-targeted board community	5 residents attended the community needs assessment on December 5, 2019 at City Hall hosted by Community Development Committee	Attendees provided input relative to housing, public services, public facilities, and economic development.	N/A
Focus Group	Other- Housing Providers	5 agencies attended	Focus group participants commented that rental prices are skyrocketing, units that were affordable are no longer affordable, and maintenance upkeep is difficult. More affordable housing vouchers are needed and wait lists are growing for existing affordable housing and vouchers.	
Survey	Minorities / Non-targeted/broad community /Non-english speaking (Portuguese, Spanish)	88 responses received	Housing for people with disabilities, senior housing, energy efficiency measures, and affordable housing were the main housing needs identified by the community. The community also identified the need for supportive services for persons with disabilities, veterans, and homeless individuals and families.	N/A
LEXINGTON				
Public Meeting	Non-targeted/broad community	Lexington Public Meeting with Housing Partnership, Housing Authority, LexHAB and various town department representatives	Attendees reviewed and discussed housing needs and potential uses for HOME funds to support those needs.	N/A
NATICK				
Public Meeting	Non-targeted/broad community	20+ participants in attendance	Preserve existing affordable housing; increase affordable homeownership, help needy elderly with affordable housing options with supportive services	N/A
Public Meeting	Non-targeted/broad community	20+ participants in attendance	Allow more accessory dwelling units in single family homes; enact inclusionary zoning for affordable housing; allow greater residential density where appropriate, particularly near commuter rail lines; expand the price range of housing in town	N/A
Internet Outreach	Non-targeted/broad community	Internet survey with 183 respondents	Encourage: 1) preservation of existing stock of affordable housing; 2) production of homes across a variety of prices and 3) development of homes suited for families	N/A
NEEDHAM				
Public Meeting	Residents of Public and Assisted Housing	Meeting with elected and appointed official regarding tenant needs.	Town representatives participated in a conference call with State Representative Denise Garlick on March 30, 2020 to discuss a meeting that was held with NHA tenants in October 2019 and the new grievance procedures for NHA tenants that were approved in January 2020.	
Focus Group	Residents of Public Housing	The Town assessed the needs of NHA tenants through 12 interviews, 8 focus groups, and a survey with responses from 115 of 296 households.	Results included a wide range of comments regarding many topics including the built environment, community engagement, food access, mental health, substance use and transportation. The purposes was to inform community planning to improve NHA residents' quality of life.	
Public Meeting	Non-targeted/broad community	Needham Affordable Housing Trust meeting held on August 20, 2019	Discussion addressed a range of affordable housing activities, including HOME program needs and planning.	N/A
Public Meeting	Local elected and appointed officials, Town department representatives and area service providers.	Meeting held on August 2, 2019 to obtain input from local and regional elected and appointed officials as well as Town department representatives on housing, including NHA priorities.	Attendees provided input relative to housing and supportive services for NHA staff and tenants including services related to seniors, persons with disabilities, and very low income individuals and families.	N/A

Type of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Topic Area
NEWTON				
Public Meeting	Non-targeted/broad community	Three (3) Community Needs Assessment Sessions were held in September and October 2019. These were open to the public and held in different locations at different times of the day.	Approx. 40 attendees provided their input on the housing, accessibility, public service, homelessness, and quality of life needs and issues in Newton.	N/A
Public Hearing	Non-targeted/broad community	A public hearing was held before the Planning and Development Board on February 3, 2020 on the draft Consolidated Plan. On April 6, 2020 a public hearing was held before the Planning and Development Board on the draft FY21 - 25 Consolidated Plan and FY21 Annual Action Plan.	20 attendees at the February 3 public hearing; discussion centered around citizen participation and outreach, accessibility projects, and housing for low- and extremely low income populations. There were approximately 15 attendees at the April 6 public hearing during which comments centered around prioritizing funds for households earning 0-50% of the AMI and support for public services that increase economic status of lower income populations. The plans were recommended for approval to the Mayor.	N/A
Public Hearing	Non-target/broad community	A public hearing was held before the Zoning and Planning Committee on April 13, 2020 on the draft FY21-25 Consolidated Plan and the FY21 Annual Action Plan.	The Zoning and Planning Committee authorized the City's submission of the FY21-25 Consolidated Plan and the FY21 Annual Action Plan.	N/A
Interdepartmental Focus Groups	Non-targeted/broad community	Multiple focus groups were held with Housing and Community Development staff and other City of Newton departments in the Summer and Fall 2019.	Staff met with representatives from 7 different city departments to collect input on the housing, accessibility, public service, homelessness, and quality of life needs and issues in Newton.	N/A
Internet Outreach	Non-targeted/broad community	Staff utilized email outreach and the Dept.'s Friday Report and website to inform the public of the Consolidated Planning process.	Participants throughout the planning process provided their input on the housing, accessibility, public service, homelessness, and quality of life needs and issues in Newton.	N/A
Newspaper Ad	Non-targeted/broad community	Ad published in 12 community newspapers (WestMetro HOME Consortium region) to advertise the February 3rd and April 6th public hearing on the draft Consolidated Plan and draft Annual Action Plan.	Staff will continue to incorporate public feedback into the Consolidated Plan, as appropriate.	N/A
Meetings with Boards and Commissions	Local elected and appointed officials	Staff attended regularly scheduled meetings of the following committees to solicit input on the Consolidated Plan: Fair Housing Committee, Planning and Development Board, Commission on Disability, and Newton Housing Partnership.	Members of these commissions and boards provided their input on the housing, accessibility, public service, homelessness, and quality of life needs and issues in Newton.	N/A
Brown Bags	Area service providers	Staff held 2 brown bag sessions, focus groups with other housing and social service providers, to express the pressing needs of the extremely-low and low-income elderly population living in Newton.	Approx. 22 participants attended the ESG and Human Service brown bag sessions, providing specific information on the needs of the population and the gaps in services.	N/A
SUDBURY				
Public Meeting	Non-targeted/broad community	Sudbury Public Meeting with Housing Authority, Housing Trust and various town department representatives	Attendees reviewed and discussed housing needs and potential uses for HOME funds to support those needs.	NA
WALTHAM				
Public Meeting	Residents of Public and Assisted Housing; Persons with Disabilities	Meeting held on September 19, 2019 to receive input from residents on planned improvements to the Waltham Housing Authority, funded through the HOME program.	The Mayor, City Councillors, Housing Department Assistant Director and the Executive Director of the Waltham Housing Authority attended the resident meeting. Discussion and input focused on the WHA planned improvements.	N/A
Public Hearing	Non Targeted Outreach	City Councilors hearing regarding the use of CDBG and HOME funding within the community.	Councillors discussed the Consolidated Plan and asked programmatic questions of the Housing Division and Planning Department.	N/A

Type of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Topic Area
Survey	Non Targeted Outreach	Need assessment survey, offered electronically and in paper form, to understand the community's perspective on priority projects and funding.	Comments generally speaking to the lack of affordable housing and ADA compliant facilities in the City.	N/A
Public Meeting	Non Targeted Outreach	On April 9, 2020 the City was scheduled to hold a public meeting to release funding decisions for the upcoming grant year and release the final version of the FY21-25 ConPlan. In lieu of the meeting which was cancelled due to COVID-19, an email was distributed to the City's listserv with the proposed FY21 budget and the final 5 year plan, for comment.	Comments received were general questions regarding the funding process and how COVID-19 will impact the start of the program year (July 1, 2020).	N/A
Public Meeting	Non Targeted Outreach	Meeting to discuss the Consolidated Plan and seeking comments from community members.	Discussion centered around the next steps and when the plan will be implemented.	N/A
WATERTOWN				
Public Meeting	Elected officials and housing advocates	Meeting to discuss the Consolidated Planning process	Attendees expressed support for additional affordable housing, efforts to allow Accessory Dwelling Units, creation of a Housing Trust, creation of funding sources, and rental assistance programs.	N/A
Public Meeting	Elected officials and housing advocates	Meeting seeking input on housing needs and HOME priority allocations	Feedback included general comments regarding background on the HOME program and support for local preference for all housing programs	N/A
Public Notice via email	Non Targeted Outreach	Informing public on the Consolidated Planning process	N/A	N/A
WAYLAND				
Public Meeting	Non-targeted/broad community	Wayland Public Meeting with Housing Partnership, Housing Authority, Housing Trust and various town department representatives	Attendees reviewed and discussed housing needs and potential uses for HOME funds to support those needs.	NA
Public Hearing	Non-targeted/broad community	Board of Selectman public hearing to review and approve plan	Meeting not held yet	NA

NEEDS ASSESSMENT

Needs Assessment

NA-05 Overview

1. Needs Assessment Overview

The Needs Assessment began with data analysis and preparation in the summer of 2019. Staff from the Newton Planning and Development Department's Housing and Community Development Division (hereinafter Division staff or staff) collected and analyzed data regarding the potential needs of vulnerable populations in Newton including low- and moderate-income individuals and families, those who are homeless or at risk of homelessness, and those presumed to be low- and moderate-income including older adults, persons with disabilities and survivors of domestic violence. The information collected is included in this Needs Assessment.

The City of Newton Housing and Community Development Division (the Division) of the Department of Planning and Development works collaboratively with municipalities, city departments, housing providers and advocates, and human service and homelessness agencies throughout the community and region. These joint efforts seek to address community needs, inform investment decisions and ensure the provision of critical services like mental health care, crisis prevention, youth and elderly programming, childcare, family support, affordable housing and employment opportunities for developmentally disabled persons.

Throughout the development of the Needs Assessment, the Division's consultations with these providers and experts involved the following:

- Needs assessment sessions with other City departments and City boards and commissions, such as Health and Human Services, Economic Development, Conservation, Public Works, Senior Services, Engineering, Parks and Recreation, Transportation, the Commission on Disability, the Fair Housing Committee, and the Newton Housing Partnership;
- Brown bag lunches / discussions with our Human Service and ESG subrecipients;
- Focused meetings and phone calls with other agencies and individuals, like our Continuum of Care partners at the Balance of State (DHCD); and
- Three Community Needs Assessment Meetings open to the public in late September / early October 2019.

Through these public meetings and a variety of other outreach methods, Division staff received feedback on the data and potential needs in the community from local service providers, concerned residents, elected officials and past program beneficiaries. The data and community comments, as well as information provided from HUD that populates the following tables, all contributed to the Needs Assessment text of the Consolidated Plan.

This section will address the following:

- Housing Needs
- Disproportionately Greater Need
- Public Housing
- Homeless Needs
- Non-Homeless Special Needs
- Non-Housing Community Development Needs

NA-10 Housing Needs Assessment - 24 CFR 91.405, 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

HUD separates lower-income families into categories: extremely low-income, very low-income, and low-income based on Area Median Income (AMI) limits, which are determined annually. The WestMetro HOME Consortium is part of the Boston-Cambridge-Quincy MA-NH HUD Metro FMR Area. The current income limits for this area are shown in the table below.

FY2019 Income Limits for the Boston-Cambridge-Quincy Metro Area

Median Family Income	Income Limit Category	Persons in Family				
		1	2	3	4	5
\$113,300	Extremely Low (30%)	24,900	28,450	32,000	35,550	38,400
	Very Low (50%)	41,500	47,400	53,350	59,250	64,000
	Low Income (80%)	62,450	71,400	80,300	89,200	96,350

Source: <https://www.huduser.gov/portal/datasets/il.html>

In the WestMetro HOME Consortium, 60,119 or 31.5% of all households are considered low-income (earning 0-80% of the AMI). There are 16,604 small family households (2-4 persons) that are low-income and 2,398 large family households (5+ persons) that are low-income. A total of 20% (12,419) of low-income households include at least one person between the age of 62-74 and 24% (14,270) of low-income households include at least one person 75 years or older. In terms of families with young children, there are 6,511 low-income households with one or more children 6 years or younger.

Low-income households in the Consortium experience housing problems at a greater rate than other income categories. A total of 75% of households earning \leq 80% of the AMI experience at least one housing problem, including substandard living, overcrowding, extreme overcrowding, cost burden or extreme cost burden (see *Housing Problems Table*). Regionally, cost burden is the most common problem for Consortium households. Approximately 69% of lower income households are cost burdened (spending $>$ 30% of their income on housing costs) and 43% of lower income households are extremely cost burdened (spending $>$ 50% of their income on housing costs). See *Cost Burden >30% and Cost Burden >50% Table*.

The high percentage of low-income families experiencing cost burden is one symptom of the shortage of affordable housing in the WestMetro HOME Consortium. Less than one-third of all homeowner housing units in the Consortium are affordable to households earning \leq 80% of the AMI, consequently rental housing supplies the majority of the units that are affordable to lower income households in the Consortium (See *Housing Affordability Table*). Recent market research shows that these households struggle to find rental units priced under the Fair Market Rents established by HUD. Long public housing waitlists, with wait times stretching up to 12 years in some communities, are another indicator of the strain on the existing affordable housing inventory.

People with a disability face greater challenges than the general population in finding appropriate housing and the Consortium lacks an adequate supply of accessible, affordable housing. The elderly population, which account for approximately half of the population that has a disability, are the most cost burdened household type Consortium-wide. Regionally, there is an unmet need for housing that places older adults and persons with a disability in proximity to transportation, social and health services, and opportunities for community involvement.

In addition to the broad housing needs summarized above, the following gaps in housing and services were identified in the Consortium:

- Affordable rental units with appropriate supportive services for individuals and families at or below 60% AMI, 50% AMI and those at or below 30% AMI, including unit types and sizes appropriate for single-person households up to large family households. (Consortium-wide)
- Affordable rental units with affordable and sustainable support services for extremely low-income to moderate-income seniors looking to age in community. (Consortium-wide)
- A greater number of affordable, fully-accessible units for persons with disabilities at or below 50% AMI and those at or below 30% AMI. (Consortium-wide)
- Affordable housing that is accessible to employment centers and transit options (Consortium-wide)
- Emergency shelter and transitional housing for the homeless (Waltham)
- An overnight emergency shelter located in Newton for homeless individuals and families, with strong case management and other supportive services to assist households in identifying and obtaining permanent, stable, affordable housing in Newton. (Newton)
- A greater number of no-cost housing counselors located in Newton City Hall and throughout the community to help individuals and families navigate the complicated affordable housing search process. (Newton)
- More accessible and affordable language translation services to assist individuals and support organizations and agencies in the affordable housing search process. (Newton, Framingham)
- A greater amount of funds to be used for emergency tenant-based rental assistance, such as rapid rehousing dollars, first/last months' rent and security deposits, rental arrears, utility arrears, etc. (Newton, Waltham)

Summary of Housing Needs

Demographics	Base Year: 2009	Most Recent Year: 2015	% Change
Population	0	500,840	
Households	0	190,870	
Median Income	\$0.00	\$0.00	

HUD Table 2 - Housing Needs Assessment Demographics

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	25,105	16,989	18,025	15,014	115,730
Small Family Households	5,545	5,129	5,930	5,380	61,884
Large Family Households	594	994	810	1,053	9,125
Household contains at least one person 62-74 years of age	5,025	3,420	3,974	3,440	23,990
Household contains at least one person age 75 or older	6,095	4,575	3,600	1,909	7,958
Households with one or more children 6 years old or younger	2,635	2,053	1,823	1,927	13,478

HUD Table 3 - Total Households Table

Data Source: 2011-2015 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	680	440	299	68	1,487	63	14	85	10	172

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	249	165	80	64	558	0	30	4	0	34
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	190	260	200	149	799	75	34	73	15	197
Housing cost burden greater than 50% of income (and none of the above problems)	8,764	4,075	1,240	285	14,364	5,560	3,249	2,125	1,100	12,034
Housing cost burden greater than 30% of income (and none of the above problems)	2,385	2,765	3,515	2,330	10,995	785	2,365	2,825	2,998	8,973
Zero/negative Income (and none of the above problems)	1,859	0	0	0	1,859	670	0	0	0	670

HUD Table 4 – Housing Problems Table

Data 2011-2015 CHAS
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	9,889	4,930	1,810	570	17,199	5,700	3,329	2,290	1,125	12,444
Having none of four housing problems	5,910	4,500	6,810	6,080	23,300	1,065	4,240	7,105	7,244	19,654
Household has negative income, but none of the other housing problems	1,859	0	0	0	1,859	670	0	0	0	670

HUD Table 5 – Housing Problems 2

Data 2011-2015 CHAS

Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	3,775	2,885	1,649	8,309	1,015	1,323	1,985	4,323
Large Related	315	625	178	1,118	209	257	364	830
Elderly	3,547	1,895	1,119	6,561	4,019	3,285	2,074	9,378
Other	4,490	2,080	2,064	8,634	1,195	780	628	2,603
Total need by income	12,127	7,485	5,010	24,622	6,438	5,645	5,051	17,134

HUD Table 6 – Cost Burden > 30%

Data 2011-2015 CHAS

Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	2,845	1,300	280	4,425	915	963	900	2,778
Large Related	305	300	34	639	199	153	214	566
Elderly	2,499	1,300	355	4,154	3,425	1,635	754	5,814
Other	3,790	1,440	570	5,800	1,115	490	320	1,925
Total need by income	9,439	4,340	1,239	15,018	5,654	3,241	2,188	11,083

HUD Table 7 – Cost Burden > 50%

Data 2011-2015 CHAS
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	360	395	229	188	1,172	60	64	63	15	202
Multiple, unrelated family households	44	15	59	25	143	15	0	14	0	29
Other, non-family households	50	35	4	0	89	0	0	0	0	0
Total need by income	454	445	292	213	1,404	75	64	77	15	231

HUD Table 8 – Crowding Information - 1/2¹

Data 2011-2015 CHAS
Source:

1. Describe the number and type of single person households in need of housing assistance.

The 2010 Decennial Census, (the most current dataset that encompasses every community in the Consortium), indicates that 28% or 52,471 households in the WestMetro Consortium are comprised of householders living alone. A total of 37% (19,598 households) of householders living alone are 65 years or older. Data is unavailable to determine the exact number of single persons experiencing each type of problem. However, based on the distribution of housing

¹ Note: Table 12 – Crowding Information – 2/2 was not provided by HUD.

problems in the *Housing Problems* Table, it is likely that lower income single person households most commonly experience cost burden.

2. Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

The (2013-2017) American Community Survey indicates that 9% (45,943) of the WestMetro HOME Consortium’s population has a disability. The housing assistance needs of this population vary, however, there is a connection between disability status and decreased earning potential. A total of 54% of the Consortium’s population with a disability, 18-64 years of age, is either unemployed or not in the labor force. Persons with a disability comprise 86% (36,281) of individuals living below the poverty line in the HOME Consortium.

Persons with Disabilities in the Consortium

Community	Population with a Disability		Percent Unemployed or Not in the Labor Force	Percentage Living in Poverty
	Number	Percentage		
Bedford	1,350	9.8%	49.8%	94.6%
Belmont	2,123	8.3%	54.5%	92.5%
Brookline	4,341	7.4%	52.5%	82.2%
Concord	1,431	8.2%	58.1%	84.3%
Framingham	8,417	12.0%	51.3%	76.6%
Lexington	2,470	7.5%	56.6%	89.0%
Natick	3,155	8.9%	57.2%	92.8%
Needham	2,302	7.7%	49.6%	91.6%
Newton	8,044	9.1%	49.8%	91.3%
Sudbury	1,288	7.0%	54.5%	97.1%
Waltham	6,503	10.4%	38.4%	85.3%
Watertown	3,545	10.3%	59.4%	83.0%
Wayland	974	7.1%	40.4%	89.4%
TOTAL	45,943	9.2%	53.9%	86.3%

Source: 2013-2017 American Community Survey

According to the National Coalition Against Domestic Violence, in Massachusetts, one in three women and one in four men will experience physical violence, sexual violence, or stalking by an intimate partner in their lives. In FY19 (FFY18), the City of Newton provided ESG funding to five nonprofit organizations, supporting four emergency shelter programs, two homelessness prevention programs, and two rapid re-housing programs. During the FY19 (FFY18) program year, these nonprofit organizations reported serving 1,025 individuals, of which 87% had a mental or physical disability and 20% were victims of domestic violence.

In Brookline, the Police Department employs a Domestic Violence Advocate program to provide support to victims of domestic violence, issue restraining orders, refer to the domestic violence unit, and arrange for short term emergency shelter, etc. The Brookline Community Mental Health Center staff work closely with Second Step, which operates transitional housing and a wide variety of supportive services for survivors of domestic violence and their children. In

addition, the Brookline Housing Authority ensures that women, men or families are not discriminated against, denied access to or evicted from public or subsidized housing programs solely because of their status as victims of domestic violence, dating violence, sexual assault, or stalking. Victims who are fleeing domestic violence situations are referred to social agencies. The Brookline Housing Authority has a waitlist of 549 victims of domestic violence for their state-owned properties, and 13 individuals for Section 8 assistance.

3. What are the most common housing problems in your community?

Regionally, cost burden is the most common problem for households. In the WestMetro HOME Consortium slightly over 24% of households are considered cost burdened (spending > 30% of their income on housing costs) and 14% of these households are extremely cost burdened (spending >50% of their income on housing costs). This problem is more acute among lower income households due to their limited financial resources. A total of 69% of lower income households in the Consortium are cost burdened and 43% of lower income households are extremely cost burdened. See *Cost Burden >30% and Cost Burden >50%* Table.

Bedford, Concord, Lexington, Sudbury and Wayland are affluent communities in Metro Boston and as such, rental inventory is low, market rents are very high, and often even the affordable rents are too costly for single persons and families. A least 25 percent of households in these communities are cost burdened. Specifically, households at a rate of 34% in Bedford, 35% in Concord, 29% in Lexington, 26% in Sudbury and 25% in Wayland report spending more than 30% of their income on housing.

Brookline's rents are among the most expensive in the Commonwealth. The high cost of housing continues to displace existing residents, including seniors on fixed incomes and municipal employees. An online survey cited in the Town's Housing Production Plan reports that one out of every four respondents said it is likely that they will move out of Brookline in the next five years, and most of them cited high housing/living costs as the primary reason. The mismatch between income and housing costs in Brookline is considerably more problematic for households with incomes under 80% of AMI, which account for 30% of the town's population. Brookline residents who meet the Town's affordable housing lottery application requirements are typically paying a very high proportion of income on rent and utilities in order to have access to the Brookline's excellent public services, including the public school system.

The Brookline Housing Authority (BHA), which generally serves households earning less than 30% of the Area Median Income, has a waiting list for senior housing units of approximately 2,551 households and 6,033 households for family housing. The BHA reports that about 10-20% of these households have a Brookline live/work preference or an extreme needs preference such as fleeing domestic violence, homelessness, facing eviction, or fire/natural disaster victim. Even preference households need to wait a minimum of 24 to 36 months before securing a BHA affordable unit.

A total of 30% of Natick households are cost burdened. Approximately 45% of renters are cost burdened and 18% are severely cost burdened. Respondents to Natick's most recent housing needs and interest survey reinforce this data by highlighting a lack of affordable housing for low-income households, particularly low-income tenants, as well as problems with housing conditions and maintenance of rental housing.

A total of 2,754 households, or 26% of Needham households are experiencing cost burdens, including 1,154 (11%) with severe cost burden. Of the 2,093 households earning at or below 80% of median income, 1,489 (71%) were spending more than 30% of their income on housing and of these, 1,059 (51%) were spending more than half their income on housing. Renters are more likely to be cost burdened than homeowners. The percentage of lower income households experiencing cost burden has increased since the computation of the 2007-2011 CHAS data, demonstrating a continued housing crisis for this population.

In Newton, housing problems in general are a common issue, as a quarter of Newton homeowners and approximately 45% of Newton renters face at least one housing problem. These problems range from substandard housing facilities (lacking complete plumbing or kitchen facilities), overcrowding, and housing cost burden. Approximately 31% of all Newton households meet the definition of being cost burdened. This problem is most common among households with incomes at or below 50% AMI, as 58% of these low-income households are severely housing cost burdened. Of the total number of extremely low- and low-income renter households in Newton, 55% are severely housing cost burdened; and of the total number of extremely low- and low-income owner households in the city, 62% are severely housing cost burdened.

4. Are any populations/household types more affected than others by these problems?

More renters than homeowners in the Consortium experience cost burden. A total of 24,622 renters and 17,134 owners are cost burdened (See Cost Burden >30% Table). In terms of renters, other households (e.g. single persons living alone or unrelated individuals living together) experience cost burden at the highest level (8,634 individuals or 35%), followed by small related (34%), and elderly (27%) households. Extremely low-income renters are impacted (12,127 individuals or 49%) more largely by cost burden than renter households earning >30-50% of AMI (30%) and renter households earning >50-80% of AMI (20%).

Extremely low-income owners are also most impacted by cost burden (6,438 individuals or 38%) followed by owner households earning >30-50% of AMI and (33%) of owner households earning > 50-80% of AMI. Elderly owners (9,378 individuals or 55%) disproportionately experience this housing problem in comparison with small related families, large related families and other households (e.g. single persons living alone or unrelated individuals living together). A total of 43% (4,019) of elderly cost burdened households are extremely low income. See *Cost Burden >30%* Table.

More renters (15,018) than homeowners (11,083) are extremely cost burdened (*see Cost Burden >50% Table*). Extremely low-income renters and owners disproportionately experience this housing problem. Renter households earning below 30% of the AMI comprise 63% of extremely cost burdened renters and owners households earning below 30% of the AMI comprise 51% of extremely cost burdened owners. Other renter households (e.g. single persons living alone or unrelated individuals living together) are most impacted (5,800 individuals or 38%) by extreme cost burden, while elderly homeowners (5,814 individuals or 53%) are most affected by extreme cost burden.

Over a quarter (24%) of all Brookline households spend more than 30 percent of their monthly income towards housing costs and nearly one-fifth (18%) of all Brookline households pay more than 50% of household incomes toward housing costs. Low-income renters make up almost one-fifth of all Brookline households and many are severely cost burdened. Low-income homeowners are also affected by this housing problem in Brookline. Lower income small families with children are the population most vulnerable to be at-risk of homelessness in Brookline, with an urgent need for affordable housing, along with the elderly and people with disabilities.

In Bedford, Concord, Lexington, Sudbury and Wayland renters are also more likely to be cost burdened than owners. A total of 53% of renters in Bedford and Concord, 38% of renters in Lexington, 30% of renters in Sudbury and 34% in Wayland report spending more than 30% of their income on housing. High real estate prices make it difficult for low and moderate income households to enter or stay in the community and like the region at large, a high percentage of lower income households are affected by this problem. This ranges from 42% of households earning <80% of the AMI in Sudbury to 58% of households earning <80% of AMI in Concord. The growing population of older residents find it increasingly difficult to remain in their existing homes as land values rise, increasing the cost of local property taxes and in turn many elderly households become classified as housing cost burdened. In each of these five communities, elderly households experience this problem more often than other household types.

Approximately 60% of Framingham residents are either cost burdened or severely cost burdened. Renters are more likely to be cost burdened (50%) than homeowners (32%). Over 56% of elderly households are cost burdened. A total of 39% of Framingham residents qualify for subsidized housing based on household income.

In Natick lower income renters, particularly families and people with special needs (veterans, the disabled, etc.) and households with extremely low incomes are more affected by cost burden. Nearly 45% of all Natick renters and over 50% of elderly households in the town are spending more than 30% of their income on housing.

In Needham, both seniors and families are experiencing substantial housing cost burden. For example, 924 elderly households (62 years of age or older) are housing cost burdened, including 609 households earning at or below 80% AMI. An estimated 42% (500) of elderly, lower-income households are extremely cost burdened. With regard to families, 364 family

households earning at or below 80% of the area median income are housing cost burdened, including 289 or about 80% who pay more than half of their income on housing. A total of 155 of these households are renters.

Renters are generally more cost burdened than homeowners in Newton, and renter households with incomes at or below 50% AMI are the most likely to experience this problem. More specifically, it is elderly (62 years or older) and small family renter households (4 or less individuals) who face this problem most prevalently. For example, of the total number of low- to moderate-income renter households in the City that are housing cost burdened, 34% are elderly households, and 39% are small family households. This trend continues with elderly homeowners. Of the total number of low- to moderate-income owner households in the City that are housing cost burned, 62% are elderly households.

The majority of affordable units that are built through large development in Waltham target households at 80% of the Area Median Income, perpetuating the housing gap for low and extremely-low income level households. Waltham has amended its affordable housing zoning ordinance to include households at 60% of AMI, but lengthy waitlists for all subsidized housing serve as evidence that the elderly and disabled will continue to need affordable units and/or subsidies. Although new high rise multi-unit housing has increased the overall supply of rental housing in the city, there are fewer large family units compared to one and two bedroom units. High housing costs in Boston and the surrounding affluent communities have driven more renters into Waltham because of its easy commute into Boston by commuter rail, thereby reducing the amount of affordable units to Waltham's low-income renters.

Data from MAPC (2013-2017) indicates that renters outnumber owners in Watertown. Over 36% of those renters are cost burdened, or severely cost burdened. As a Millennial Peak community, 36% of Watertown's population is age 20-35, although 34% of the population is age 50 or older. The bulk of the housing stock in Watertown is older, and a significant proportion is two-family. At the same time, Watertown has experienced spikes in the production of market-rate multi-family, most recently from 2014-2017. This has allowed for additional Inclusionary Zoning units, but not at a sufficient rate to meet the demand. The Council on Aging/Senior Center employs a social worker who indicates that renting in Watertown is particularly difficult for seniors. A significant portion of these older adults struggle to find housing because of poor credit history and a lack of stable income to supplement Social Security.

- 5. Describe the characteristics and needs of low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance**

In FY19 (FFY18), Brookline Community Mental Health Center (BCMHC) and The Second Step (TSS) received ESG funding to support their Homelessness Prevention programs, which assisted

at-risk individuals and families living in the Brookline-Newton-Waltham-Watertown region. In accordance with HUD requirements, the highest priority applicants for homelessness prevention services are those living in a habitable unit, but who have been notified in writing that they are being evicted within twenty-one (21) days after the date of their application for assistance.

During the FY19 (FFY18) program year, BCMHC and TSS served 45 individuals through this program. Of those served, 20 individuals were children aged 17 years and younger, and a majority served were female (73%). In addition, 24% of the individuals served were survivors of domestic violence, and 42% of the individuals reported having a mental or physical disability.

In consulting with housing and service providers, many made note that their clients with a mental illness were not receiving the support that they needed. Clients who do not have a car or access to proper public transportation struggle to meet their appointments. In addition, clients have faced difficulty accessing adequate legal representation in a variety of areas, including, but not limited to: immigration status, custody, credit, housing, and CORI issues.

Many of the families receiving rapid re-housing assistance throughout the HOME Consortium face similar issues that prevent them from securing a housing unit in the first place. These needs range from insufficient income to secure a unit or maintain rent to a lack of affordable housing inventory in the community. Supplementing formerly homeless households with supportive services and rental assistance over a one to three year period is often not enough time for them to transition to a fully stabilized housing situation.

Waltham's full rental TBRA program is designed to bridge households into public subsidized housing. Applicants who receive the HOME subsidy must apply for public housing to be eligible for the full rental assistance program. Those households that apply for public housing and remain income eligible can renew the TBRA subsidy annually until a unit becomes available. The long-term HOME TBRA housing subsidies have significantly impacted recipients in Waltham, providing housing stability while households wait for public housing units. During the three years of program operation, the Waltham Housing Division has found that households at or below 60% of the Area Median Income continue to need long-term subsidies to maintain their housing, jobs and healthcare.

6. If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

Not applicable. Newton nor the HOME Consortium have an estimated at-risk population.

7. Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness:

In Newton, housing instability and an increased risk of homelessness are directly linked to the insufficient supply of deed-restricted affordable housing options for a diversity of income levels and household types. Escalating rents, stagnant wages, and increased demand on existing affordable units have forced many families and individuals to leave Newton. The lack of units affordable to households at or below 50% AMI, in particular, has created an unsustainable environment for Newton's most vulnerable families, seniors, and individuals. Additionally, a lack of fully-accessible, affordable units for individuals at or below 50% AMI, and those at or below 30% AMI, continues to create instability for those persons with disabilities and elders on fixed-incomes.

The communities in the Consortium note that the high cost of housing and the existing barriers to access affordable housing due to market forces, lead to instability and increased risk of homelessness. Of particular concern are those on fixed incomes, including seniors and persons with disabilities. In some cases, these households' incomes are less than the monthly rent for the affordable 40B units. The Town of Needham notes that even recent occupants of affordable rental units will be hard-pressed to afford rent increases that will be based on the 10% increase in HUD Area Median Income limits.

8. Describe broadband needs in housing occupied by low- and moderate-income households based on an analysis of data for its low- and moderate-income neighborhoods.

In Newton and throughout the WestMetro HOME Consortium, access to broadband service in household units occupied by low- and moderate-income households was not identified as a priority need. While in-home access did not surface as an issue, the costs associated with the service were discussed as being an additional challenge for low- and moderate-income households. Some communities discussed the idea of including the cost of broadband service in the utility allowance requirement for many deed-restricted affordable units.

**NA-15 Disproportionately Greater Need: Housing Problems - 91.405, 91.205
(b)(2)**

1. Introduction

The purpose of this section is to assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole. A disproportionately greater need exists when the percentage of households within a category is at least ten percentage points higher than the percentage of households in the category as a whole.

Housing problems, as defined below, can constrain a household from having basic housing necessities, such as a functional bathroom or kitchen, cause health and sanitary issues due to overcrowding, and create economic burdens. This data provides insight into the need to provide decent, safe, sanitary and affordable housing, and whether a greater need for such housing exists for individual racial or ethnic groups.

The four housing problems are:

- 1.) Lacks complete kitchen facilities,
- 2.) Lacks complete plumbing facilities,
- 3.) More than one person per room,
- 4.) Cost Burden greater than 30%

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	18,760	3,810	2,529
White	13,460	2,733	1,559
Black / African American	1,019	270	65
Asian	1,714	395	583
American Indian, Alaska Native	4	0	4
Pacific Islander	0	0	0
Hispanic	2,249	345	280

HUD Table 9 - Disproportionally Greater Need 0 - 30% AMI

Data 2011-2015 CHAS
Source:

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	13,364	3,625	0
White	9,864	2,965	0
Black / African American	509	195	0
Asian	1,320	214	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	1,360	145	0

HUD Table 10 - Disproportionally Greater Need 30 - 50% AMI

Data 2011-2015 CHAS
Source:

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	10,435	7,565	0
White	8,155	5,810	0
Black / African American	399	340	0
Asian	930	665	0
American Indian, Alaska Native	0	29	0
Pacific Islander	10	25	0
Hispanic	850	395	0

HUD Table 11 - Disproportionally Greater Need 50 - 80% AMI

Data 2011-2015 CHAS
Source:

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	6,994	8,015	0
White	5,524	6,500	0
Black / African American	199	229	0
Asian	724	505	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
American Indian, Alaska Native	4	0	0
Pacific Islander	0	0	0
Hispanic	404	625	0

HUD Table 12 - Disproportionally Greater Need 80 - 100% AMI

Data 2011-2015 CHAS

Source:

2. Discussion

Across the entire WestMetro HOME Consortium, a high percentage of extremely low-income to moderate-income households experience housing problems, regardless of race or ethnicity. Of the approximately 25,000 extremely low-income households (0-30% AMI) in the consortium, 75% has one or more housing problems. Of the approximately 17,000 low-income households (30-50% AMI) in the consortium, 79% has one or more housing problems. Moderate-income households (50-80% of AMI) experience housing problems at a slightly lower rate: 58% of the 18,000 households at this income level. Households earning between 80-100% of AMI experience housing problems at a rate of 47% (of the approximately 15,000 total households in this income category throughout the WestMetro HOME Consortium).

Across all income levels in the WestMetro HOME Consortium, housing problems are more common amongst Asian and Hispanic households than the jurisdiction as a whole (meaning, across all thirteen WestMetro HOME Consortium communities).

Like the WestMetro HOME Consortium, a large percentage of extremely low-income to moderate-income households in Newton experience housing problems, regardless of race or ethnicity. Low-income Newton households (30-50% AMI) have the highest rate of housing problems (86%), while households earning between 80-100% AMI experience housing problems at a rate of 57%.

In Newton, white households have proportionately fewer housing problems compared to the jurisdiction as a whole. Hispanic households, in particular, experience a disproportionately greater need across the different income categories: 30-50% AMI – 14% greater; 50-80% AMI – 33% greater; and 80-100% AMI - 43% greater. Black / African Americans also experience housing problems at a greater rate than the jurisdiction as a whole: 0-30% AMI – 7% greater and 50-80% AMI – 9% greater. Asian households also experience greater rates: 0-30% AMI – 4% greater and 80-100% AMI – 18% greater. In the 80-100% AMI category, American Indian / Alaska Native households have a disproportionately greater need than the jurisdiction as a whole (43% greater).

Of the approximately 2,000 households in Newton earning between 80% and 100% AMI,

Extremely low-income (0- 30% AMI):

Although a disproportionately greater need does not exist within this income level across the WestMetro HOME Consortium, more extremely low-income Hispanic households (4% greater) face housing problems than the jurisdiction as a whole in this income category.

In Newton, more extremely low-income Black/African American households (7% greater) and Asian households (4% greater) face housing problems than the jurisdiction as a whole in this income category.

Low-income (30 - 50% AMI):

In the WestMetro HOME Consortium, Hispanic households within this income category experience a disproportionately greater need, as 90% of these households has one or more housing problems (12% greater than the jurisdiction as a whole). In this income category, Asian households also experience one or more housing problems at a greater rate than the jurisdiction as a whole (7% greater).

In Newton, low-income Hispanic households have a disproportionately greater need (14% greater) compared to the jurisdiction as a whole.

Moderate-income (50 – 80%):

Across the HOME Consortium, moderate-income Hispanic households have a disproportionately greater need than the jurisdiction as a whole in this income category (10% greater).

In Newton, Hispanic households within this income category experience a disproportionately greater need, as 100% of these households has one or more housing problems (33% greater than the jurisdiction as a whole). While not technically defined as a disproportionately greater need, moderate-income Black/African American households also experience housing problems at a greater rate than the jurisdiction as a whole (9% greater).

80 – 100% Income:

In the consortium, Asian households experience a disproportionately greater need than the jurisdiction as a whole (12% greater).

In Newton, Asian, American Indian / Alaska Native, and Hispanic households at this income level all experience a disproportionately greater need than the jurisdiction as a whole (18%, 43%, and 43% greater, respectively).

NA-20 Disproportionately Greater Need: Severe Housing Problems - 91.405, 91.205 (b)(2)

1. Introduction

The purpose of this section is to examine specific needs categories to determine whether individual races or ethnic groups are experiencing disproportionately greater needs concerning severe housing problems. A disproportionately greater need exists when the percentage of households within a category is at least 10 percentage points higher than the percentage of households in the category as a whole.

Severe housing problems, as defined below, can constrain a household from having basic housing necessities, such as a functional bathroom or kitchen, cause health and sanitary issues due to overcrowding, and create economic burdens. This data provides insight into the need to provide decent, safe, sanitary and affordable housing, and whether a greater need for such housing exists for individual racial or ethnic groups.

The four severe housing problems are:

- 1.) Lacks complete kitchen facilities,
- 2.) Lacks complete plumbing facilities,
- 3.) More than 1.5 persons per room,
- 4.) Cost Burden greater than 50%

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	15,589	6,975	2,529
White	11,474	4,700	1,559
Black / African American	784	520	65
Asian	1,499	605	583
American Indian, Alaska Native	0	4	4
Pacific Islander	0	0	0
Hispanic	1,553	1,040	280

HUD Table 13 – Severe Housing Problems 0 - 30% AMI

Data Source: 2011-2015 CHAS

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	8,259	8,740	0
White	6,084	6,745	0
Black / African American	244	465	0
Asian	1,005	523	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	750	745	0

HUD Table 14 – Severe Housing Problems 30 - 50% AMI

Data 2011-2015 CHAS
Source:

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,100	13,915	0
White	3,250	10,725	0
Black / African American	119	630	0
Asian	495	1,115	0
American Indian, Alaska Native	0	29	0
Pacific Islander	0	35	0
Hispanic	230	1,000	0

HUD Table 15 – Severe Housing Problems 50 - 80% AMI

Data 2011-2015 CHAS
Source:

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,695	13,324	0
White	1,304	10,709	0

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Black / African American	54	380	0
Asian	218	1,025	0
American Indian, Alaska Native	4	0	0
Pacific Islander	0	0	0
Hispanic	53	975	0

HUD Table 16 – Severe Housing Problems 80 - 100% AMI

Data 2011-2015 CHAS
Source:

2. Discussion

Across the entire WestMetro HOME Consortium, a high percentage of extremely low-income and low-income households experience housing problems, regardless of race or ethnicity. Of the approximately 25,000 extremely low-income households (0-30% AMI) in the consortium, 62% has one or more severe housing problems. Of the approximately 17,000 low-income households (30-50% AMI) in the consortium, 49% has one or more severe housing problems. Moderate-income households (50-80% of AMI) experience housing problems at a slightly lower rate: 23% of the 18,000 households at this income level. Households earning between 80-100% of AMI experience severe housing problems at a much lower rate of 11% (of the approximately 15,000 total households in this income category throughout the WestMetro HOME Consortium).

Across all income levels in the WestMetro HOME Consortium, severe housing problems are more common amongst Asian households than the jurisdiction as a whole (meaning, across all thirteen WestMetro HOME Consortium communities).

Like the WestMetro HOME Consortium, a large percentage of extremely low-income and low-income households in Newton experience severe housing problems, regardless of race or ethnicity. Extremely low-income Newton households (0-30% AMI) have the highest rate of severe housing problems (63%). Low-income households (30-50% AMI) experience severe housing problems at a rate of 57%; moderate-income households (50-80% AMI) experience severe housing problems at a rate of 25%; and households earning between 80-100% AMI experience severe housing problems at a lower rate of 18%.

In Newton, Asian, Black / African American, and Hispanic households have a disproportionately greater need compared to the jurisdiction as a whole, in terms of experiencing severe housing problems. Asian households experience greater rates of severe housing problems across three out of the four income categories analyzed: 0-30% AMI and 30-50% AMI – 9% greater; and 50-80% AMI – 26% greater. Low-income and moderate-income Black / African American households experience greater rates of severe housing problems than the jurisdiction as a

whole: 30-50% AMI – 9% greater; and 50-80% AMI – 22% greater. Hispanic households experience a disproportionately greater need at the 80-100% AMI level: 41% greater than the jurisdiction as a whole.

Extremely low-income (0- 30% AMI):

Although a disproportionately greater need does not exist within this income level across the WestMetro HOME Consortium, a slightly greater number of extremely low-income White households (3% greater) face severe housing problems than the jurisdiction as a whole in this income category.

In Newton, more extremely low-income White households (1% greater) and Asian households (9% greater) face severe housing problems than the jurisdiction as a whole in this income category.

Low-income (30 - 50% AMI):

In the WestMetro HOME Consortium, Asian households within this income category experience a disproportionately greater need: 12% greater than the jurisdiction as a whole. Hispanic households within this income category experience slightly greater rates of severe housing problems than the jurisdiction as a whole (2% greater).

In Newton, low-income Black / African American and Asian households experience greater rates of severe housing problems than the jurisdiction as a whole (both at 9% greater).

Moderate-income (50 – 80%):

Across the HOME Consortium, moderate-income Asian households have a greater need than the jurisdiction as a whole in this income category (8% greater), in terms of severe housing problems.

In Newton, Black / African American and Asian households within this income category experience a disproportionately greater need (22% greater and 26% greater, respectively). Hispanic households face severe housing problems at a slightly greater rate than the jurisdiction as a whole (1%).

80 – 100% Income:

In the consortium, Black / African American and Asian households experience a slightly greater need than the jurisdiction as a whole (1% and 6% greater, respectively).

In Newton, Hispanic households at this income level experience a disproportionately greater need than the jurisdiction as a whole (41% greater), in terms of experiencing severe housing problems.

NA-25 Disproportionately Greater Need: Housing Cost Burdens - 91.405, 91.205 (b)(2)

1. Introduction

The purpose of this section is to assess the need of any racial or ethnic group that has a disproportionately greater need in comparison to the needs of that category of need as a whole. A disproportionately greater need exists when the percentage of households within a category is at least ten percentage points higher than the percentage of households in the category as a whole.

This section analyzes housing cost burdens across the WestMetro HOME Consortium. A cost-burdened household is one that pays greater than 30% of its income on housing-related costs. A severely cost-burdened household is one that pays more than 50% of its income on housing-related costs.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	126,465	32,463	29,298	2,624
White	103,515	24,375	22,518	1,559
Black / African American	2,885	1,275	1,025	114
Asian	13,245	3,165	3,170	603
American Indian, Alaska Native	105	4	4	4
Pacific Islander	25	10	0	0
Hispanic	4,830	3,064	2,088	295

HUD Table 17 – Greater Need: Housing Cost Burdens AMI

Data Source: 2011-2015 CHAS

2. Discussion

Across the entire WestMetro HOME Consortium, 32% of households (out of the approximately 190,000 total households in the consortium) experience housing cost burden. Black / African American and Hispanic households experience a disproportionately greater need than the jurisdiction as a whole (11% greater and 18% greater, respectively).

Of the approximately 61,000 cost-burdened households in the consortium, 47% are severely housing cost-burdened, paying greater than 50% of their income on housing-related costs. According to 2011-2015 CHAS data, White, Asian, and American Indian / Alaska Native households are severely housing cost-burdened at slightly greater rates than the jurisdiction as a whole (1%, 1%, and 3% greater).

In Newton, 31% of households (out of the approximately 31,000 total households in Newton) experience housing cost burden. Black / African American and Hispanic households experience a disproportionately greater need than the jurisdiction as a whole (10% and 30% greater, respectively).

Of the approximately 9,500 cost-burdened households in Newton, 46% are severely housing cost-burdened, paying greater than 50% of their income on housing-related costs. According to 2011-2015 CHAS data, Black / African American, Asian, and American Indian / Alaska Native households are severely housing cost-burdened at greater rates than the jurisdiction as a whole (8%, 8%, and 54% greater).

NA-30 Disproportionately Greater Need: Discussion - 91.205 (b)(2)

1. Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

When a percentage of households within a racial or ethnic group is at least ten percentage points higher than the percentage of households in the jurisdiction as a whole, that racial or ethnic group is defined as having a disproportionately greater need. The incidence of housing problems and severe housing problems is tracked as part of this analysis. Housing problems include: housing that lacks complete kitchen facilities, housing that lacks plumbing facilities, overcrowding (more than one person per room), and cost burden (expending more than 30 percent of household income toward housing costs). Severe housing problems include: housing that lacks complete kitchen facilities, housing that lacks complete plumbing facilities, severe overcrowding (more than 1.5 persons per room); severe cost burden (expending more than 50 percent of household income toward housing costs).

Incidence of housing problems is indicative of a shortage of affordable housing stock. This results in lower-income households spending more than 30% of their income on housing costs, or in some cases living in substandard housing. Populations disproportionately affected by housing problems in the Consortium need safe, affordable rental and homeowner housing.

Disproportionately Greater Need: Housing Problems

In the WestMetro HOME Consortium, low-income Hispanic households (30-50% AMI) experience a disproportionately greater need, as 90% of these households has one or more housing problems (12% greater than the jurisdiction as a whole). Across the HOME Consortium, moderate-income Hispanic households (50-80% AMI) have a disproportionately greater need than the jurisdiction as a whole in this income category (10% greater). Asian households with incomes between 80-100% AMI experience a disproportionately greater need than the jurisdiction as a whole (12% greater).

In Newton, low-income Hispanic households (30-50% AMI) have a disproportionately greater need (14% greater) compared to the jurisdiction as a whole. Moderate-income Hispanic households (50-80% AMI) experience a disproportionately greater need, as 100% of these households has one or more housing problems (33% greater than the jurisdiction as a whole). For households earning 80-100% AMI, Asian, American Indian / Alaska Native, and Hispanic households within this income level all experience a disproportionately greater need than the jurisdiction as a whole (18%, 43%, and 43% greater, respectively).

Disproportionately Greater Need: Severe Housing Problems

Across the WestMetro HOME Consortium, low-income Asian households (30-50% AMI) experience a disproportionately greater need: 12% greater than the jurisdiction as a whole.

In Newton, Asian, Black / African American, and Hispanic households have a disproportionately greater need compared to the jurisdiction as a whole, in terms of experiencing severe housing

problems. Asian households experience a disproportionately greater need at the 50-80% AMI level – 26% greater. Low-income and moderate-income Black / African American households experience greater rates of severe housing problems than the jurisdiction as a whole (9% greater and 22% greater, respectively). Hispanic households experience a disproportionately greater need at the 80-100% AMI level: 41% greater than the jurisdiction as a whole.

Disproportionately Greater Need: Housing Cost Burden

Across the entire WestMetro HOME Consortium, 32% of households (out of the approximately 190,000 total households in the consortium) experience housing cost burden (greater than 30% of income spent on housing-related costs). Black / African American and Hispanic households experience a disproportionately greater need than the jurisdiction as a whole (11% greater and 18% greater, respectively).

In Newton, 31% of households (out of the approximately 31,000 total households in Newton) experience housing cost burden. Black / African American and Hispanic households experience a disproportionately greater need than the jurisdiction as a whole (10% and 30% greater, respectively).

Of the approximately 9,500 cost-burdened households in Newton, 46% are severely housing cost-burdened, paying greater than 50% of their income on housing-related costs. According to 2011-2015 CHAS data, American Indian / Alaska Native households experience a disproportionately greater need than the jurisdiction as a whole (54% greater).

Other considerations:

In consultation with subrecipients, many nonprofit organizations have expressed the need to reduce language barriers in the City of Newton and the surrounding communities.

Approximately 26% of the City's population speaks a language other than English at home, of which 30% do not speak English very well. Households who experience linguistic isolation, in which no one in the household ages 14 years and older speaks English very well, have difficulty navigating the housing market, understanding their fair housing rights, and accessing the public services that they need.

Primary Language Spoken at Home, City of Newton

Subcategory	Estimate	Percentage
Population 5 years and over	83,806	83,806
English	61,906	73.9%
Language other than English	21,900	26.1%
Of those speaking a language other English, individuals who do not speak English less than “very well”	6,517	30.0%
Other Languages		
Spanish	3,609	4.3%
Other Indo-European languages	8,747	10.4%
Asian and Pacific Islander languages	8,128	9.7%
Other Languages	1,416	1.7%

Source: 2012-2016 ACS 5-Year Estimates

Other Consortium Communities:

Hispanic, Asian, and American Indian/Alaskan Native households living in Brookline have a disproportionately greater need than the jurisdiction as a whole. The low-income Hispanic population experiencing at least one housing problem is over 18 percentage points above the general population. Data shows that 100% (170) of Hispanic households earning 30-50% of the Area Median Income experience one or more housing problems. The percentage of Asians that are experiencing at least one severe housing problem is greater than the jurisdiction as a whole in the following income categories: 0-30% AMI (+ 15 percentage points); 30-50% AMI (+11 percentage points); 80-100% AMI (+18 percentage points). Extremely low-income American Indian, Alaska Native households living in Brookline and experiencing housing cost burden is 40 percentage points higher than the jurisdiction as a whole.

Asian and American Indian/Alaskan Native households living in Framingham have a disproportionately greater need than the jurisdiction as a whole. The low-income Asian populations experiencing one or more housing problems is 17 percentage points above the general population. The percentage of Asian households that are experiencing at least one severe housing problem is greater than the jurisdiction as a whole in the following income categories: 30-50% AMI (+19 percentage points) and 80-100% AMI (+11 percentage points). Extremely low-income Asian and American Indian/Alaska Native households, living in Framingham, and experiencing housing cost burden is 16 and 29 percentage points (respectively) higher than the jurisdiction as a whole.

The Black / African American households living Needham have a substantially lower median income level at \$34,899 compared to \$143,954 for White households, \$164,464 for Asian households, and \$142,832 for Hispanic households. Consequently, more Black / African American households are likely relying on subsidized housing or experiencing greater cost burdens in comparison to other racial or ethnic minorities in Needham.

2. If they have needs not identified above, what are those needs?

All known needs have been identified.

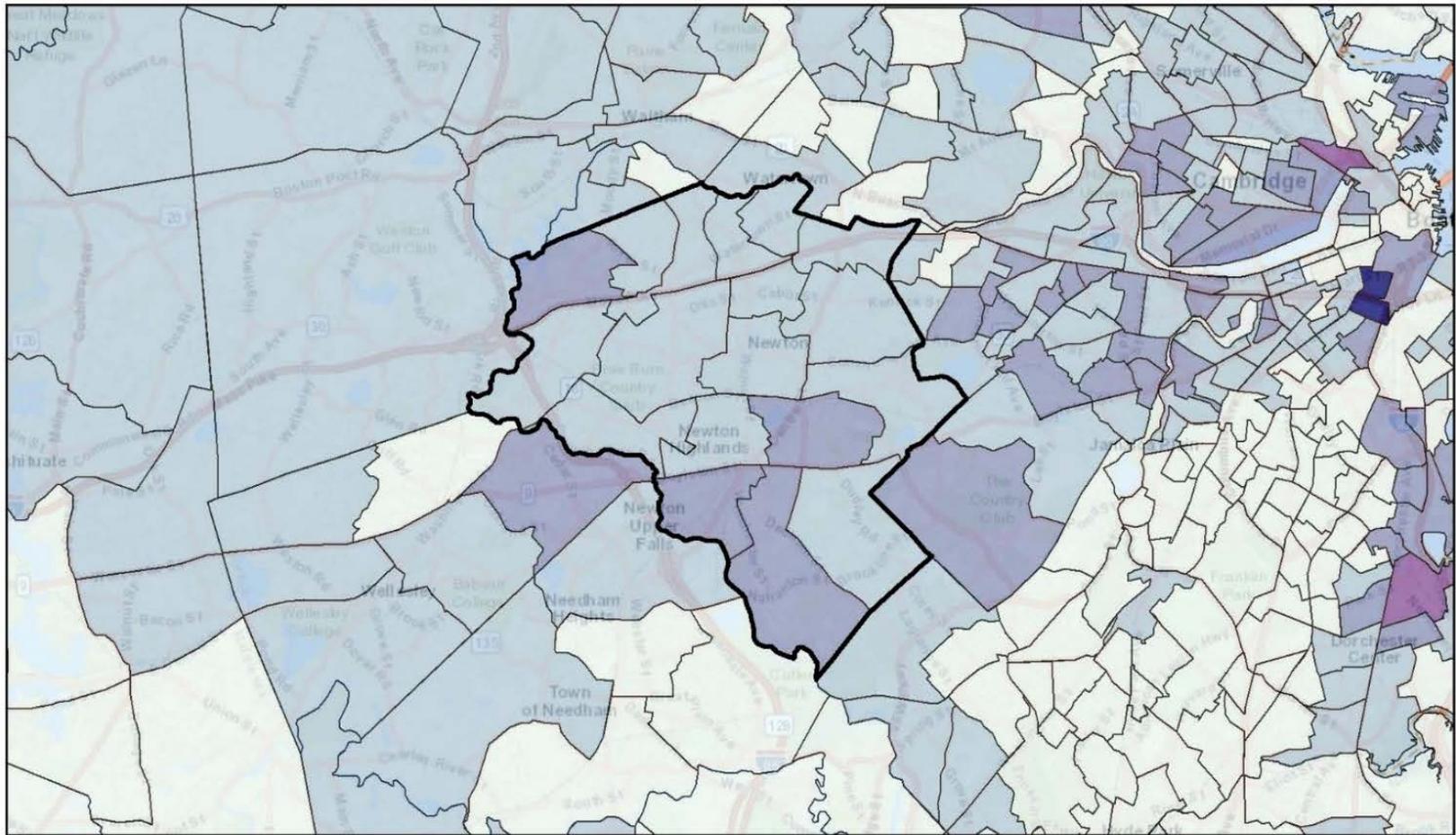
3. Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

In the City of Newton, based on the data provided by the Office of Community Planning and Development (CPD), a majority of Asian households reside in the Auburndale, Newton Highlands, and Newton Upper Falls/Oak Hill villages (Census Tracts 3747, 3741, 3740, and 3738). Approximately 18-24% of the households in each of these four census tracts identified are Asian. In addition, the majority of Black / African American households in the City of Newton lives in the Newton Corner, Newton Upper Falls/Oak Hill, Nonantum, and West Newton villages (Census Tracts 3731, 3733, 3745, and 3740). Approximately 5-8% of households in these four census tracts identified are Black / African American.

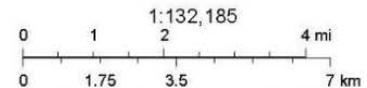
4. If there are concentrations of racial and ethnic groups within your municipality, please describe them and any housing problems or needs they are facing.

The City of Newton does not have any racially and ethnically concentrated areas of poverty (where a census tract must have a non-white population of 50% or more, and 40% or more of the population is living at or below the poverty line). Data indicates Newton has one census tract (3741) with a disproportionate percentage of non-white households living in poverty compared to non-Hispanic white counterparts. Of the households living in census tract 3741, 23% are Asian and 11% of those are living at or below the poverty line.

Race/Ethnicity: Asian Alone, Newton, City-wide

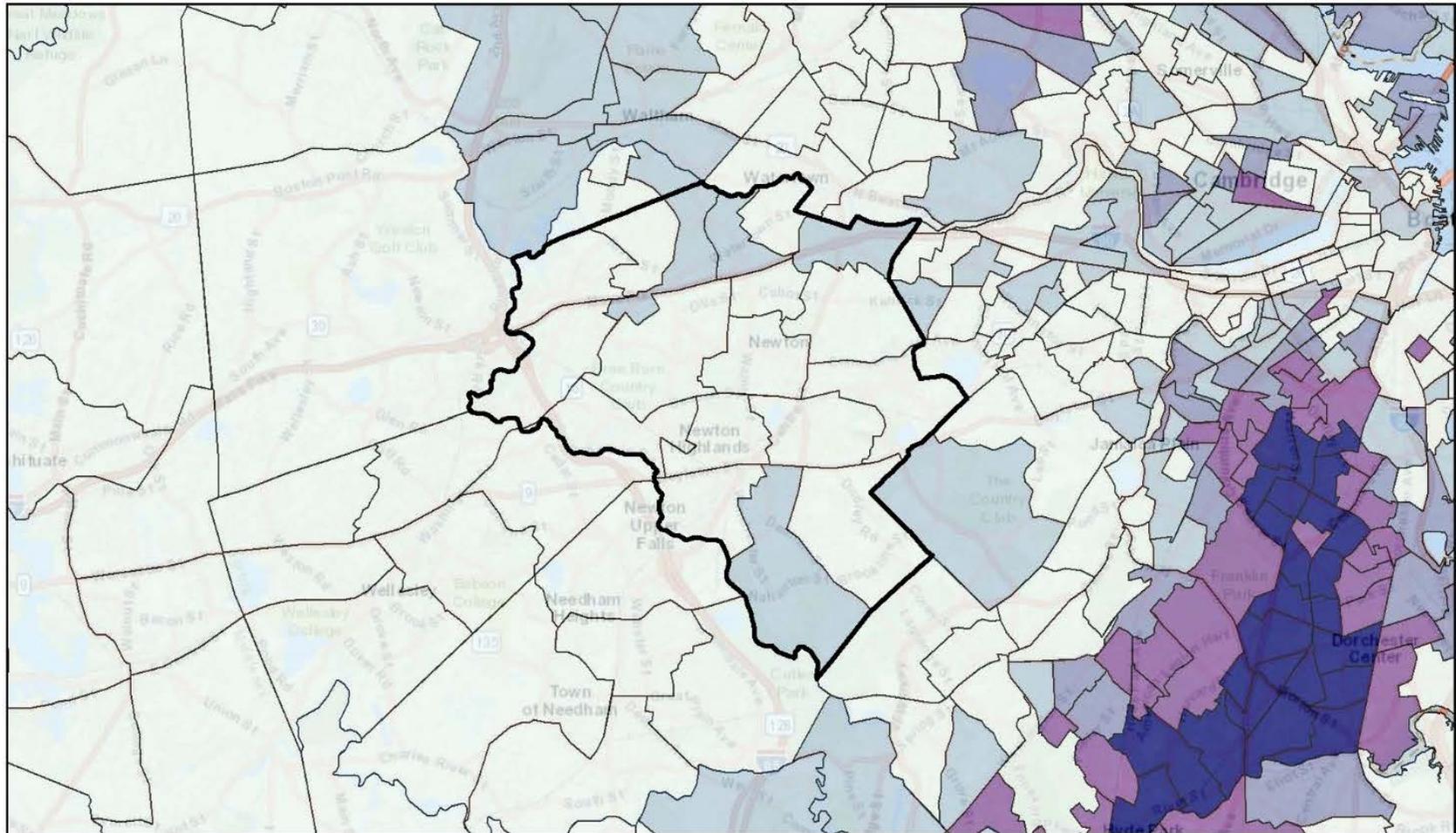


Asian Alone

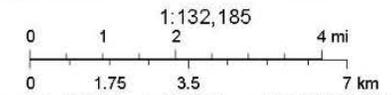
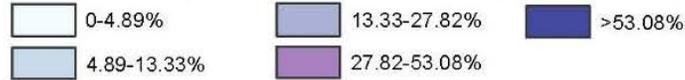


Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

Race/Ethnicity: Black or African American Alone, Newton, City-wide

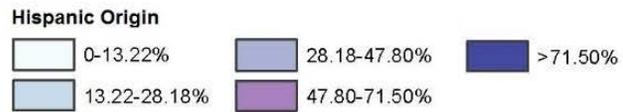
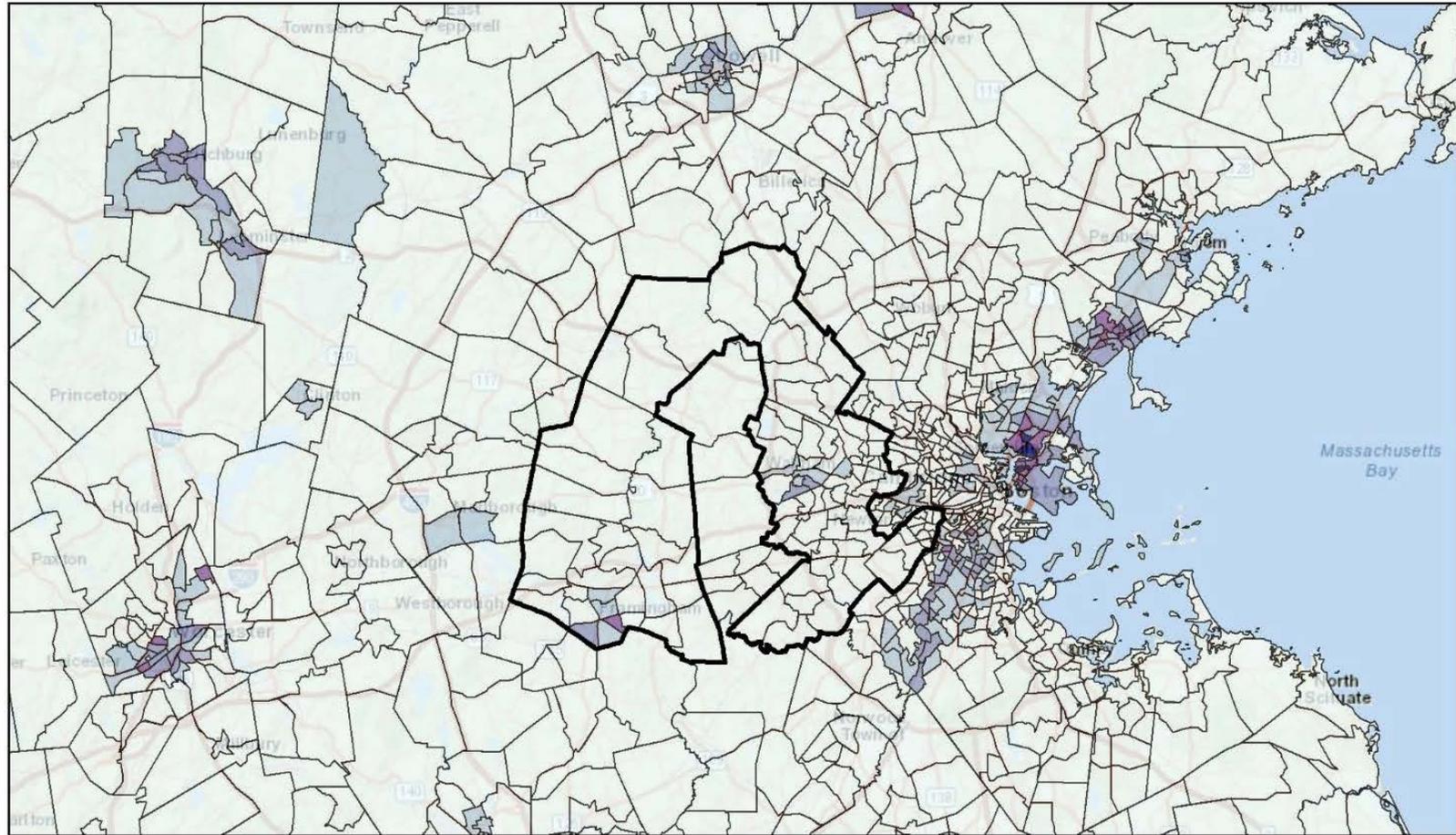


Black or African American Alone



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

Race/Ethnicity: Persons of Hispanic Origin, Consortium-wide



1:524,333
0 4.5 9 18 mi
0 5 10 20 km
Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

As shown in the Brookline's Analysis of Impediments to Fair Housing report (2013), census block groups with higher minority populations tend to be co-located with block groups that have lower household incomes, a greater percentage of rental units and a lower percentage of single-family homes.

The majority of Framingham's racial minorities reside in Census Tracts 3831.01, 3832, 3831.02, 3833, 3834, 3835.01, 3836. All of these Census Tracts are located within South Framingham. These areas comprise most of the low- to moderate- income neighborhoods within Framingham. In addition, data indicates Framingham has one racially and ethnically concentrated area of poverty. In Census Tract 3831.02, 59% of households are persons of Hispanic origin and of which, 29% are living at or below the poverty line.

In Needham, there is a greater population of minority households residing in public housing (19%) compared to the community as a whole (13%).

NA-35 Public Housing – 91.405, 91.205(b)

1. Introduction

Regionally, public housing authorities provide a significant source of affordable housing. There are approximately 5,507 public housing units Consortium-wide, of which 4,420 are accessible to persons with disabilities. Local housing authorities also administer housing vouchers programs, which subsidize rent and utilities in eligible private housing.

Waitlists for housing authority units and voucher programs are long, ranging from three to 12 years, depending on household size and accessibility needs. Local consultations reveal that the number of public housing and voucher applicants has increased over the last five years, due to the lack of affordable housing in the Greater Boston area. Several communities in the Consortium also indicate that voucher holders experience great difficulty obtaining safe housing that is priced low enough to meet HUD payment standards.

Public housing and Section 8 applicants share the same basic need for affordable housing within the Consortium population at large. Lower-income renters, particularly extremely low-income renters (earning <30% of AMI) in the HOME Consortium, are the most likely group to spend more than 30% of their income on housing costs. Once housed, public housing residents cite the need for assistance with workforce readiness, self-sufficiency and money management skills, transportation, and childcare.

While housing authority units in the Consortium are safe and maintained, most state and federal units have fallen short of capital improvements. Modernization efforts needed include new roofs, improved heating systems, energy efficiency, plumbing and electrical system replacements, bathroom and kitchen updates, and brick repointing. HOME funding will support the rehabilitation and preservation of public housing units in the WestMetro HOME Consortium over the next five years.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	23	1,621	3,030	83	2,871	0	18	40

HUD Table 18 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	
# Homeless at admission	0	1	158	27	1	21	0	5	
# of Elderly Program Participants (>62)	0	7	1,043	644	28	613	0	0	
# of Disabled Families	0	7	359	1,218	35	1,138	0	2	
# of Families requesting accessibility features	0	23	1,621	3,030	83	2,871	0	18	
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0	

Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project-based	Tenant-based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
# of DV victims	0	0	0	0	0	0	0	0

HUD Table 19 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	22	1,351	2,434	71	2,299	0	13	37
Black/African American	0	1	136	519	11	496	0	5	3
Asian	0	0	129	56	1	55	0	0	0
American Indian/Alaska Native	0	0	3	13	0	13	0	0	0
Pacific Islander	0	0	2	8	0	8	0	0	0
Other	0	0	0	0	0	0	0	0	0

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

HUD Table 20 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Source:

Ethnicity of Residents

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	181	609	6	590	0	3	9
Not Hispanic	0	23	1,440	2,421	77	2,281	0	15	31

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

HUD Table 21 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

2. Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units.

In the Consortium, there are approximately 4,420 housing authority units suitable for people with disabilities. Most of the persons with physical disabilities who are currently residing in housing authority units or who are applying for tenancy have mobility impairments. First floor units, units in buildings with elevators, grab bars, carpet replacement with solid flooring, and the installation of ramps are the most common modifications requested by applicants and tenants. The City of Waltham notes that case management followed by assistance with living conditions are ongoing needs for housing authority residents that have a disability.

3. What are the number and type of families on the waiting lists for public housing and Section 8 tenant-based rental assistance? What are the most immediate needs of residents of public housing and Housing Choice voucher holders?

Bedford, Concord, Lexington, Sudbury and Wayland report an increase in number of households seeking public housing. In Bedford there are 1,025 family, 228 elderly and 163 handicapped households on waitlists. Thirty-four Bedford families are on the waitlist for project-based vouchers. A total of 143 elderly households are on the Concord Housing Authority's waitlist. In Lexington, there are 1,012 family and 816 elderly households on the waiting list. The Sudbury Housing Authority waitlist includes 1,126 families, 744 individuals and 177 elderly households. In Wayland, 269 households are the waitlist for family housing and 237 households on the waiting list for elderly/accessible units. Bedford, Lexington, Concord and Sudbury Housing Authorities are part of the State of Massachusetts Centralized Waiting List for the Housing Choice program, which includes an estimated wait time of three to five years. This population needs supportive services such as money management, child care and housekeeping (hoarding) to maintain stable housing.

Brookline's public housing waitlist includes 7,724 households. For elders, the average wait time is around 3 years or more, and the average waitlist for families is 6 years or more. The BHA has seen a significant increase in housing demand because of the lack of affordable housing in the Greater Boston region. There are a total of 2,131 applicants on the Section 8 waitlist. It may take between 8 and 10 years to receive assistance from this federal program. Residents of public housing and the Housing Choice program are in need of case management and supportive services. Residents most pressing service needs involve training, employment and workforce readiness for self-sufficiency.

Section 8 Voucher Holders find it very difficult to find housing in the Brookline market that is priced low enough to meet Section 8 payment standards, which are already 120 percent higher than HUD's Fair Market Rent Standards. Most Section 8 Voucher Holders find opportunities in privately-owned affordable rental housing or leave the community altogether for less expensive housing.

There are 1,822 households on the waiting list for Section 8 assistance in Framingham. The public housing waitlist is much higher with 6,421 households. Sixty percent of these applicants are families and 11 percent of all households on the waitlist include a person with a disability. In terms of racial and ethnic composition of families and individuals on the waitlist, 57% are white, 20% are Black or African American, 2% are Asian and 21% identified themselves as other. Approximately 30% of these households are Hispanic.

Due to the lack of affordable housing within Framingham, there has been an increase in the number of applicants that have applied for subsidized housing in the last five years. Currently the waiting time is 10 years. Section 8 voucher holders who are residents or who work in Framingham struggle to find affordable units. Public Housing residents, especially those on the

south end of the city, need transportation services, as well as other self- sufficiency programs that will assist with increasing their household income.

The Natick Housing Authority provided data from the centralized Section 8 waiting list which identifies 157,048 households in need of housing. Though these are state numbers, the NHA indicated the breakdown of household types are similar to what Natick experiences in their applications portfolio. The most immediate need is for families with children and families with disabilities. Both of these groups exceeded 30% of the waiting list. Wait times range from five to 15 years for family units and 6 months to one year for an elderly/disabled unit.

As of September 2019, the Needham Housing Authority (NHA) had 690 applicants on its waitlist for its federal units and 241 for its state-supported units. The average wait time for family units was between three and five years, and six months for the one-bedroom units for the elderly and younger disabled. There has been some decrease in the waitlists over the past five years. There are 418 applicants for Housing Choice Vouchers on the Needham Housing Authority's waitlist with very limited turnover. The Needham Housing Authority's waitlist is comprised of the following breakdown by race: 429 White, 247 Black or African-American, 59 Asian, and over 200 unspecified applicants.

In Newton, the number of families on the public housing wait list and Section 8 waitlist is 3,984 and 469 respectively. The average wait time is eight to nine years. The number of applicants seeking assistance over the last five years has remained the same. Notable immediate needs of residents and voucher holders include transportation services, English language instruction, more multi-lingual services at events, food security resources, and low- or no-cost extra-curricular activities for children. Additionally, Housing Choice Voucher holders are in need of housing search services (i.e. case management services specifically focused on supporting individuals in searching for and identifying units that accept housing choice vouchers in Newton and beyond).

The Waltham Housing Authority has seen a significant increase in the number of applicants over the past five years. There are 4,190 households on the waitlist; 58% of these are families and 38% are elderly households. A total of 1,011 households include a person with a disability. The racial and ethnic composition of all households on the waitlist is as follows: 36% White, 23% Black or African American, 4% Asian, 0.5% American Indian/Alaska Native, 0.2% Pacific Islander, and 36% include other races. Family, elderly and disabled applicants wait an average of 3 years for a unit, while Section 8 applicants wait 7 years. The immediate needs of elderly applicants are case management and transportation. Families need the most assistance with money management and substance abuse counseling.

Waltham's Francis Cabot Lowell Mill is a project-based Section 8 community for older adults and for individuals with disabilities. The Mill is no longer accepting new applicants because their existing waitlist includes 100 applicants with an estimated wait time of 3 years. There are 101 households on the waitlist for the 27 affordable units at The Merc at Moody & Main development. The Watch Factory Lofts and Currents on the Charles, which also have

inclusionary zoning units, currently have over 100 individuals on their waitlist for 37 units.

4. How do these needs compare to the housing needs of the population at large?

Public housing and Section 8 applicants share the same basic need of affordable housing within the Consortium population at large. Lower-income renters, particularly extremely low-income renters (earning <30% of AMI) in the HOME Consortium, are the most likely group to spend more than 30% of their income on housing costs. Income constraints combined with an aging housing stock in the region make it challenging to obtain safe and affordable housing.

Once applicants are housed in affordable units, their immediate focus expands into other quality of life issues. For example, instead of facing overcrowding or being cost burdened, housing authority residents are concerned with fulfilling needs that will help them raise healthy and successful families. These supportive service needs include workforce readiness, self-sufficiency and money management skills, transportation, and childcare.

Subpopulations such as the elderly and persons with disabilities may continue to face similar obstacles as the community-wide population, including accessibility and transportation. Local housing authorities in the Consortium, have a very large population of elderly/disabled households who benefit from supportive services throughout the community. Many of the service partners have a relationship with the public housing authorities to enable residents to participate in local activities throughout the community.

NA-40 Homeless Needs Assessment - 91.405, 91.205 (c)

1. Introduction:

Based on the data collected during the 2019 Point-in-Time Count (PITC), 1,737 individuals were housed through a combination of emergency shelter and transitional housing programs throughout the Balance of State (BoS) Continuum of Care (CoC), of which Newton is a part. In addition, 181 homeless individuals were found unsheltered. Within the Brookline-Newton-Waltham-Watertown (BNWW) region, the 2019 PITC reported 256 individuals housed through a combination of emergency shelter and transitional housing programs. In addition, 45 homeless individuals were found unsheltered within the BNWW region.

To further supplement the PITC, the City of Newton drew data from its five ESG subrecipients. In FY19 (FFY18), the five subrecipients reported serving 1,025 individuals, of which 981 individuals were homeless and 44 individuals were at-risk of homelessness. Of the total number of individuals served, 69% were male and 31% were female. In addition, a vast majority of those served fell in the age group of 45-54 years (23%).

In FY20 (FFY19), the City of Newton's ESG program provided approximately \$150,500 to five nonprofit organizations: Brookline Community Mental Health Center, Community Day Center of Waltham, Middlesex Human Service Agency, REACH Beyond Domestic Violence, and The Second Step, Inc. The ESG funds support the nonprofit organizations' emergency shelter for homeless individuals, transitional housing and supportive services to survivors of domestic violence and their families, and case management and supportive services to prevent individuals and families from becoming homeless and to house homeless individuals and families across the BNWW region. The City of Newton and its ESG subrecipients also actively participate in the BoS CoC's Coordinated Entry process to assess the housing needs of homeless individuals and to meet those needs through the housing placement of available units across the 80+ member communities in the consortium.

In addition, the City of Newton's Health and Human Service Department provides services to further assist homeless individuals and families. Services include the Food for Families program, which provides bags of food for those in need, Narcan Distribution program, and case management and social services to access available financial and housing resources. Services are also available through the City of Newton's Veterans Service Office, including financial assistance for temporary motel stays and rental assistance for first and last's month rent and security deposit.

In FY18 (FFY17), the City of Newton released a Request for Proposals for the development of an underutilized, municipally-owned site located at 160R Stanton Avenue. 2Life Communities, formerly known as Jewish Community Housing for the Elderly, was selected as the developer to expand their existing Golda Meir House at 160 Stanton Avenue and to develop nine to twelve units of permanent supportive housing for chronically homeless adults with disabilities. To

successfully provide permanent supportive housing, 2Life Communities has partnered with Hearth, Inc., a nonprofit organization dedicated to the elimination of homelessness among the elderly through prevention, placement, and housing programs. The project is expected to start construction in winter 2020.

2. If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

The following table reflects data specifically for the BNWW region. The data is extracted from the BoS CoC’s 2019 Point-in-Time Count (PITC) conducted on January 30, 2019. This data is substantially complete, however, categories with “N/A” indicate a lack of available information.

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homeless each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	184	0	294	223	18	262 days (reported through program stay); 417 days (self-reported)
Persons in Households with Only Children	0	0	1	1	1	34 days
Persons in Households with Only Adults	60	46	386	383	7	54 days (reported through program stay); 850 days (self-reported)
Chronically Homeless Individuals	1	N/A	47	N/A	N/A	N/A

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homeless each year	Estimate the # of days persons experience homelessness
Chronically Homeless Families	6 households (20 people)	N/A	12	N/A	N/A	N/A
Veterans	1 household (2 people)	N/A	20	N/A	N/A	N/A
Unaccompanied child	4	2	23	N/A	N/A	N/A
Persons with HIV	0	N/A	3	N/A	N/A	N/A

Source: 2019 Point-in-Time Count for Brookline-Newton-Waltham-Watertown region, Balance of State Continuum of Care

Number of persons becoming and exiting homelessness each year:

According to the 2019 PITC, more individuals in adult-only households (those without children) experience homelessness than those in households with children, 386 individuals compared to 294 individuals, respectively. Unfortunately, the number of persons that exit homelessness in a year is much smaller than that which become homeless. However, a greater number of individuals in households with children exit homelessness in a year than those in adult-only households (18 persons versus 7 persons).

Veterans and unaccompanied youth represent a much smaller population of the overall number of homeless families and adults; however, it is possible that the provided numbers are duplicated, as an individual may be both a veteran and chronically homeless, for example.

Number of days that persons experience homelessness:

The PITC also shows that households with children experience homelessness for a longer period of time than adult-only households (262 days versus 54 days).

3. Nature and Extent of Homelessness:

Race:	Sheltered:	Unsheltered (Optional)
White	98	39
Black or African American	121	7
Asian	13	0
American Indian or Alaska Native	1	0
Pacific Islander	5	0
Multiple	6	0
Ethnicity:	Sheltered:	Unsheltered (Optional)
Hispanic	65	N/A
Not Hispanic	179	N/A

Source: 2019 Point-in-Time Count for Brookline-Newton-Waltham-Watertown region, conducted Balance of State Continuum of Care

Race:	Sheltered:	Unsheltered (Optional)
White	937	103
Black or African American	661	25
Asian	14	0
American Indian or Alaska Native	16	1
Pacific Islander	13	0
Multiple	96	52
Ethnicity:	Sheltered:	Unsheltered (Optional)
Hispanic	734	45
Not Hispanic	1,003	136

Source: 2019 Point-in-Time Count for entire Balance of State Continuum of Care (BoS CoC), conducted by BoS CoC

Waltham’s Community Day Center served 405 homeless individuals in the past year; 59 of the individuals identify as Hispanic. Approximately 89% of those served were White, 8.39% identified as Black or African American, 1% were Asian, and less than one percent were American Indian or Native Hawaiian.

4. Estimate the number and type of families in need of housing assistance for families with children and the families of veterans (if possible to estimate).

Based on the information provided by the PITC for the BNWW region, 294 individuals in families with children experience homelessness each year, and thus would require housing assistance. Approximately 20 veterans experience homelessness each year, though it is not clear from the data provided how many of these veterans are also a part of households with children.

5. Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

Race:	Sheltered:	Unsheltered (Optional)
White	98	39
Black or African American	121	7
Asian	13	0
American Indian or Alaska Native	1	0
Pacific Islander	5	0
Multiple	6	0
Ethnicity:	Sheltered:	Unsheltered (Optional)
Hispanic	65	N/A
Not Hispanic	179	N/A

Source: 2019 Point-in-Time Count for Brookline-Newton-Waltham-Watertown region, conducted Balance of State Continuum of Care

Race:	Sheltered:	Unsheltered (Optional)
White	937	103
Black or African American	661	25
Asian	14	0
American Indian or Alaska Native	16	1
Pacific Islander	13	0
Multiple	96	52
Ethnicity:	Sheltered:	Unsheltered (Optional)
Hispanic	734	45
Not Hispanic	1,003	136

Source: 2019 Point-in-Time Count for entire Balance of State Continuum of Care (BoS CoC), conducted by BoS CoC

6. Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

The following table reflects data for the entire CoC (including BNWW region), from the BoS CoC’s 2019 Point-in-Time Count (PITC) conducted on January 30, 2019. Categories with “N/A” indicate lack of available information.

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homeless each year		Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered					
Persons in Households with Adult(s) and Child(ren)	1,413	0	3,378	2237 (persons with entries into ES or TH during the reporting period) of those, 1891 were homeless for the first time (no entries into ES or TH or PH during the previous 24 months)	232 households	Total individuals for all 3 household types is 840 persons	337 days (reported through program stay); 507 days (self-reported)
Persons in Households with Only Children	5	0			2 households / 2 persons		70 days (reported through program stay); 105 days (self-reported)
Persons in Households with Only Adults	390	181			108 households		98 days (reported through program stay); 337 days (self-reported)

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homeless each year	Estimate the # of days persons experience homelessness
Chronically Homeless Individuals	31	18	110	N/A	N/A	N/A
Chronically Homeless Families	163	0	77	N/A	N/A	N/A
Veterans	46	0	262	131 households	57 households	92 days (reported through program stay); 367 days (self-reported)
Unaccompanied child	24	13	58	48 households	7 households	74 days (reported through program stay); 198 days (self-reported)
Persons with HIV	4	2	N/A	N/A	N/A	N/A

Source: 2019 Point-in-Time Count for entire Balance of State Continuum of Care (BoS CoC), conducted by the BoS CoC.

Based on the data collected during the 2019 PITC, 1,737 individuals were housed through a combination of emergency shelter and transitional housing programs throughout the BoS CoC. In addition, 181 homeless individuals were found unsheltered. Within the BNWW region, the 2019 PITC reported 256 individuals housed through a combination of emergency shelter and transitional housing programs. In addition, 45 homeless individuals were found unsheltered within the BNWW region. On January 30, 2019, when the latest Point-in-Time Count (PIT) was completed, there were 592 homeless individuals in Framingham.

To further supplement the PITC, the City of Newton drew data from its five ESG subrecipients. In FY19 (FFY18), the five subrecipients reported serving 1,025 individuals, of which 981 individuals were homeless and 44 individuals were at-risk of homelessness. Of the total number of individuals served, 69% were male and 31% were female. In addition, a vast majority of those served fell in the age group of 45-54 years (23%).

FY19 ESG Program

Age	Individuals Served
Under 5	30
Age 5-12	34
Age 13-17	15
Age 18-24	40
Age 25-34	158
Age 35-44	181
Age 45-54	234
Age 55-61	179
Age 62+	98
Client Refused/Doesn't Know	56
Total	1,025

Source: 2018 Sage Report

In consultation with the subrecipients, the top reasons cited for homelessness included lack of affordable housing in the region, domestic violence, economic and financial loss, alcohol and substance abuse, and mental health.

The Community Day Center of Waltham recorded 12 homeless veteran individuals in 2019. The City of Waltham Veterans Services Department has increased coordination with the City's Housing Department and the Community Day Center to immediately assess veterans' needs to expedite access to all applicable veterans benefits. Data gathered from the McKinney-Vento liaison and the Waltham Public Schools indicates that a total of 160 homeless children (104 families) were part of the student population during the 2018-2019 school year. The majority of these families did not have permanent housing but were receiving state funding to stay in Waltham hotels.

The City of Waltham funds a wintertime warming center that supports between 17 and 30 individuals a night. There were 46 individuals identified at the last PIT count. Each month the Waltham Area Homeless Coalition convenes to discuss and offer services to the homeless individuals that the police homeless unit encounters. A majority of these individuals experience physical health problems, mental illness, and substance abuse. The City of Waltham has a full-time clinician who meets with those that are referred by the coalition members. Those in need are triaged by the staff of the Community Day Center, police, the City of Waltham substance abuse counselor and Newton Wellesley Hospital staff.

NA-45 Non-Homeless Special Needs Assessment - 91.405, 91.205 (b,d)

1. Introduction

As defined by the Department of Housing and Urban Development, the population of non-homeless persons with special needs includes elderly, frail elderly, persons with mental, physical, developmental disabilities, persons with alcohol or other drug addiction, persons with HIV/AIDS and their families, and public housing residents. The needs of public housing residents have been identified in Sections NA-35 and MA-25, therefore NA-45 focuses on the remaining populations of non-homeless special needs persons.

2. Describe the characteristics of any special needs populations in your community.

The Department of Housing and Urban Development assumes that individuals with special needs are likely to fall under the low- to moderate-income levels. Therefore, programs that are designed to serve individuals and families with special needs are eligible for CDBG funding from the City of Newton. HOME projects and programs may also be designed to reach non-homeless special needs populations through set-aside units and/or targeted outreach.

Elderly and Persons with Disabilities

The population of older adults in Massachusetts is growing faster than any other age group, due to longer mortality rates and lower birth rates. Individuals aged 65 and over accounted for 14.6 percent of the Consortium's population in 2010. It's likely this population has mirrored the statewide upward trajectory, which saw an increase of 125,000 between 2015 and 2018, in the number of individuals age 65 and older. The Donahue Institute's population projections estimate that this growth will continue in the Commonwealth at the same rate through 2025.

Elderly individuals in the HOME Consortium experience the challenges of living alone, dealing with chronic conditions and economic insecurity. The *Massachusetts State Plan on Aging, 2018-2021* reports that the state's older population (65+) has the second lowest levels of economic security in the nation. This means that many Massachusetts elderly cannot cover basic and necessary living expenses while aging in their homes without additional financial assistance. According to the American Community Survey's 2017 five-year estimate, there are 8,110 elderly individuals living below the poverty level in the Consortium, which accounts for 24 percent of the total population living in poverty. In Bedford, Needham, and Wayland, about half the population living below the poverty level is considered elderly.

There are 45,943 (9.2%) individuals with a disability in the Consortium, according to the ACS 2017 five-year estimates. A total of 48% (22,210) of these individuals are adults 65 years and older. The types of disabilities vary and include hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty. Approximately 54% of the Consortium's population with a disability between the ages of 18 and

64 years is either unemployed or not in the labor force. Persons with a disability comprise 86% (36,281) of individuals living below the poverty line in the HOME Consortium.

Over the past decade, Brookline has experienced a 9% increase in the number of persons aged 55 to 64 years old and a 23% increase in the number of persons aged 65 to 74. Persons aged 65 and older make up 15.6% of Brookline's population and 23% of all households have at least one person aged 65 or older. Slightly over 7% of all Brookline residents are disabled and 47% of adults 75 years and older report having a disability. Of this population, 27.6% individuals indicate having difficulty living independently and 32.1% report an ambulatory disability.

Many of the non-homeless special needs residents in Framingham have fixed incomes and mobility issues that prevent them from obtaining needed services. Consultation and outreach by the City identified incidences of seniors living in the community that are socially isolated and consequently lacking vital services. According to the 2017 ACS data, 7,674 Framingham residents have at least one documented disability. Framingham's population also speaks a diversity of languages; Spanish and Portuguese are the two most common non-English languages spoken by residents. About half of individuals that speak Spanish and Portuguese can speak English less than "very well", according to the ACS. These linguistic challenges present an additional barrier for a portion of the non-homeless special needs population.

In Needham the percentage of the population 65 years or older (18%) has remained relatively the same since 2000. However, the number of frail elderly age 85 or older in Needham has increased from 680 or 2.5% in 1990 to 1,107 or 3.2% by 2017. This increase likely suggests an expansion of special needs within this age category that is expected to grow with the aging of the Baby Boomers.

A total of 2,141 (7.2%) of Needham's population identified themselves as having a disability. Of these individuals, 9% were under the age of 18, 39% were between the ages of 18 and 64, and 57% were 65 years or older. Approximately half of the Needham Housing Authority's tenant households claimed some type of disability. These levels of disability are less than statewide figures, but still represent significant special needs within the community and suggest that the town needs to make a concerted effort to produce special needs housing units that are handicapped accessible and/or have access to supportive services.

According to the 2012-2016 American Census Survey (ACS) 5-year estimates, the number of Newton residents living with a disability spans across all possible age groups. Disability types include hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty. Individuals with a disability can require varying levels of care and will need access to a wide range of services provided by the City of Newton, the surrounding communities, and the nonprofit organizations located in these communities.

Persons with Disabilities by Age in the City of Newton

Age Groups	Total	With a disability	% of Age Category
Total Population	87,760	6,979	8.0%
Under 5 years	4,511	5	0.1%
Ages 5 to 17 years	15,316	586	3.8%
Ages 18 to 34 years	18,868	676	3.6%
Ages 35 to 64 years	34,773	1,806	5.2%
Ages 65 to 74 years	8,134	1,157	14.2%
Ages 75 years and over	6,158	2,749	44.6%

Data Source: 2012-2016 ACS 5-Year Estimate

The largest age group with a disability is Newton residents aged 65 years and older. Approximately 8% of Newton’s population has a disability, of which 56% are elderly. According to the City’s assessment, *Living and Aging in Newton: Now and In the Future*, the elderly population, defined in this report as ages 60+, will continue to grow substantially with an estimate of 24,163 elder residents living in Newton by 2030. As a result, services, programs, and housing options must be made available and accessible to the elderly population to encourage aging in the community and to prevent homelessness.

Other Special Needs Populations

Data concerning survivors of domestic violence and persons with alcohol or drug addiction is not available Consortium-wide. However, information is accessible from those organizations located in Newton and surrounding communities that provide shelter and supportive services to these individuals. In Fiscal Year 2019, five nonprofit subrecipients organizations served 1,025 individuals. Of those individuals served by programs for homeless prevention, rapid re-housing, and emergency shelters, the breakdown of subpopulations is as follows:

FY19 ESG Activities – Special Needs Population

Subpopulation	Total Individuals Served – Homelessness Prevention	Total Individuals Served – Rapid Re-housing	Total Individuals Served in Emergency Shelter	Total of Subpopulation
Chronically Homeless	0	4	458	462
Domestic Violence	11	20	173	204
Elderly	2	4	138	144
HIV/AIDS	0	0	2	2
Veterans	0	0	45	45
Individuals with Disabilities:				
Mentally Ill	10	3	398	411
Substance Abuse	0	1	348	349
Other Disability	19	127	104	349
Total Individuals Served by ESG in FY19: 1,025				

Source: FY19 City of Newton and WestMetro HOME Consortium Consolidated Annual Performance and Evaluation Report

While 1,025 individuals were served, it is important to note that an individual may fit in more than one subpopulation. The table above includes the duplication of individuals who have indicated having more than one special need.

The Brookline Housing Authority’s waitlist includes 549 reported cases of households fleeing domestic violence and abuse.

Newton Wellesley Hospital provides data to the Waltham Health Department on residents treated through emergency services for alcohol related disorders. Waltham has the second highest concentration of residents seen with alcohol related disorders in the contingent communities served by Newton Wellesley Hospital. There have been 54 drug overdoses in Waltham since January 2019, six of which resulted in death.

There is limited information on populations with HIV/AIDS in the Consortium, and none of the HOME communities are HOPWA grantees. According to the 2018 Regional HIV/AIDS Epidemiological Profiles generated by the Massachusetts Department of Public Health, there are 5,187 reported cases of persons living with HIV infection or AIDS in Middlesex and Norfolk Counties.

3. What are the housing and supportive service needs of these populations and how are these needs determined?

The *2018 Massachusetts Healthy Aging Data Report* indicates safe and accessible housing and transportation are two of the most common attributes of age friendly communities, like Brookline. However, a growing senior population, coupled with rising housing costs, raises concerns about the ability of seniors to find affordable housing within Brookline. A total of 745 elderly renter households in the town pay more than 50% of their incomes toward housing costs. Waitlists for affordable senior housing are long, especially for those who do not have a Brookline local preference or another priority status. For senior public housing, Brookline seniors will need to wait approximately 18-36 months and those who do not have a preference status will wait between 8-10 years to access senior public housing in Brookline. Similarly, wait times for Hebrew Senior Life housing are approximately five years for affordable units. All of these wait times are lengthened as people age in place, spend down any assets, and move into affordable units.

Many social service providers such as the Callahan Senior Center, South Middlesex Opportunity Council, Advocates, and Wayside Family and Youth have a presence in Framingham. Staff from these organizations noted that clients need financial assistance to make accessible modifications to their homes as well as obtain accessible rental units. A large portion of the lower income population has limited English proficiency and needs English as a Second Language classes. Social service agencies also cite the lack of affordable and accessory dwelling units as a barrier to the non-homeless special needs population's ability to stay within the community.

Needham estimates that there is an unmet town-wide housing need of 1,309 units for persons with disabilities, including units that are handicapped accessible and/or provide supportive services. Additionally, there is a need for 755 affordable units for seniors 62 years of age or older who are earning at or below 80% of median income. These needs were calculated based on the difference between census estimates of the numbers of persons with disabilities and the number of units with handicapped accessibility and/or supportive services in the community, as well as the difference between the number of cost burdened seniors and the number of available affordable units for this population.

The needs for housing and supportive services in Newton were determined in part by the series of community needs assessment meetings held by the Housing and Community Development Division, as well as further consultation with human services and ESG subrecipients and interdepartmental partners at the City of Newton. The following list includes the wide range of needs identified and is not listed in ranking order:

- Additional emergency shelters for individuals and families in Newton
- Additional financial assistance (specifically for security deposit and first and last's month rent)
- Access to affordable childcare

- Assistance navigating the housing process (i.e. one-stop shop)
- Financial literacy
- Home care for the elderly
- Job training
- Landlord education
- Legal services
- Mental health services
- More permanent supportive housing (a model that combines low-barrier affordable housing, health care, and supportive services to help individuals and families lead to more stable lives)
- Services to learn basic needs and life skills
- Safe and affordable housing for a spectrum of physical and developmental disabilities, income levels (specifically for households at and below 30% AMI and those at and below 50% AMI), and family household sizes (i.e. 3-bedrooms)
- Translation and interpretation services and devices
- Transportation to supportive services and programs

Individuals with mental illness and physical disabilities living in Waltham benefit from housing that enables independence while providing adequate support for their needs. Several options are available to assist these populations, including living with family or friends and group housing that provides 24-hour support staff. Individuals experiencing mental illness are often low income due to the long-term costs associated with the condition, and the majority of these individuals receive their income from Social Security. The housing needs for this population are similar to other low-income individuals; however, because of their limited income, many of these individuals may currently live in either unsafe or substandard housing. The Waltham Committee, Inc. and Opportunities for Inclusion are two local service agencies in Waltham that provide resources and support for individuals in need of case management, support services, and outpatient treatment services to monitor and treat their mental illness.

Elderly Waltham residents face issues with transportation, housing, home care, insurance, and meals. Low-income elderly individuals also experience housing problems that include the inability to afford rent and difficulty maintaining a home on a fixed income. A number of services are available through the Waltham Council on Aging, including assisted rides, home care services, insurance counseling assistance, legal services, and Meals on Wheels. The Waltham Housing Department administers a homeowner rehabilitation program that offers interest free, deferred loans to low- and moderate-income homeowners, including elderly households that are aging in place.

The Waltham Health Department substance abuse counselor assists residents that struggle with addiction, by meeting families and individuals through social service agency referrals and street outreach. This staff person connects these families and individuals with counseling, housing opportunities, and health care. The City also partners with the Charles River Community Health

to provide comprehensive coordinated care. Waltham's Health Department hosts monthly public forums to share current needs and resources concerning persons with addictions.

Victims of domestic violence need help with safety planning, finding a job or housing, and accessing benefits. As an ESG subrecipient, REACH's emergency shelter program provides crisis intervention and support services for victims of domestic violence who are not safe in their own home. The shelter offers a range of services designed to provide immediate safety, meet the needs of victims, and help them gain independence. REACH's services include assistance with finding longer-term housing, support with legal issues, and access to other resources beyond those of a typical shelter program to help families heal physically and emotionally.

The Watertown Council on Aging/Senior Center provides a variety of programs and activities to support the social, health, recreational, and emotional needs of older adults. Watertown also employs a social service resource specialist from Wayside Youth & Family Support Network, whose focus is on persons age 18 to 60. This specialist assists with preventing homelessness. The Support Network also has a variety of programs for children, young adults and families.

4. Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area.

The City of Newton is not a grantee of the Housing Opportunities for Persons with AIDS (HOPWA) program. Very little data is available for persons with HIV/AIDS and their families in the BNWW region. However, the City and its surrounding communities continue to provide CDBG and ESG-funded supportive services that are accessible and potentially beneficial to these individuals.

Persons living with HIV/AIDS (PLWHA) share housing and supportive service needs in common with the above mentioned non-homeless special needs populations. Research shows that engagement and retention in care are linked with high rates of viral suppression among PLWHA. The *Massachusetts Integrated HIV/AIDS Prevention and Care Plan: 2017-2021* reports that 86% of PLWHA who are engaged in care and 89% of PLWHA who are retained in care in Massachusetts were virally suppressed. Access to stable, affordable housing and basic services that help individuals maintain medical care and treatment are essential for PLWHA.

NA-50 Non-Housing Community Development Needs - 91.415, 91.215 (f)

1. Describe the jurisdiction's need for Public Facilities:

The City of Newton continues to rehab, retrofit, and construct public facilities to meet the needs of the elderly and persons with disabilities. However, as outlined in the City's 2017 Transition Plan, there are public facility needs that are not met. The list of unmet needs includes accessible elevators in school buildings, automatic door openers, accessible toilet rooms, and ramps at neighborhood libraries, community centers, and field houses, proper signage on the interior and exterior of all public buildings, and improved signage for accessible parking spaces.

2. How were these needs determined?

The Housing and Community Development Division held a series of community needs assessment meetings at varying locations and times to solicit the public's feedback regarding the city's housing, human services, homelessness, accessibility, and quality of life concerns. In addition, the Division held interdepartmental consultation meetings with the Departments of Public Buildings, Public Works, Health and Human Services, and Senior Services.

3. Describe the jurisdiction's need for Public Improvements:

Public improvement needs identified focused on pedestrian safety and mobility for persons with disabilities and the elderly throughout the City of Newton. The needs include accessible pathways to park amenities and building entrances, sidewalk improvements, curb cuts, and mid-block signals to improve safety at crosswalks.

4. How were these needs determined?

As stated previously, the Housing and Community Development Division held a series of community needs assessment meetings at varying locations and times to solicit the public's feedback regarding the city's housing, human services, homelessness, accessibility, and quality of life concerns. In addition, the Division held interdepartmental consultation meetings with the Departments of Public Buildings, Public Works, Health and Human Services, and Senior Services.

5. Describe the jurisdiction's need for Public Services:

Of the public service needs identified, many coincided with housing such as landlord education and supportive services to maintain successful tenancy. Supportive services include assistance with basic needs and life skills, financial literacy, and mental health services. Other public service needs identified include financial assistance for security deposits and first and last month's rent, access to affordable childcare, legal services, home care for the elderly, and job training.

Another public service need that often came up throughout the needs assessment sessions was the need for better transportation options for low- to moderate-income individuals and families

to allow access to services and programs, as well as the need for translation and interpretation services for non-English speaking individuals and families.

6. How were these needs determined?

The Housing and Community Development Division held a series of community needs assessment meetings at varying locations and times to solicit the public's feedback regarding housing, human services, homelessness, accessibility, and quality of life. In addition, the Division held interdepartmental consultation meetings with the Department of Health and Human Services and Senior Services. The Division also engaged with resident advisory committees, including the Commission on Disability and Fair Housing Committee, to help inform the most pressing needs of the community. Lastly, the Division consulted with over twenty nonprofit organizations serving the low- to moderate-income populations living in and around Newton to better understand their needs.

MARKET ANALYSIS

Housing Market Analysis

MA-05 Overview

1. Housing Market Analysis Overview:

Half of the residential property in the Consortium are single-family detached structures, as shown in the *Residential Properties by Unit Number* Table. Approximately 64% of the Consortium's 190,889 residential units are owner-occupied and 79% of these owner-occupied homes have three or more bedrooms. Alternatively, the distribution of renters housed in one (33%) and two-bedroom (39%) units is more evenly distributed, with 22% of renters living in homes with three or more bedrooms.

The region is in need of additional affordable rental housing. A few factors affect the number of existing rental units in the WestMetro Consortium. Several communities in the Consortium continue to experience the effects of an influx of condo conversions that removed multi-family units from rental housing stock. Housing staff note that Boston's escalating real estate prices bring more households to the rental market in communities such as Watertown and Waltham, which places additional demand on the local supply. Finally, the towns of Bedford, Concord, and Sudbury have a very limited supply of rental housing.

In terms of specific affordable housing needs, rental units for elderly and persons with disabilities are cited as a need throughout the Consortium. People with a disability face greater challenges than the general population in finding appropriate housing and the Consortium lacks an adequate supply of accessible, affordable housing. The elderly population, many of which also have a disability, are the most cost burdened household type consortium-wide. Regionally, there is an unmet need for housing that places older adults and persons with a disability in proximity to transportation, social and health services, and opportunities for community involvement.

In Newton, affordable family-sized units, units for seniors with support services, and mixed-income multifamily developments are all housing types that are in urgent need. There is a desire by many low-to-moderate income households for housing near or within village centers, providing easy access to transit, employment, and amenities.

MA-10 Housing Market Analysis: Number of Housing Units - 91.410, 91.210(a)&(b)(2)

1. Introduction

Half of the residential property in the Consortium are single-family detached structures, as shown in the *Residential Properties by Unit Number* Table. Approximately 64% of the Consortium’s 190,889 residential units are owner-occupied and 79% of these owner-occupied homes have three or more bedrooms. Alternatively, the distribution of renters housed in one (33%) and two-bedroom (39%) units is more evenly distributed, with 22% of renters living in homes with three or more bedrooms.

The region is in need of additional affordable rental housing. A few factors affect the number of existing rental units in the WestMetro Consortium. Several communities in the Consortium continue to experience the effects of an influx of condo conversions that removed multi-family units from rental housing stock. Housing staff note that Boston’s escalating real estate prices bring more households to the rental market in communities such as Watertown and Waltham, which places additional demand on the local supply. Finally, the towns of Bedford, Concord, and Sudbury have a very limited supply of rental housing.

In terms of specific affordable housing needs, rental units for elderly and persons with disabilities are cited as a need throughout the Consortium. Rental units appropriately sized for families are needed in Framingham, Newton, and Waltham. Each locality also identified specific household income types that would benefit from a set-aside of units. For example, Needham aims to create units affordable for households below 50% Area Median Income (AMI), Natick will target the population between 50-80% AMI, and there is a gap in housing for individuals and families earning below 30% AMI in Waltham.

The preservation of affordable housing will be a focus during the next five years. There are approximately 16,558 housing units in the WestMetro HOME Consortium on the Subsidized Housing Inventory. Consortium communities are keyed into units with affordability periods that have the potential to expire and will work closely with owners to preserve their affordability.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	99,855	50%
1-unit, attached structure	12,115	6%
2-4 units	39,855	20%
5-19 units	21,135	11%
20 or more units	27,790	14%
Mobile Home, boat, RV, van, etc	233	0%
Total	200,983	100%

HUD Table 22 – Residential Properties by Unit Number

Data Source: 2011-2015 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	280	0%	3,545	5%

	Owners		Renters	
	Number	%	Number	%
1 bedroom	4,795	4%	23,035	33%
2 bedrooms	20,355	17%	27,125	39%
3 or more bedrooms	96,594	79%	15,160	22%
Total	122,024	100%	68,865	99%

HUD Table 23 – Unit Size by Tenure

Data Source: 2011-2015 ACS

2. Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

There are approximately 16,558 housing units in the Consortium on the Subsidized Housing Inventory. According to the most recently published Subsidized Housing Inventory (SHI) by DHCD in January 2019, Newton has 2,416 units on its SHI, of which, 1,461 units (approximately 60% of the units on the SHI) are deed-restricted affordable at or below 80% AMI.

The breakdown of the Consortium’s units is included in the table below.

WestMetro HOME Consortium – Units on the Subsidized Housing Inventory

	Bedford	Belmont	Brookline	Concord	Framingham	Lexington	Natick	Needham	Newton	Sudbury	Waltham	Watertown	Wayland
Total	564	365	2,262	405	2,862	673	1,458	1,339	2,416	445	1,834	1,702	233
Tenure													
Owner	48		81	74	172	30	124	17	16	37	11		52
Rental	516		2,181	331	2,690	643	1,334	1,382	2,400	408	1,823		181
Households type													
Elderly	221		1,149	107	469	245	546	273		223	815		101
Disabled	69			67		84	87	146		4	243		11
Special			186										
Family	274		927	231	2,393	314	825	980		218	765		121
Income Eligibility													
>30% AMI			444		457		457						
30-50% AMI			275	136	236	321	236			93	1,467		137
50-80% AMI			1,264	269	372	352	372			352	356	1,702	96

3. Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

Three Brookline developments currently listed on the Subsidized Housing Inventory (SHI) are subject to use restrictions that will eventually expire, potentially removing them from the SHI. These include the Village at Brookline (307 units) and Beacon Park (80 units) both of which may expire from the SHI in 2046 and 2036, respectively. In addition, Hebrew Senior Life owns three large properties (containing a total of 516 units), with use restrictions that will expire in 2044. It seems likely that this mission-driven owner will work with the Town to extend affordability beyond that date. Town staff has worked diligently to extend use restrictions on expiring use properties developed with federal subsidies in the 1970s.

According to the SHI, the City of Framingham had a net loss of 131 affordable units. Community Economic Development Assistance Corporation's (CEDAC) Expiring Use database indicates a potential expiration of 373 units. However within the next 5 years only the 5 units that are part of the Highland Street development are expected to be lost from the SHI. There will be approximately 100 new units added to the inventory during this period.

Although CEDAC's Expiring Use Inventory lists 32 Lexington units at risk of expiring from affordability, these units are expected to remain affordable during the next five years. The six units of housing that are part of the Interfaith Housing Development are owned by LexHAB, a nonprofit, quasi-municipal organization. These housing units will remain affordable in perpetuity. The 26 units included in Katahdin Woods are recertified annually. The town anticipates this renewal will continue without issue.

In the next five years, six units in Needham are expected to be eliminated from the SHI as part of the Chestnut Hollow development. The other expiring use projects do not have expiration dates until 2037 and beyond, however, these projects all involve special needs units sponsored by nonprofit entities with missions that would prompt them to find ways to extend affordability.

According to Newton's most current SHI, six properties have expiring uses between 2020 and 2026. These six properties include 473 SHI units, of which 299 units are deed-restricted and affordable at or below 80% AMI. The affordability periods for 250 of these SHI units have already been extended past 2036, as these properties are owned and managed by nonprofit affordable housing developers. For the remaining 223 units, the City is actively in conversation with the property owners to identify strategies for extending the affordability restrictions related to these properties.

No units are expected to be lost from the SHI in Watertown, despite those shown on CEDAC's Expiring Use Inventory, which includes 46 assisted living units at Brigham House and 25 units in the St. Joseph's development. Both Brigham House and the Coolidge School are covered by a regulatory agreement and a local permit that runs with the land. The agreements and local permits require that these facilities maintain affordable units as long as the project is in place.

Saint Joseph Hall is a Community Housing Development Organization sponsored HOME-assisted property.

There are no units in Belmont, Bedford, Concord, Sudbury, Waltham, and Wayland that are expected to be lost from the SHI.

4. Does the availability of housing units meet the needs of the population?

The need for more affordable housing production in the Consortium, as with the Greater Boston region, is severe and growing. High real estate prices make it difficult for low-and moderate-income households to enter or stay in the community, and current market rents put many lower income households in a state of housing cost burden. There are over 5,507 PHA units in the Consortium, yet housing authorities maintain long waitlists, which include wait times ranging from three to 12 years. Other affordable rental units, such as those created through inclusionary zoning and a variety of funding mechanisms, also have significant wait lists.

People with a disability face greater challenges than the general population in finding appropriate housing and the Consortium lacks an adequate supply of accessible, affordable housing. The elderly population, many of which also have a disability, are the most cost burdened household type consortium-wide. Regionally, there is an unmet need for housing that places older adults and persons with a disability in proximity to transportation, social and health services, and opportunities for community involvement.

Additional housing programs, including transitional and permanent supportive housing, are needed to address homelessness in the Consortium. Although Tenant Based Rental Assistance programs in Waltham and Framingham target homeless and near-homeless households, these resources are not enough to respond to the regional need. Transitioning these homeless individuals and families to stable housing requires a multi-faced approach which addresses their extremely low-income status alongside other issues, like mental health and/or physical disabilities that effect access to housing.

Brookline's affordable housing stock, as recognized under the Commonwealth's Chapter 40B Subsidized Housing Inventory (SHI) is 2,587 units, or 9.87% of the Town's 26,201 unit total housing stock. Of this SHI total, slightly under 1,000 units consist of low-income rental units owned by the Brookline Housing Authority (BHA), with most having been built in 1960s and 1970s. The balance consists of a number of permanently affordable units that are owned by nonprofits, several affordable housing developments partially financed by the Town's Housing Trust, and approximately 100 scattered rental and owner-occupied units produced under the Town's Inclusionary Zoning requirements. Local initiatives from 2005 to 2015 were able to increase Brookline's affordable housing inventory from approximately 8 percent to nearly 9 percent. The recent permitting of nine Chapter 40B projects the Town has further increased its SHI inventory to nearly 10 percent. Accounting for projects in various stages of permitting and

development, the Town’s SHI count may surpass the 10% benchmark during the next calendar year.

In Framingham, there is a need for accessory dwelling units for seniors who have family in the area and cannot afford to live in the long-term care system. In South Framingham, in particular, there are not enough first floor apartments for households with mobility issues. In general, there are not enough affordable housing units located nearby the major job centers within the region.

According to the Natick Housing Plan which utilized data from the Department of Housing and Urban Development and the 2010 Census and American Community Survey, there are approximately 13,000 2-4 person households in Natick and around 4,000 of these rent their homes. Natick households have increased in number by 2.5% between 2000 and 2010, the largest proportional increase in the Metro West region after Wayland. Of those 13,000 households, 1,350 are within the 50% to 80% AMI income bracket, about a third of those are elderly households with a potential need for elevators or first floor units. Though the Town has exceeded the 10% SHI sought by DHCD, the Town only has 979 actual affordable units (rental and ownership) in total and most of these serve incomes below 50% AMI. Only about 300 affordable units in Natick are available for the 1,350 households at the 50% to 80% AMI income range; this represents a shortfall of 1,050 units.

An analysis of cost burdens by income level, tenure and type of household estimates that at least 1,289 units of housing in Needham are required to meet the needs of existing residents earning at or below 80% of median income, up from 1,142 in 2011. An additional 1,301 ADA-accessible units are needed for people with disabilities. A portion of these units will need to be coupled with supportive services. The unmet need for families earning at or below 80% Median Family Income in Needham decreased modestly from 364 units in 2011 to 339 based on the more recent 2015 CHAS data. The unmet housing need increased for seniors, however, increased from 609 units in 2011 to 755 by 2015.

Estimated Unmet Housing Needs in Needham

Population in Need	Housing Available That is Affordable All Units 2011/2015**	Unmet Need* 2011/2015
Extremely Low Income (< or = 30% MFI)	395 / 364 units	570/565 units
Very Low Income (30% to < or = 50% MFI)	202/145 units	313/299 units
Low to Moderate Income (50% to < or = 80% MFI)	175/295 units	259/425 units
Total	772/804 units	1,142/1,289 units
Population in Need	Housing Available That is Affordable -- All Units**-- Units	Unmet Need -- All Those with Cost Burdens -- Units

	Occupied by Those Earning < = 80% MFI 2011/2015	Occupied by Those Earning < = 80% MFI 2011/2015
Families***	4,435 units -- 85 units/ 5,024 units – 470 units	1,589 units -- 364 units/ 1,319 units – 339 units
Seniors (62 and over)***	2,351 units -- 596 units/ 2,224 units – 549 units	924 units -- 609 units/ 1,050 units – 755 units
People with Disabilities***	840 (8 MassAccess + est. 100 other private units + 89 DDS units + 34 other SHI + 609 beds)	1,301 units with handicapped accessibility and/or supportive services

Sources: U.S. Department of Housing and Urban Development (HUD), SOCDs CHAS Data, 2011 and 2015 (latest report available). MassAccess Housing Registry, and Massachusetts Department of Housing and Community Development.

* Includes all those spending too much on their housing per CHAS data.

** Includes units that are occupied by those who are not paying too much for their housing per CHAS data.

*** Many of those in these population groups are also largely incorporated in the numbers of those with unmet housing needs earning below 80% AMI delineated above.

In Newton there is a dearth of housing for households at or below 50% AMI. Additionally, many households are overcrowded or are severely cost burdened. There is also a need for more mixed-income housing in village centers that is accessible to public transit and other walkable amenities.

5. Describe the need for specific types of housing.

The specific types of housing needed in local Consortium communities are described in the paragraphs below.

New multifamily rental housing is needed in Brookline. Just over half of Brookline’s housing stock is occupied by renters. Forty years ago, rental units made up a much larger share of all housing in Brookline. Over time and partially in response to market pressure, multifamily buildings in Brookline were converted to condominiums and offered as for-sale units. These lost apartments have never been replaced with new rental housing, although 41 percent of all condominiums are currently rented.

More multifamily housing serving the low- and moderate-income population should be built. It is estimated that one in every three people in Brookline earns less than 80% of area median income. Low income renters face significant hardship trying to find an affordable unit in Brookline. Brookline’s very high market rents prohibit low income renters with Section 8 rental assistance from finding an affordable unit. Multifamily housing should be scaled and built around rapid transit stations connecting Brookline to local and regional employment and services.

The inventory of units serving the special needs population does not seem to meet the needs of Brookline residents. Half of the Brookline Housing Authority’s 923-unit public housing inventory

is designated for seniors and people with disabilities, but these units are designed primarily to be accessible for people with mobility impairments. However, there are significant unmet needs for housing units with support services for people with other types of disabilities, such as mental health and cognitive impairments.

There is lack of workforce housing units in Framingham. The City also needs additional three- to four-bedroom rental units for small and large family households.

In Natick, only 1,350 affordable units are available to households earning 50-80%, but there is an additional need of 1,050 units targeting this income group. Approximately one-third of these households are elderly and need housing that is accessible for mobility disabilities.

The needs analysis by Needham's Planning and Community Development Department suggests that there should be a focus on rental unit development based on the following important considerations:

- Target the needs of the community's most vulnerable residents with very limited financial means. There is a particular need for housing to accommodate those earning at or below 50% AMI.
- Provide opportunities for some seniors who may be considered "overhoused" and spending far too much on their housing to relocate to more affordable and less isolated settings, opening up their homes to families requiring more space.
- Utilize state and federal subsidy funds that are largely directed to rental housing development.

The housing analysis also suggests the need for greater numbers of units that are handicapped accessible, include supportive services, and/or incorporate the concept of "visitability" to accommodate a significant number of special needs residents in Needham and an increasingly aging population.

Affordable family-sized units, units for seniors with support services, and mixed-income multifamily developments are all housing types that are in urgent need throughout Newton. There is a desire by many low-to-moderate income households for housing near or within village centers, providing easy access to transit, employment, and amenities. Accessory apartments have been allowed in Newton since April 2017. The latest count of these units in the City, conducted in June 2019, found that 28 accessory apartment building permits have been issued, 13 of which have received a certificate of occupancy.

Additional rental housing for lower-income populations is needed for the overall population in Waltham. The need for accessible units for persons with disabilities and seniors will continue to increase over the next decade. These housing options are best located within close proximity to transit, services and opportunities for community involvement.

Watertown is in need of housing appropriate for families and single persons, including older adults. Although types of housing are available on the market, but many people are priced out of market rents or home purchase prices. Watertown also needs all types of housing at lower income levels (i.e. below 80% AMI).

MA-15 Housing Market Analysis: Cost of Housing - 91.410, 91.210(a)

1. Introduction

There is a shortage of housing in the WestMetro HOME Consortium for lower income families. The majority of households in the MetroWest Consortium cannot afford to purchase a single-family home or condominium in their community. These families and individuals must rent for the long term, placing demand on the region's rental real estate market and in turn driving up rents.

According to a Consortium-wide Zillow search conducted in the Fall of 2019, approximately 21 percent of one-bedroom, 20 percent of two-bedroom, 31 percent of three-bedroom, and eight percent of four-bedroom rental units are considered affordable by Fair Market Rent (FMR) standards. However, most advertised rental units do not include utility costs, unlike FMR calculations. Adding average winter utility costs to advertised rents in the Consortium would decrease the percentage of units well below the FMR.

Median sales prices for single family homes rose throughout the Consortium from 2014 to 2018. Newton's median sale price for single family homes increased 25%, from \$945,750 to \$1,150,00, during this 5-year time period. The shortage of developable land and existing housing inventory in the Greater Boston area creates a high-priced real estate market, which is not anticipated to change in the next five-years.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2015	% Change
Median Home Value	0	0	0%
Median Contract Rent	0	0	0%

HUD Table 24 – Cost of Housing

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	9,982	14.5%
\$500-999	9,135	13.3%
\$1,000-1,499	20,813	30.2%
\$1,500-1,999	16,460	23.9%
\$2,000 or more	12,414	18.0%
Total	68,804	100.0%

HUD Table 25 - Rent Paid

Data Source: 2011-2015 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	7,129	No Data
50% HAMFI	12,154	1,077
80% HAMFI	26,253	3,998
100% HAMFI	No Data	8,872
Total	45,536	13,947

HUD Table 26 – Housing Affordability

Data Source: 2011-2015 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	1,253	1,421	1,740	2,182	2,370
High HOME Rent	1,253	1,344	1,614	1,857	2,051
Low HOME Rent	943	1,011	1,213	1,401	1,563

HUD Table 27 – Monthly Rent

Data Source: HUD FMR and HOME Rents

2. Is there sufficient housing for households at all income levels?

There is a shortage of housing in the WestMetro HOME Consortium for lower income families. The Housing Affordability Table above shows the number of rental and owner units that are affordable to households earning 30%, 50%, 80%, and 100% of the HAMFI Consortium-wide. According to the data presented in this table, 29 percent of total homeowner housing units in the Consortium are affordable to households early 80% of the HAMFI and only 8 percent of owner units are affordable to households earning 50% of HAMFI (data for 30% of the HAMFI is unavailable).

Consequently, rental housing supplies the majority of the units that are affordable to lower income households in the Consortium. Just under 87 percent of the housing stock affordable to households earning 80% of the HAMFI is rental housing and 92 percent of the housing units affordable to households earning 50% of HAMFI is rental housing. With this imbalance, there is a pressing need for more affordable rental housing in the Consortium. Only 27% of rental stock is affordable to households earning 50% of HAMFI and 16% is affordable to households earning 30% of HAMFI.

In Brookline, non-families comprise over half of all households. Most are single (63 percent), and 31 percent of them are people 65 years of age and over. Brookline’s rate of family households (48%) is low when compared with surrounding cities and towns. Married couples comprise the majority of families in Brookline (84%), and nearly half (46 percent) of them have dependent children. Therefore, there is not enough housing being produced for low to moderate income families with dependent children, or workforce housing. Housing production

for the elderly is increasing but more efforts should be focused to the population of families with dependent children.

Bedford, Concord, Lexington, Sudbury and Wayland all have a limited portfolio of public housing which serves a lower income population than the restricted units that are typical for 40B type developments. Even as some communities reach the state imposed 10% requirement, there is still a need for a wider range of housing options, in terms of size, affordability, and accessibility. Many of these communities have aging populations that, in some cases, will require more affordable and accessible housing options in order to stay in the community.

In Framingham there is a shortage of 2,615 housing units affordable for families earning less than 30% of the AMI.

In Natick, only 1,350 affordable units are available to households earning 50-80%, but there is an additional need of 1,050 units targeting this income group. Approximately one-third of these households are elderly and need housing that is accessible for mobility disabilities.

There is an insufficient supply of homeowner and rental housing units for those earning at or below 80% of area median income in Needham. The high costs of housing in Needham suggests that even those earning well above this level are priced out of the local housing market. For example, using the 2018 median single-family home price of \$976,250, a household would have to earn approximately \$268,000 (if they were able to access 95% financing and \$226,870 with 80% financing), this is well above the town's median household income of \$141,690 and even the median family income of \$172,774. The 2018 median condo price was \$754,900, which required an estimated income of \$214,000 with 5% down and \$182,400 with the 20% down payment, still well beyond the means of most Needham households.

The costs of renting are also very high with a typical Needham two-bedroom apartment renting for at least \$2,500 in older properties and over \$3,500 in newer multi-family development. A \$2,500 apartment would require an income of approximately \$108,000 based on spending no more than 30% of income on housing costs and an average of \$200 in monthly utility bills. This is more than double the median income of renter households of \$48,683.

Households at income levels at or below 80% AMI struggle to find affordable housing opportunities in Newton. For instance, despite there being 1,915 extremely low-income renters in Newton, there are only 805 units affordable at this income level. Therefore, 58% of renters at or below 30% AMI are unaffordably housed. As a result, many of these households are severely housing cost burdened, or experience overcrowding in an effort to remain in Newton. Homeowners also struggle find affordable housing in Newton. There are 3,645 homeowners at income levels at or below 80% AMI, but only 1,010 ownership units affordable to these households in Newton. With only 27% of low- to moderate-income owners in Newton living in an affordable unit, most owners at or below 80% AMI in Newton experience similar housing problems as renters at these income levels.

According to 2017 ACS 40% of Waltham renter households and 27% of owner-occupied housing units have monthly housing costs totaling 30 percent or more of their household income. Approximately 34% of the 12,228 owner occupied households earn \$75,000 or less, and 12% of these households earn at or below 30% of AMI. There are 11,494 rental housing units with 60% of renter households earning \$75,000 or less per year, and 29% of these households earn at or below 30% of the AMI. While the majority of affordable units recently developed in Waltham assist households at 80% of the AMI, the City needs more affordable rental housing for low and very low- income households. Presently only the state and federally assisted units in the City target households at 50% or below AMI.

3. How is affordability of housing likely to change considering changes to home values and/or rents?

According to the most recent data available from MAPC’s DataCommon, the percentage of renters spending \$2,000 or more on rent and those spending \$1,500 to \$1,999 on rent is increasing in the Consortium as a whole. Renters spending \$2,000 or more increased the most in Brookline, from 44.3 percent in 2015 to 50.3 percent in 2016. The majority of households in the MetroWest Consortium cannot afford to purchase a single-family home or condominium in their community. These families and individuals must rent for the long term, placing demand on the region’s rental real estate market and in turn driving up rents.

Gross Rent of Renter-Occupied Housing Units in the HOME Consortium

Community	≤ \$999		\$1000-\$1499		\$1500-\$1999		≥ \$2,000	
	2015	2016	2015	2016	2015	2016	2015	2016
Bedford	19.0%	12.5%	24.2%	26.6%	24.9%	26.8%	31.9%	34.1%
Belmont	9.9%	11.1%	20.2%	18.7%	50.6%	48.3%	19.4%	22.0%
Brookline	14.1%	13.1%	14.0%	12.9%	27.5%	23.7%	44.3%	50.3%
Concord	15.9%	10.8%	23.9%	25.1%	21.8%	21.7%	38.5%	42.4%
Framingham	35.2%	33.4%	39.3%	36.9%	19.2%	23.5%	6.3%	6.2%
Lexington	25.2%	24.7%	17.8%	14.2%	18.6%	18.7%	38.4%	42.5%
Natick	26.1%	25.4%	43.8%	40.0%	17.4%	22.1%	12.7%	12.4%
Needham	31.0%	29.6%	21.9%	24.0%	19.7%	18.8%	27.4%	27.6%
Newton	15.7%	15.3%	21.7%	19.8%	31.0%	32.0%	31.6%	32.9%
Sudbury	77.5%	60.6%	4.8%	8.8%	4.2%	18.1%	13.5%	12.5%
Waltham	24.6%	22.4%	32.8%	32.2%	25.9%	26.1%	16.7%	19.2%
Watertown	16.5%	14.8%	26.3%	22.7%	38.1%	41.5%	19.0%	21.0%
Wayland	52.3%	40.7%	18.5%	24.2%	11.4%	15.0%	17.7%	20.1%
TOTAL	20.7%	20.8%	25.3%	25.4%	26.9%	27.8%	23.9%	26.0%

Sources: DataCommon based on the 2011-2015 and 2012-2016 American Community Survey

The table below illustrates renters’ purchase power in the HOME Consortium by applying the Median Household Income of a renter to the median sales price in each community. The price gap for a renter seeking to purchase a single-family home ranges from \$259,950 in Framingham to over \$1.3 million in Brookline. This gap shrinks for condominiums, ranging from \$79,400 in Framingham to \$635,454 in Sudbury.

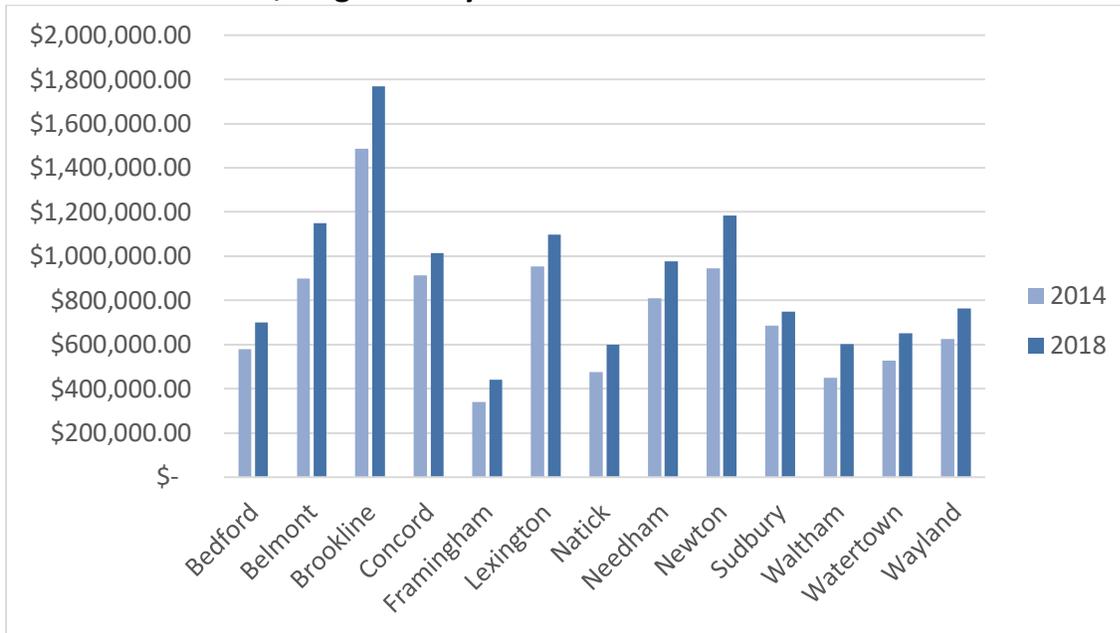
Renters' Purchasing Power in the HOME Consortium

	SF Home Affordable to Renter Earning MHI	Median Sales Price SF (2018)	Price Gap	Condo Affordable to Renter Earning MHI	Median Sales Price Condo (2018)	Price Gap
Bedford	\$325,000	\$700,000	\$375,000	\$261,000	\$646,250	\$385,250
Belmont	\$345,000	\$1,150,000	\$805,000	\$277,800	\$645,500	\$367,700
Brookline	\$380,400	\$1,770,000	\$1,389,600	\$307,600	\$815,000	\$507,400
Concord	\$328,000	\$1,014,000	\$686,000	\$264,725	\$640,000	\$375,275
Framingham	\$180,000	\$439,950	\$259,950	\$130,600	\$210,000	\$79,400
Lexington	\$427,000	\$1,098,000	\$671,000	\$355,100	\$631,600	\$276,500
Natick	\$267,100	\$600,000	\$332,900	\$208,000	\$308,500	\$100,500
Needham	\$237,400	\$976,250	\$738,850	\$180,600	\$754,900	\$574,300
Newton	\$353,900	\$1,184,750	\$830,850	\$284,700	\$665,000	\$380,300
Sudbury	\$153,200	\$750,000	\$596,800	\$107,700	\$743,154	\$635,454
Waltham	\$297,600	\$603,200	\$305,600	\$235,700	\$467,500	\$231,800
Watertown	\$382,900	\$650,000	\$267,100	\$314,700	\$519,900	\$205,200
Wayland	\$171,300	\$764,000	\$592,700	\$124,500	\$700,000	\$575,500

Sources: The Warren Group and DataCommon 2013-2017 American Community Survey

Median sales prices for single family homes rose throughout the Consortium from 2014 to 2018. This percentage change ranged from nine percent in Sudbury to 34% in Waltham. Newton's median sale price for single family homes increased 25%, from \$945,750 to \$1,150,00, during this 5-year time period. From 2017 to 2018 the real estate market for single family homes reflected price increases in seven communities, with Belmont jumping the highest at 11 percent. Brookline and Concord had a slight decrease in single family home price and the remainder of communities were stable. Sales data for the first eight months of 2019 indicates that single family home prices in the Consortium are likely to continue an upward trend. The shortage of developable land and existing housing inventory in the Greater Boston area creates a high-priced real estate market, which is not anticipated to change in the next five-years.

Median Sales Price, Single Family Homes 2014-2018

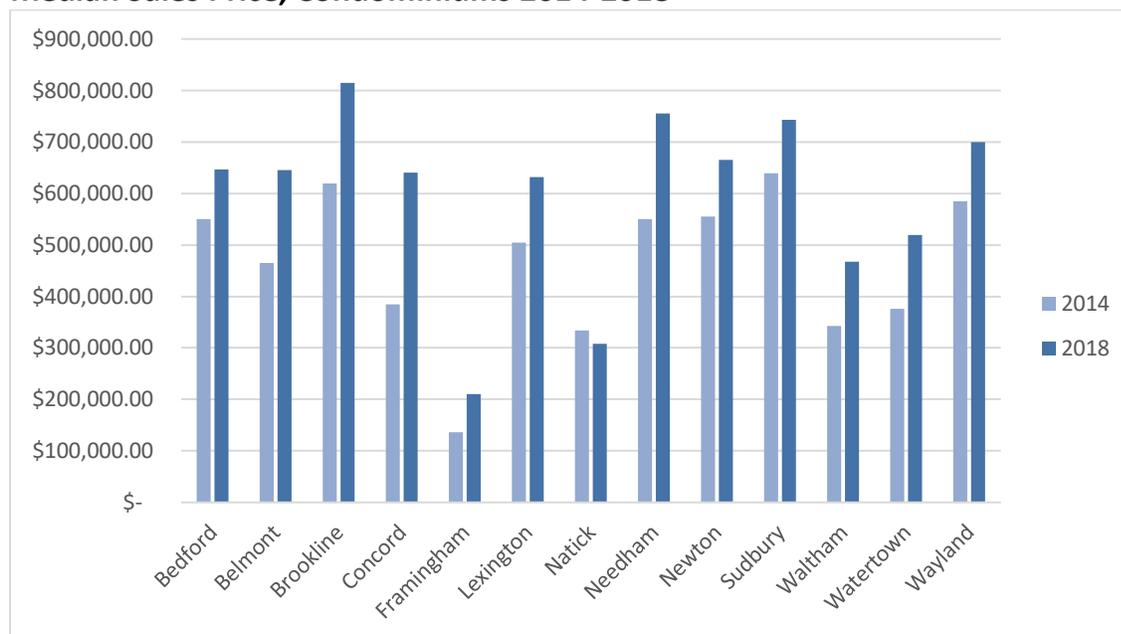


Source: Banker and Tradesman

The Consortium's condominium market showed rising strength between 2014 and 2018. Concord's median sales price of condominiums rose 66 percent, from \$385,000 to \$640,000, and Framingham's increased by 54 percent (\$136,000 to \$210,000) during this time. Natick was the only outlier community in the Consortium that experienced a decrease in the condo market, from \$334,000 to \$296,250 (eight percent) during these five years. Median condo sales in Newton rose 20 percent, from \$555,000 to \$706,000.

In the one-year period from 2017 to 2018, the change in the condo market was variable. Decreases in median sales data from Needham, Newton, and Watertown show a slight softening in the condo market in these communities. However, Belmont, Concord, Lexington, Sudbury, and Wayland exhibited robust increases in median condo sales. The remainder of the communities had increases between 1.4 percent and 4.2 percent.

Median Sales Price, Condominiums 2014-2018



Source: Banker and Tradesman

In Brookline the high cost of housing continues to displace existing residents, including seniors on fixed incomes and municipal employees. A significant population of renters and homeowners are paying more than 50% of their income towards housing expenses. With the current market conditions, it is foreseeable that property values, and hence rents, will continue to increase. Lower income households cannot sustain the market rental rates for more than one-bedroom units and they lack the resources to put an offer on the average price of a condo (\$815,000), or a single-family property at \$1.7 million.

In the past 5 years, the average assessed value for housing units in Framingham increased by 7.3 percent. In the past two years, the assessed value for rental units increased by over 10 percent. Higher assessed values increase the number of lower income households that are cost burdened, thereby making many units out of reach for this demographic even with a housing voucher.

Natick has built over 500 affordable units in the last decade, and three times as many market rate units. These units have provided rent stability during that time to both households earning near 80% of AMI as well as households leasing and buying market rate units. Recently the Town has tried to amend zoning in several cases to further increase areas that can provide higher density and affordable housing, but these proposals did not pass. It is expected there will be a built out of the remaining parcels in higher density and affordable housing zoned parcels which will trigger a general increase in housing costs throughout Natick.

The affordability of Needham's housing stock continues to erode as housing prices increase and the more modestly-priced units in the community's housing stock are demolished and replaced

by larger more expensive homes, now representing almost all of the Town's new single-family construction activity. For example, the median sales price of a single-family home was \$670,000 in 2012, the highest ever despite the recession, and then increased to \$820,000 by July 2014, and up further to \$976,250 by the end of 2018. Given the strength of the Town's school system and its accessibility to four commuter rail stations, those wanting to live and raise their children in Needham are likely to continue to increase, further driving up housing costs. The Town's Housing Profile, developed by MAPC, estimates that at least 1,289 units of housing are required to meet the needs of existing residents earning at or below 80% of median income, up from 1,142 in 2011, and additional units are needed to serve the disabled, as summarized in previous sections. Rents have also been increasing with no end in sight despite an additional supply of 526 new rental units through 40B projects.

As it becomes increasingly expensive in Boston and in the surrounding more affluent communities, more people are choosing to live in Waltham. The City offers close proximity to Boston, quick access to 128 and the Mass Pike, a direct commuter rail line, and a booming commercial district. Historically Waltham sustained a lower priced rental community in comparison to its contiguous neighbors, but this is beginning to change with a greater influx of renters. A first-time homebuyer household would need an average of \$30,000 for a 5% down payment on a market rate property in Waltham. Only 1 percent of Waltham renters have an income level high enough to afford a property at the current median value, with a 5% downpayment.

Watertown shares many similarities with Waltham, in terms of the real estate market. Housing costs in Watertown have already caused significant income burdening. These costs are continuing to increase, as people who are unable to purchase a home or rent in an apartment in Boston and other city suburbs, find Watertown to be less expensive. This movement is likely to drive housing costs further upwards.

4. How do HOME rents / Fair Market Rent compare to (market) Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

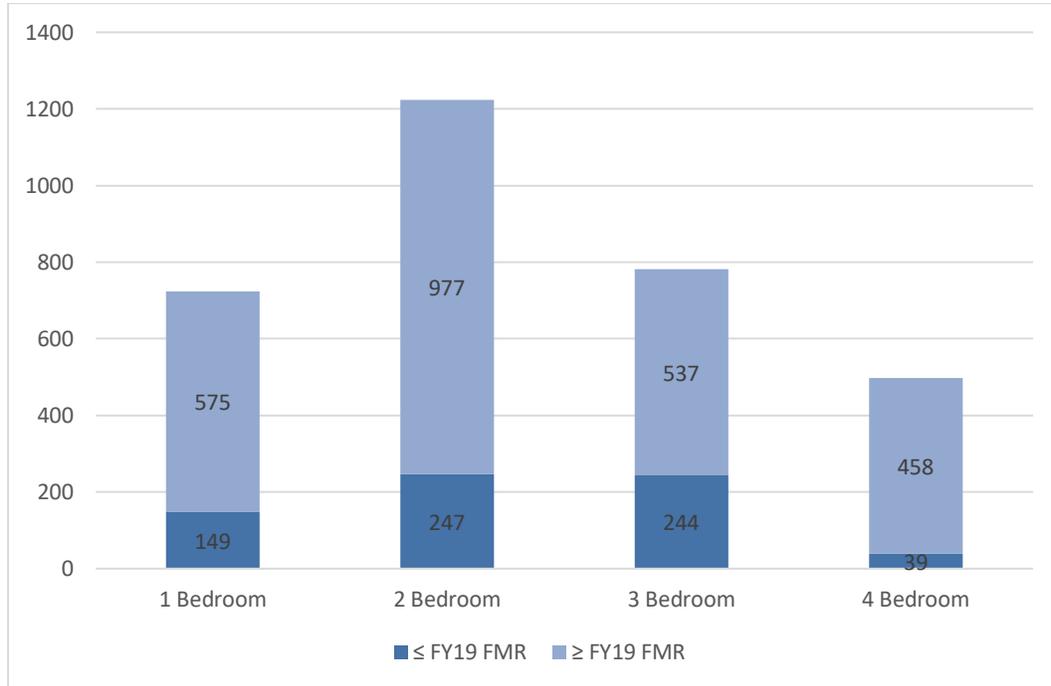
Fair Market Rents (FMR) generated by HUD for each region, are used to determine rent ceilings for units in the HOME program. These FMRs helped to assess the availability of affordable rental stock in the HOME Consortium.

FY2019 Fair Market Rent (FMR) by Unit Bedrooms

	One-Bedroom	Two-Bedroom	Three Bedroom	Four-Bedroom
Boston-Cambridge-Quincy, MA- NH Metro FMR Area	\$1,801	\$2,194	\$2,749	\$2,966
Low HOME Rent	\$1,111	\$1,333	\$1,540	\$1,718
High HOME Rent	\$1,425	\$1,712	\$1,970	\$2,178

Source: https://www.huduser.gov/portal/datasets/fmr/fmrs/FY2020_code/select_Geography.odn

Available Rental Units in the HOME Consortium



Source: HUD User; Zillow September 2019

According to a Consortium-wide Zillow search conducted in the Fall of 2019, approximately 21 percent of one-bedroom, 20 percent of two-bedroom, 31 percent of three-bedroom, and eight percent of four-bedroom rental units are considered affordable by Fair Market Rent (FMR) standards. Affordability by bedroom size varies widely within each community.

With consideration given to both quantity and price, renters are more likely to find an affordable one-bedroom unit in Brookline, Newton, Waltham or Watertown than in the

remainder of the Consortium region. These communities, in addition to Belmont and Framingham, supply nearly 94 percent of the available two-bedroom units and over 95 percent of the three-bedroom units that are priced below FMR in the Consortium. Four-bedroom rental units are the most challenging to find in the Consortium region. Waltham has the greatest number of four-bedroom units listed below FMR.

Approximately 45 percent of the 35 rental units marketed in Natick are below FMR. A total of 111 rental units were listed in Lexington and nine percent are below FMR. Twelve and half percent of the 32 rental units listed in Needham are considered affordable by FMR standards. There is very little rental housing marketed in the Towns of Bedford (13 units), Concord (22 units) and Sudbury (4 units).

Units Renting at or below (FY2019) Fair Market Rent in the HOME Consortium

Community	One-Bedroom		Two-Bedroom		Three-Bedroom		Four-Bedroom	
Bedford	0	0.00%	0	0.00%	3	60.00%	0	00.00%
Belmont	9	75.00%	23	31.94%	27	65.85%	4	40.00%
Brookline	25	5.91%	23	4.39%	38	11.91%	6	2.38%
Concord	2	40.00%	3	33.33%	0	0.00%	0	0.00%
Framingham	9	75.00%	17	77.27%	11	61.11%	2	50.00%
Lexington	3	10.00%	4	6.90%	2	15.38%	1	10.00%
Natick	5	55.56%	7	46.67%	3	37.50%	1	33.33%
Needham	0	0.00%	1	7.69%	3	30.00%	0	0.00%
Newton	51	40.16%	81	28.93%	85	39.91%	6	4.80%
Sudbury	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Waltham	26	52.00%	25	39.06%	20	50.00%	14	41.18%
Watertown	19	41.30%	63	39.62%	51	49.51%	5	10.20%
Wayland	0	0.00%	0	0.00%	1	16.67%	0	0.00%
TOTAL	149	20.58%	247	20.18%	244	31.24%	39	7.85%

Sources: HUD <https://www.huduser.gov/portal/datasets/fmr.html> and Zillow drawn in September, 2019

Most advertised rental units do not include utility costs, unlike FMR calculations. According to the Massachusetts Executive Office of Energy and Environmental Affairs, the average winter expenditure between 2013 and 2018 for heating oil was \$2,164 and \$903 for natural gas. During the same time period, Massachusetts households spent an average of \$645 on electricity. Adding average winter utility costs to advertised rents in the Consortium would decrease the percentage of units below the FMR. The amount of available, affordable rental units would drop further by accounting for summer utilities, sewer and water costs. Local feedback from Consortium members' consultations and citizen participation reinforce the high costs associated with renting in the WestMetro region.

Market rates are significantly higher than the Brookline Housing Authority payment standards and HOME rents. The expensive cost of land as well as lack of buildable, vacant parcels under current zoning causes the Town's "affordability gap," the difference between the cost of

market-rate versus income-qualified affordable units, to be higher than in most of Boston and other surrounding communities. As discussed previously this enormous affordability gap, makes producing additional affordable housing in Brookline a daunting economic challenge. The City places significant importance on preservation of existing affordable units as well as production of new affordable units.

The average market rent in the towns of Bedford, Concord, Lexington, Sudbury and Wayland is far above HOME and Fair Market Rents, except for restricted units. In the case of rents restricted to be affordable for households below 80% AMI, these costs are similar to FMR. These communities will continue to place a high importance on affordable housing production working together under the Regional Service Housing Office.

Framingham renters who have insufficient income and do not have a voucher find it difficult to afford the rents charged within the community. Many market rate and subsidized units completed under the Local Initiative Program and Inclusionary Zoning are charging higher than the average monthly rent. The City expects this trend to continue with the soon to be completed market rate units in downtown Framingham. The production of HOME-assisted rental units is a high priority for the City, as well as the rental assistance provided through the Framingham's TBRA program.

In Natick, the market rents average about \$1,800 for a two-bedroom unit, about \$1,600 for a one bedroom, but in many instances these rents are much higher. A two-person low-income household can afford to rent an apartment for approximately \$1,400, utilities included; this imposes an affordability gap of around \$400 without access to affordable units. Considering the \$1,800 market rate rent, a two- to four-person household would be required to earn at least \$72,000 annually to be over the threshold of "rent burden," defined as spending more than 30% of household income on housing. According to the U.S. Census approximately 4,500 or 35% of the two to four person households in Natick earn between \$20,000 and \$75,000. This indicates a need to not only preserve affordable housing but to significantly increase production of affordable housing in Natick.

Most market rents are significantly higher than FMRs in Needham, with rents of at least \$2,500 in older dwellings and over \$3,500 in newer multi-family development. For example, market rents that are part of the new 136-unit, mixed-income Chapter 40B development at the Modera Needham project are starting at \$3,440 for two-bedrooms. Consequently, it is not surprising that of the 939 renter households earning at or below 80% of the Median Family Income, 555 or 59% were spending too much on their housing including 355 or 38% who were spending more than half of their income on housing expenses. These figures are higher than those for 2011 when 324 renter households or 37% in this income range had severe cost burdens. The Town's focus with respect to affordable housing will be on rental unit development in appropriate locations.

Rents far exceed both High HOME rent limits and fair market rents in Newton's HUD defined metro area. In a random search conducted in September 2019 on Zillow.com of ten 2-bedroom

units, the lowest two-bedroom rent identified was \$1,675, which is only \$45 less than the High HOME rent of \$1,712 for a three-person household. Not only do 2-bedroom rents exceed High HOME rent limits and fair market rents, but the trend extends to three- and four-bedroom units as well. For instance, the average market rents for three and four-bedroom units is \$3,335 and \$3,830 respectively. There is an average difference between the market and High HOME rents for these bedroom types of \$1,365 for three-bedroom units and \$1,652 for four-bedroom units. This illustrates that many low- to moderate-income households are housing cost burdened as noted in previous sections. Additionally, this shows that the existing rental market is unaffordable and inaccessible to low- to moderate-income households both within and outside of Newton.

As a result, Newton's strategy will continue to focus on mixed-income development that incorporates affordable housing for low- to moderate-income households. The City will support developments consisting of 100% affordable housing projects, and also ensure that market-rate projects include affordable units at varied income levels, ranging from extremely low-income to moderate-income. The City can do so through the implementation of its new Inclusionary Housing Ordinance and continued use of deed restrictions when issuing federal funds. In addition to utilizing its CDBG and HOME funds, Newton will leverage a diverse array of local, state, and private dollars to maximize the development of affordable and mixed-use developments.

As of April 2019, the average rent for an apartment in Waltham was \$2,986, which is a 9.51% increase from last year when the average rent was \$2,702, and a 6.36% increase from last month when the average rent was \$2,796. One-bedroom apartments in Waltham rent for \$2,566 a month on average (a 6.9% increase from last year) and two bedroom apartment rents average \$3,242 (a 9.87% increase from last year). HOME/Fair market Rents are well below this average and do not represent the reality. The City will continue to provide HOME TBRA funds to assist eligible renters with the upfront costs of leasing and emergency assistance for those facing eviction due to rent arrears. Waltham will leverage its HOME dollars with other federal and local sources to help sustain public housing authority stock.

MA-20 Housing Market Analysis: Condition of Housing - 91.410, 91.210(a)

1. Introduction

The housing stock in the Consortium is predominantly older and 80% of units were built prior to 1980. In addition to being costly to maintain and less energy efficient, these homes have the potential to contain lead paint, which was not banned until 1978. Several communities in the Consortium, including Newton, administer federally funded income-eligible homeowner rehabilitation programs. Rehabilitation work addresses code deficiencies, abatement of lead and asbestos, as well as the removal of architectural barriers for people with disabilities. Consortium communities without rehabilitation programs refer residents to MassHousing's Get the Lead Out program, which offers deferred or low-interest loans for lead remediation.

Rental housing supplies the majority of the units that are affordable to lower income households in the Consortium, as previously stated. The *Condition of Units Table* below indicates that 42% of renter-occupied housing has "one selected condition." Possible conditions include incomplete plumbing or kitchen facilities (in addition to cost burden and overcrowding). There is a significant chance that low to moderate income renters may live in older, poorly maintained buildings, which also increases the risks associated with lead paint. Consortium communities educate residents about the dangers of lead poisoning through printed brochures, information on municipal websites, and as part of the application process for tenant based rental assistance.

2. Describe the jurisdiction's definition for "substandard condition" and "substandard condition but suitable for rehabilitation":

The primary purpose of the City of Newton's Rehabilitation Program is to correct code violations and substandard living conditions, including the removal of health hazards associated with mold, lead paint and asbestos. The Program also provides assistance for persons with disabilities who require accessibility improvements, such as the installation of handicap ramps, bathroom grab bars, etc. All work must comply with the Massachusetts State Building Code and the Massachusetts State Sanitary Code, as applicable.

Priority work includes:

- Addressing emergencies, including hoarding and the correction of other issues that, if not corrected, will adversely impact the health and safety of residents.
- Correcting conditions to be in compliance with the Massachusetts State Building Code and/or the Massachusetts State Sanitary Code. The correction of serious code violations, determined necessary by Program staff and/or an agent of the City Health and Human Services Department and/or Inspectional Services Department, are non-negotiable and must be addressed to receive Program funds.

- Correcting conditions to be in compliance with Section 8 Housing Choice Voucher Program requirements.
- Addressing environmental hazards such as lead paint, mold and asbestos.
- Correcting serious building maintenance deficiencies, deteriorated roofs, and structural deficiencies.
- Replacing obsolete heating systems.
- Removing architectural barriers for persons with disabilities including the installation of accommodations that will enable people with physical disabilities, hearing and visual impairments, etc. to remain in their house.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	32,950	27%	28,780	42%
With two selected Conditions	400	0%	1,860	3%
With three selected Conditions	14	0%	300	0%
With four selected Conditions	0	0%	15	0%
No selected Conditions	88,665	73%	37,880	55%
Total	122,029	100%	68,835	100%

HUD Table 28 - Condition of Units

Data Source: 2011-2015 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	8,033	7%	5,938	9%
1980-1999	13,994	11%	9,473	14%
1950-1979	46,669	38%	25,315	37%
Before 1950	53,299	44%	28,080	41%
Total	121,995	100%	68,806	101%

HUD Table 29 – Year Unit Built

Data Source: 2011-2015 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	99,968	82%	53,395	78%
Housing Units build before 1980 with children present	6,053	5%	4,016	6%

HUD Table 30 – Risk of Lead-Based Paint

Data Source: 2011-2015 ACS (Total Units) 2011-2015 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not suitable for Rehabilitation	Total
Vacant Units			
<i>Abandoned Vacant Units</i>			
REO Properties			
<i>Abandoned REO properties</i>			

Note: Data for this table was not provided by HUD.

3. Describe the need for owner and rental rehabilitation based on the condition of the municipality’s housing.

The housing stock in the Consortium is predominantly older, and 80% of units were built prior to 1980. In addition to being costly to maintain and less energy efficient, these homes have the potential to contain lead paint, which was not banned until 1978. Framingham, Newton, and Waltham administer federally funded income-eligible homeowner rehabilitation programs. The most common types of work completed through these program are:

- Emergency: addressing building code deficiencies that require immediate repair such as failed heaters, plumbing and electric systems and roofs
- Hazard abatement: lead paint and asbestos abatement
- Removal of architectural barriers: installation of interior and exterior modifications for persons with physical disabilities

Waltham’s rehabilitation program is designed to address weatherization improvements, given that older homes are often less energy efficient, which can lead to higher utility costs. These projects include: installation of insulation, window and door replacement, as well as weather-stripping and caulking. The Concord Housing Development Corporation and the Sudbury Housing Trust provide small grants to assist income eligible residents in making repairs to their homes for safety and health reasons. Elderly households on fixed incomes, who own smaller and more affordable homes in Newton, are the most common applicants to the City’s Housing Rehabilitation Program. The Town of Needham will be introducing a small repair grant program to provide up to \$4,000 in grant funds to qualifying seniors for health and safety repairs. This new program is based on the recognition that many long-term owners may have deferred maintenance needs that result from fixed incomes and the rising costs of living. All of the communities in the Consortium utilize federal and local funds to assist local housing authorities with improvements and emergency repairs.

Hurricanes and other wind storms, which are the most common natural hazards experienced in the Northeast, have the potential to cause flooding, damage homes, sever power, and temporarily isolate residents. According to the Massachusetts Department of Public Health, the

State is predominantly effected by climate change through hotter summers, rising sea levels, more frequent severe weather, and inland flooding. These weather patterns are predicted to degrade weather quality and compromise the infrastructure of buildings. Vulnerable populations in the Consortium and the region, including lower-income households and non-homelessness special needs individuals, experience these impacts even more negatively because of their limited resources.

4. Estimate the number of housing units within the jurisdiction that are occupied by low or moderate income families that contain lead-based paint hazards. 91.205(e), 91.405

Rental housing supplies the majority of the units that are affordable to lower income households in the Consortium (*Housing Affordability Table*). Housing stock in the Consortium is predominantly older, and 78% of rental units were built prior to 1980. These homes have the potential to contain lead paint, which was not banned until 1978. There is a significant chance that low to moderate income renters may live in older, poorly maintained buildings, which increases the risks associated with lead paint.

Massachusetts Lead Poisoning Prevention and Control Regulation requires all children to be screened for lead poisoning multiple times through the age of three. Children must be screened once more at age 4 if they live in a high-risk community or in a high-risk environment (i.e. other lead poisoned children in the same home, or a home built prior to 1978 that is under renovation). The table below indicates that there are instances of childhood lead poisoning in seven Consortium communities.

Screening and Prevalence of Childhood Blood Lead Levels in the Consortium

Community	Population 9-47 months	Percent Screened	Confirmed ≥ 10 ug/dL
Bedford	537	72%	0
Belmont	1,095	56%	NS*
Concord	463	61%	0
Framingham	3,217	66%	3
Lexington	961	57%	NS
Natick	1,457	78%	NS*
Needham	1,119	76%	0
Newton	3,021	68%	3
Sudbury	600	71%	0
Waltham	2,274	66%	3
Watertown	1,169	75%	NS*
Wayland	407	>99%	0

Source: MA Department of Health Childhood Lead Poisoning Prevention program, 2017

https://www.mass.gov/files/documents/2018/09/19/cy17-screening-and-prevalence_0.pdf

*NS means number of prevalence suppressed when N is between 1-5 and total screened is less than 1,200, to protect privacy

Rehabilitation programs in Framingham, Newton, and Waltham address the presence of lead hazards through remediation. Since 2016, three housing units required lead remediation in Framingham. The City of Waltham CDBG Lead Loan Program has provided lead loans to 31 homeowners. Nine of the lead loans included a rental unit. The Waltham HOME Downpayment Assistance Program provided HOME grant funds to homebuyers for full lead abatement in 22 properties.

Through its CDBG funds, the City of Newton has an active Rehabilitation Program for low- to moderate-income homeowners. Financial assistance for lead paint abatement is provided as a grant. A grant for the full cost of lead testing and lead paint hazard reduction is provided to low- and moderate-income owner-occupied single-family and two-family structures if the lead work is required for participation in the Program. Structures constructed after 1978 do not require testing.

Projects receiving over \$5,000 require interim control measures, including dust wipes. Projects receiving \$25,000 or more of Program assistance must be fully abated if lead paint is identified. The inspection report will identify levels of hazard, prioritize the risk, and recommend interim measures of abatement or full abatement depending on the amount of Program assistance the household is estimated to receive for the housing unit. All structures where children six years old and younger reside will receive abatement regardless of the general rehabilitation cost of the project. Through its Rehab Program, the City of Newton provides grants for full lead abatement to approximately 80% of all rehab cases.

5. Discussion

Many of the Consortium communities refer residents to MassHousing's Get the Lead Out program, which offers deferred or low-interest loans for lead remediation. New affordable construction in the Consortium is free from lead paint.

Lead-based paint and other hazards are managed by the Brookline's Health Department Division of Environmental Health. Lead hazards are treated as a violation to State Sanitary Code, and the Division implements regulations and requirements for lead removal, abatement and containment. The Massachusetts Lead Laws are followed, and contractors are required to comply with State's requirements of safe practices for renovation and lead abatement. The City refers constituents in need of lead abatement to Mass Housing agencies in charge of administering the Get the Lead Out Program, such as Urban Edge. Households with a child under 6 years of age can request an inspection by the Brookline Health Department.

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

The Needham Board of Health, which is the municipal entity responsible for overseeing lead-based paint problems locally, indicates that these issues typically relate to neighbor complaints about the potential hazards that might arise during the renovation or demolition of abutting properties. In reference to home demolitions, the Public Health Division has a Notification of Demolition form that contractors must fill out and submit for approval prior to obtaining approval from the Building Department for their demolition permit. They must also notify the Fire Department to hire a water truck to be present throughout the demolition process in order to spray down any dust debris that results from the demolition and thus prevent the risk of any lead paint dust migrating onto abutting properties. When the Public Health Division receives possible lead-based paint concerns from renters, they are handled on a case by case basis. Given that these instances are rare, they are usually referred to the MA Childhood Poisoning Prevention Program for follow-up.

The City of Newton provides grants to homeowners to de-lead their home, as part of the housing rehabilitation program. In terms of other rehabilitation work, if a participating household has children under six years old living in the home, or the scope of work triggers de-leading under the Lead Safe Housing Rules, the City must conduct a lead inspection and fully de-lead the unit as part of the overall rehabilitation project.

The Waltham Health Department acts to address lead paint hazards after receiving notification from the State that a blood test shows that a child has an elevated blood lead level. Landlords and homeowners are provided a lead inspection by the city and supplied information about the city's rehabilitation program that provides interest free deferred loans to address lead paint abatement (up to \$15,000 per unit). The Housing Department administers the CDBG-funded lead paint program to income eligible homeowners and or to landlords who have low to moderate income tenants. Owners or tenants must be within the HUD income guideline at or below 80% of the AMI. If owners and/or tenants are above the income requirements they are referred to Mass Housing Loan programs. Even with resources for remediation, landlords can carry a significant financial burden for lead removal, which makes them less likely to address the issue. In addition, federal and state support for lead removal is limited and conditional; not every house receives federal or state funds for full abatement.

Watertown refers residents to the Childhood Lead Poisoning Prevention Program and the MassHousing Get the Lead Out Loan Program. Inspectors from the City's Health Department are also trained to do a basic lead-based paint determination on home inspections. These inspections are reactive, in that they are generated from complaints to the Department.

MA-25 Public and Assisted Housing - 91.410, 91.210(b)

1. Introduction

Throughout the Consortium there are approximately 5,507 public housing units, of which 4,420 are accessible to persons with disabilities. Housing authorities work with limited budgets to keep each development safe and well-maintained, however most state and federal units have fallen short of capital improvements. HOME funds are needed to assist with the rehabilitation and preservation of public housing. Modernization efforts range throughout the local Consortium communities and include new roofs, improved heating systems, energy efficiency, plumbing and electrical system replacements, bathroom and kitchen updates, and brick repointing.

Over the period covered by the Consolidated Plan (FY21-FY25), Consortium communities will support local public housing authorities (PHAs) in their efforts to improve the living environment of public housing residents. PHAs in Brookline, Framingham, and Needham are undertaking extensive, multi-year rehabilitation projects with the assistance of HOME funding. Other communities, including Newton, provide on-going financial assistance to their PHA with CDBG, HOME, and CPA funds.

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	23	1,714	3,149	38	1,225	0	0	2,086
# of accessible units			110						

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

HUD Table 31 – Total Number of Units by Program Type

Data PIC (PIH Information Center)

Source:

2. Describe the supply of public housing developments.

Please see the [MA-25: Public Housing Authority Units in the HOME Consortium Table](#) at the end of this section.

3. Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

Please see the [MA-25: Public Housing Authority Units in the HOME Consortium Table](#) at the end of this section.

4. Describe the restoration and revitalization needs of public housing units in the community.

The Brookline Housing Authority prioritizes its properties through a capital improvements program for the family and elderly/disabled public housing developments. The capital program includes the development and oversight of state-funded (DHCD) and federally-funded (HUD) capital budgets, long-term planning and the selection and management of architects/engineers and contractors. Priority goals for the capital program are to maintain the BHA's housing in good, safe condition and accessible for all. Modernization efforts include new roofs, improved heating systems, energy efficiency and controls, plumbing or electrical system replacements, and brick repointing.

Housing Authorities in Bedford, Concord, Lexington, Sudbury, and Wayland generally report the properties are aging and in fair conditions with ongoing maintenance and capital improvement needs. Bedford public housing units require new roofs and kitchen, bath, and plumbing updates. Lexington elderly developments need new kitchens, baths, electrical, plumbing and accessibility improvements. The single-family public housing authority homes in Lexington need new roofs, windows, gutters, kitchen renovations and site improvements.

A major rehabilitation of Framingham Housing Authority's family units is currently in the planning stage.

All of the units in the Natick Housing portfolio were constructed at least 25 years ago. There are 312 units that were built before 1975 and of those 144 units were built before 1960. These units have been maintained, but many still have the original or severely outdated kitchen and bathroom facilities.

Both the federal and state funded Needham Housing Authority (NHA) units have been historically and chronically underfunded, resulting in deferred maintenance. Major capital improvement projects, expansion of housing options, and accessibility improvements have been impacted by the lack of funding. All public housing units are in need of improvement and modernization. This past year, the NHA hired consultants to prepare a Facilities Master Plan that evaluated conditions at all of their developments, detailing restoration and revitalization needs.

The Newton Housing Authority's revitalization needs include: roof and hand rail replacement at Parker House; concrete canopy and balcony replacement at Horace Mann; storm doors and hot

water tank replacement at Norumbega; brick repointing at Nonantum Village; window replacement at Hyde School; and roof replacement at Hamilton Grove.

Public housing authority units within the City of Waltham are underfunded and in need of funding to sustain the units in perpetuity. Energy improvements, security, and accessibility are paramount among these priority needs. Recently, HOME dollars funded substantial improvements in six state-funded Waltham Housing Authority properties. These included the installation of HVAC systems, new roofs, flooring, common areas, accessible kitchens, baths, railings, walkways, and a fire suppression system. The Waltham Housing Authority shared the following data on the current restoration and revitalization needs of their portfolio: less than 40% of WHA units require site improvements; less than 25% of WHA units will require new roofing in the next 1-5 years; less than 10% of WHA units will require new heat/hot water units in the next 1-5 years; and 15% of WHA units require bath and kitchen modernization.

The Watertown Housing Authority's modernization need is estimated at over \$30 million.

5. Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing.

The Brookline Housing Authority is undertaking a major, multi-year campaign to rehabilitate and preserve its properties through the Rental Demonstration Program (RAD). The RAD program enables housing authorities to switch properties from a public housing operating subsidy to HUD Section 8, a more reliable subsidy that provides a higher level of annual funding. The Town of Brookline will work to support the BHA through this process and may provide local gap funding to maximize project objectives. The Town also continues to partner with the BHA in supporting minor scale renovation, energy efficiency and modernization projects.

Since its passage, Belmont Town Meeting has approved over \$1,000,000 in CPA funding for public housing projects, the majority of which was used to upgrade and renovate the existing developments. Over the next five years, the Town will investigate development opportunities at several of the Housing Authority properties with the expectation that additional units can be added.

Housing Authorities in Bedford, Concord, Lexington, Sudbury, and Wayland all work to improve the living environment of their residents through ongoing assessment and planning for maintenance and capital improvements. The Housing Authorities utilize operating reserves as well as federal, state and local subsidies for ongoing general maintenance and capital improvements. Bedford, Lexington and Concord have all utilized HOME funds to assist in funding capital improvement and rehabilitation projects for their aging portfolio.

The Framingham Housing Authority is in the process of planning for an extensive rehabilitation project of its family public housing project in South Framingham. The development was built in 1950 and is in need of a major renovation.

The Natick Housing Authority's mission is to provide decent, safe and affordable housing; to meet or exceed industry standards in the administration of all the Authority's programs; work with The Town of Natick agencies in identifying and addressing housing needs; to maintain public confidence in the operations of the Authority; and to maintain protocols to improve the overall delivery of services to our residents as well as meeting industry standards.

The Needham Facilities Master Plan included a number of options and recommendations for improving and modernizing Housing Authority developments as well as initiating new development on existing property. The NHA is in the process of obtaining consultant services to apply for modernization funds through the Federal Rental Demonstration Program, funded in part by Town CPA funds.

The Newton Housing Authority prioritizes health and safety, accessibility, building systems, and energy efficiency capital projects. The Newton Housing Authority has greatly expanded its Resident Services Department to include two bilingual licensed social workers.

The Waltham Housing Authority (WHA) engages in ongoing assessment of the capital and maintenance needs of its housing stock to ensure that the residents receive clean, safe and functional housing. The Authority works very closely with the local police department to ensure a safe environment for its residents. Property managers and service coordinators attempt to identify tenant issues as early as possible to seek quick and effective resolutions. Resident Advisory Boards are encouraged and periodic meetings are scheduled between WHA staff and residents to discuss issues of mutual concern. Additional services are also offered at family low-income facilities such as: educational services and other programming aimed at empowering the residents; after-school programs; GED classes, computer and college readiness classes; reading room for children; and summer programs.

The Watertown Housing Authority utilizes the State's modernization program, through its "formula funding." The WHA also involves residents through its Board meetings and encourages tenant-led organizations at its developments.

MA-25 Public Housing Authority Units in the HOME Consortium

Community	Development	Number of Units	Population Served	Condition
Bedford	CH 667-1	40	Elderly/disabled	NA
Bedford	CH 667-2	40	Elderly/disabled	NA
Bedford	CH 200 -1	12	Family	NA
Bedford	CH 167-1	8	DMH	NA
Belmont	Belmont Village	100	Family	NA
Belmont	Sherman Gardens	81	Elderly/disabled	NA
Belmont	Waverly Oaks	74	Elderly/disabled	NA
Belmont	Scattered site	2	Disabled	NA
Brookline	Walnut Street Apartments	76	Family/Elderly	NA
Brookline	Walnut Street Apartments	19	Elderly	NA
Brookline	Walnut Street Apartments	6	Elderly/Disabled	NA
Brookline	Sussman House	8	Disabled	NA
Brookline	Sussman House	92	Elderly	NA
Brookline	O'Shea House	6	Disabled	NA
Brookline	O'Shea House	94	Family/Elderly	NA
Brookline	Morse Apartments	1	Disabled	NA
Brookline	Morse Apartments	99	Elderly	NA
Brookline	Kickham Apartments	4	Disabled	NA
Brookline	Kickham Apartments	35	Elderly	NA
Brookline	Col. Floyd Apartments	60	Elderly	NA
Brookline	High St. Veterans	177	Family	NA
Brookline	Egmont St. Veterans	114	Family	NA
Brookline	Trustman Apartments	86	Elderly/Family	NA
Brookline	St. Paul Street	1	Elderly	NA
Brookline	Browne Street	1	Elderly	NA
Brookline	McCormack House	10	Disabled	NA
Brookline	Connelly House	13	Disabled	NA
Brookline	Kilgallon House	8	Disabled	NA
Concord	Everett Gardens	32	Elderly/disabled	NA
Concord	Everett Gardens Exp	20	Elderly/disabled	NA
Concord	Peter Bulkeley Terrace	28	Elderly/disabled	NA
Concord	399-401 Bedford St	8	Family	NA
Concord	153-157 Strawberry Hill	6	Family	NA
Concord	267-279 Walden/35 Grove	7	Family/1 BR	NA
Concord	282 Thoreau	6	Disabled	NA
Concord	284-286 Thoreau	3	Family	NA
Concord	Scattered sites	22	Family/1 BR	NA
Concord	409-411 Old Bedford Rd	4	Elderly/1 BR	NA
Framingham	Ch 200	75	Family	Pass
Framingham	Musterfield (Tax Credit)	110	Family	Pass
Framingham	Ch 705	76	Family	Pass
Framingham	Ch 667	536	Elderly	Pass
Framingham	Ch 689	24	Elderly	Pass
Framingham	MA 028-01 (Federal)	125	Family	Pass
Framingham	MA 028-02 (Federal)	110	Elderly/Disabled	Pass
Framingham	FHDCII Nonprofit	12	Family	Pass
Lexington	Countryside Village	60	Elderly/disabled	Good
Lexington	Scattered sites	17	Family	Fair
Lexington	Greeley Village	104	Elderly/disabled	Fair
Lexington	Vynebrooke Village	48	Elderly/disabled	Fair
Lexington	DMH Houses	5	Disabled	Fair
Lexington	Parker Manor	7	All	Fair
Lexington	Pine Grove Village	5	All	Poor

Community	Development	Number of Units	Population Served	Condition
Lexington	Bedford Street	2	Family	Poor
Natick	Various	422	Various	NA
Needham	Linden Place	152	Elderly/Disabled	NA
Needham	Seabeds Way	46	Elderly/Disabled	NA
Needham	Captain Robert Cook Drive	30	Family	NA
Needham	60 High Rock	60	Family	NA
Newton	Parker House (federal)	33	Elderly/Disabled	93C
Newton	Jackson Gardens (federal)	64	Elderly/Disabled	93C
Newton	Horace Mann (federal)	72	Elderly/Disabled	93C
Newton	Norumbega Gardens (federal)	57	Elderly/Disabled	93C
Newton	Echo Ridge (federal)	36	Elderly/Disabled	86C
Newton	Nonantum Village (federal)	36	Elderly/Disabled	90B
Newton	Hamilton Grove (federal)	42	Elderly/Disabled	90B
Newton	Hyde School (state)	13	Elderly, Disabled, and Family	NA
Newton	Beaconwood (state)	20	Family	NA
Newton	Family Scattered Sites (state)	59	Family	NA
Newton	Elderly/Disabled Scattered Sites (state)	6	Elderly/Disabled	NA
Newton	Centenary Village (state)	12	Elderly/Disabled	NA
Sudbury	State Public	4	Elderly	NA
Sudbury	State Public	60	Disabled	NA
Sudbury	State Public	16	Family	NA
Sudbury	Project based	11	Family	NA
Sudbury	LIP	1	Family	NA
Waltham	269-279 School St.	24	Elderly/Disabled	Fair
Waltham	298-324 Grove St.	60	Elderly/Disabled	Fair
Waltham	75-85 Myrtle St.	24	Elderly/Disabled	Good
Waltham	82-86 Orange St.	32	Elderly/Disabled	Good
Waltham	101 Prospect St.	59	Elderly/Disabled	Good
Waltham	300 South St.	20	Elderly/Disabled	Good
Waltham	37 Banks St.	7	Disabled	Excellent
Waltham	15 Townsend St.	8	Disabled	Excellent
Waltham	146-148 Hammond St.	8	Disabled	Good
Waltham	284 South St.	6	Disabled	Good
Waltham	231-237 School St.	16	Elderly/Disabled	Good
Waltham	56-62 Pond St.	24	Elderly/Disabled	Good
Waltham	100 Cedar St.	22	Elderly/Disabled	Good
Waltham	94-120 Pond St.	47	Elderly/Disabled	Good
Waltham	46-48 Dale St.	36	Elderly/Disabled	Good
Waltham	48 Pine St.	120	Elderly/Disabled	Good
Waltham	2 Prospect Hill Rd.	140	Family	Good
Waltham	300 Lexington Street	100	Family	Good
Waltham	5 Brookway Rd.	1	Disabled	Excellent
Waltham	7-15 Gardner St.	32	Family	Fair
Waltham	113-119 Bright St.	4	Family	Fair
Waltham	20 Gormans Court	4	Family	Fair
Waltham	326-340 Grove St.	8	Family	Good
Waltham	35-45 Marguerite Ave.	2	Disabled	Excellent
Waltham	288-298 South St.	6	Family	Good
Watertown	667-1 (State)	40	Elderly	NA
Watertown	667-2 (State)	164	Elderly	NA
Watertown	667-3 (State)	72	Elderly	NA
Watertown	93-1 (Federal)	50	Elderly	NA
Watertown	200-1 (State)	24	Family	NA
Watertown	200-2 (State)	60	Family	NA

Community	Development	Number of Units	Population Served	Condition
Watertown	2003 (State)	144	Family	NA
Watertown	705-1 and 705-2 (State)	12	Family	NA
Watertown	689-1 and 689-2 (State)	23	Special Needs	NA
Wayland	Bent Park	56	Elderly/disabled	Good
Wayland	Cochituate Village Apartments	56	Elderly/disabled	Good
Wayland	Family scattered site	25	Family	Good

	Bedford	100		
	Belmont	257		
	Brookline	910		
	Concord	136		
	Framingham	1068		
	Lexington	248		
	Natick	422		
	Needham	288		
	Newton	450		
	Sudbury	92		
	Waltham	810		
	Watertown	589		
	Wayland	137		

Total PHA Units in the Consortium

5,507

MA-30 Homeless Facilities and Services - 91.410, 91.210(c)

1. Introduction

In FY20 (FFY19), the City of Newton's ESG program provided approximately \$150,500 to five nonprofit organizations: Brookline Community Mental Health Center, Community Day Center of Waltham, Middlesex Human Service Agency, REACH Beyond Domestic Violence, and The Second Step, Inc. The ESG funds support the nonprofit organizations' emergency shelter for homeless individuals, transitional housing and supportive services to survivors of domestic violence and their families, and case management and supportive services to prevent individuals and families from becoming homeless and to house homeless individuals and families across the Brookline Newton Waltham Watertown (BNWW) region.

The City of Newton and its ESG subrecipients also actively participate in the BoS CoC's Coordinated Entry process to assess the housing needs of homeless individuals and to meet those needs through the housing placement of available units across the 80+ member communities in the CoC. According to the 2019 Housing Inventory Count, there are a total of 4,874 beds across the CoC with 479 beds located in the BNWW region. Of the beds located in the BNWW region, 46% of the beds are located at emergency shelters and 18% are located at transitional housing facilities.

Facilities Targeted to Homeless Persons

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	43	120	82	1	0
Households with Only Adults	57	0	6	66	0
Chronically Homeless Households	0	0	0	43	0
Veterans	0	0	0	0	0
Unaccompanied Youth	0	0	4	0	0

Source: 2019 Housing Inventory Count (HIC) for Brookline-Newton-Waltham-Watertown region, conducted by BoS CoC.

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year-Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	1,757	120 (overflow)	8258	541	58
Households with Only Adults	298	115 seasonal	104	781	18
Chronically Homeless Households	0	0	0	598	18
Veterans	14	0	96	529	0
Unaccompanied Youth	4	0	0	0	0

Source: 2019 Housing Inventory Count for entire Balance of State Continuum of Care (BoS CoC) region, conducted by BoS CoC.

2. Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons.

Recipients of ESG funds must coordinate and integrate, to the maximum extent possible, funded activities with mainstream housing, health, and social services, employment, education, and youth programs for homeless and at-risk of homeless individuals and families, who may be eligible.

ESG recipients work to ensure that participants are accessing all available benefits, including Supplemental Nutrition Assistance Program (SNAP) food stamps, Medicaid, Emergency Aid to the Elderly, Disabled and Children (EAEDC), Social Security Disability Insurance (SSDI). Recipients collaborate with the Massachusetts Department of Mental Health, Department of Public Health, Department of Developmental Services, Bureau of Substance Addiction Services, Office for Victim Assistance, and public housing authorizes in the region. Additionally, recipients make referrals to detox and rehab facilities including Rides to Recovery, vocation services at Operation Able, spiritual services at Chaplains on the Way, mental health services at Advocates, Inc., and employment services at PeopleReady Temp Agency.

The Brookline Community Mental Health Center utilizes ESG funds to work with people at risk of homelessness and also works with the Brookline Housing Authority for homelessness prevention. The Center offers outpatient mental health services for groups, individuals, adults and other social services to 4,000 outpatients and approximately 2,000 in-patients. Families, who are usually living in a shelter, are provided housing and case management for a six to twelve month period until such time as they reach specific goals outlined in a self-sufficiency plan. The Center works with numerous government agencies and nonprofits, and helps families to stabilize their living situation often through negotiating with a landlord, site manager, assisting with budgeting challenges, and providing vocation referrals.

Bedford, Concord, Lexington, Sudbury, and Wayland provide social services through local and regional human service agencies, often in collaboration with local housing authorities. Local human service agencies include the Boards of Health, Councils on Aging, Commissions on Disabilities and Veteran's Services; all these agencies work with homeless individuals or households at risk for homelessness and refer them to regional services where appropriate. Due to an increased need, the Town of Sudbury social worker has formed a taskforce on homelessness as well as developed a detailed resource guides to assist individuals facing homelessness.

Wayland Housing Authority participates in the federal Family Self-Sufficiency (FSS) program. The Wayland FSS program, through a dedicated caseworker, provides support services and information to Section 8 voucher families to help them obtain employment that will lead to economic independence and self-sufficiency.

South Middlesex Opportunity Council (SMOC) is the main service provider for homeless individuals and families in Framingham. SMOC provides wrap around services to address many of the needs faced by this population. For physical health services SMOC refers clients to the Edward Kennedy Community Health Center which is located within South Framingham to receive vital services such as income supports, health insurance, and Medicaid and other vital services. Clients are also referred to the various disability providers within the community such as Advocates, Wayside, MetroWest Legal Services, and the MetroWest Center for Independent Living.

The Natick Service Council (NSC) is an advocacy, referral, case management, and information center that serve the most economically disadvantaged members of the Natick community. NSC provides a broad range of human and social services programs. These services include case management; food security; emergency financial assistance for rent; home heating fuel; utilities; after school programs; behavioral health and substance abuse screening; and employment and/or training programs.

Local and regional human service agencies, including the Board of Health, Council on Aging, Commission on Disabilities, and Springwell (the Area Agency on Aging and formerly called West Suburban Elder Services) are available to serve some of Needham's most vulnerable residents including the elderly and/or those with very low incomes who may be at risk of potential homelessness. The Needham Police Department sometimes encounters homeless individuals who are typically passing through town but not from the community, and they refer them to area shelters or other appropriate resources. Infrequently, the police come across a local resident who is at risk of becoming homeless and they work with area service providers to help arrange necessary services for these individuals.

Middlesex Human Service Agency (MHSA) provides intensive, emergency support to those affected by homelessness, substance use disorders and hunger. Eight high-impact MHSA programs are located in Waltham. In partnership with dozens of state, community, educational

and service organizations, MHSA provides families and individuals the tools to build lasting independence with the help of an extensive community network. Staff members are trained to identify trauma, domestic violence, substance abuse, food insecurities, financial stability, health issues, and the critical barriers commonly faced by the homeless.

The Community Day Center (CDC) of Waltham provides case management services and assists the homeless population with a variety of services and issues, including access to health insurance; applying for food assistance; securing detox /rehabilitation facilities; finding medical and psychological services; applying for housing; assisting with probation and parole issues, locating night shelter accommodations; and conducting a job search. The CDC offers on-going programs that are designed to provide support and guidance in making lifestyle choices including one geared to those guests who seek hands-on work experience that can help open doors to future employment. This program is currently led by volunteers, and interested guests are offered the opportunity to work in various capacities at the Community Day Center in an effort to gain skills in best practices in the workplace.

The Watertown Senior Center has licensed social worker who advocates for frail elders. This staff persons provides counseling, referral to outside agencies (i.e. Springwell, SHINE), help with emergency assistance, MassHealth/Medicare applications, fuel assistance and food stamps.

3. List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth.

In FY20 (FFY19), the City of Newton's ESG program provided approximately \$150,500 to five nonprofit organizations: Brookline Community Mental Health Center, Community Day Center of Waltham, Middlesex Human Service Agency, REACH Beyond Domestic Violence, and The Second Step, Inc. The ESG funds support the nonprofit organizations' emergency shelter for homeless individuals, transitional housing and supportive services to survivors of domestic violence and their families, and case management and supportive services to prevent individuals and families from becoming homeless and to house homeless individuals and families across the BNWW region.

The City of Newton and its ESG subrecipients also actively participate in the BoS CoC's Coordinated Entry process to assess the housing needs of homeless individuals and to meet those needs through the housing placement of available units across the 80+ member communities in the CoC. According to the 2019 Housing Inventory Count, there are a total of 4,874 beds across the CoC with 479 beds located in the BNWW region. Of the beds located in the BNWW region, 46% of the beds are located at emergency shelters and 18% are located at transitional housing facilities. Below is a breakdown of the total number of beds in the CoC, including beds in emergency shelters, transitional housing, permanent supportive housing, and permanent housing units designated for individuals and families who have left homelessness.

The Brookline Community Mental Health Center (BCMHC) manages a Homeless Family Program, funded by the Massachusetts Department of Housing and Community Development to facilitate placement of families in shelters. BCMHC and the Brookline Housing Authority collaborate to provide case management services for many of BHA's residents. The BCMHC also administers a safety net program for Brookline residents. This program provides emergency funds to residents that may have issues with rent; or who don't have enough money for food or transportation. The program can provide food cards, and offers help with heavy chores, insect infestation and other similar issues. Other key partners in meeting the needs of homeless persons and families include C3 a healthcare entity, Center Communities of Brookline, Pine Manor College, and the Brookline Police Department.

The communities of Bedford, Concord, Lexington, Sudbury, and Wayland rely on regional service providers and facilities to meet the needs of homeless persons. Those regional providers such as Southern Middlesex Opportunity Council (SMOC), the Massachusetts Department of Transitional Assistance (DTA) and Bridge over Troubled Waters (at risk youth), Caritas Communities (Veterans Housing) are described further in this section. Within these communities, the Bedford Veteran's Quarters, a regional resource for veterans experiencing homelessness, provides 60 single room occupancy units for homeless veterans as well as on-site access to supportive services. Additionally, the Bedford Green property provides 70 housing units for homeless veterans aged 55 and over.

There are currently 617 beds in Framingham for homeless families. The breakdown of these beds is as follows: domestic violence households (30), HIV households (12), emergency (481), permanent housing (134), and individuals (93). SMOC provides most of the beds within Framingham. Case management services are provided weekly to each household when they enter the facility.

Framingham's Veteran Service Officers refer local veterans to the Bedford VA office to obtain a VASH voucher that combines a housing voucher with case management and clinical services provided by the Department of Veteran Affairs.

Wayside Family Services has a program in downtown Framingham focusing on unaccompanied youth. Tempo Young Adult Resource Center provides two transitional housing units for unaccompanied youth and four emergency shelter beds for unaccompanied youth. The youth living in the transitional housing units are provided case management and clinical support. Wayside conducts a risk assessment and physical assessment on youth living in the emergency shelters units before they are eligible to receive services at Tempo.

The Natick Service Council (NSC) is an advocacy, referral, case management, and information center that serve the most economically disadvantaged members of the Natick community. NSC provides a broad range of human and social services programs. These services include case management; food security; emergency financial assistance for rent; home heating fuel; utilities; after school programs; behavioral health and substance abuse screening; and employment and/or training programs.

The Needham Housing Authority provides emergency placement for those who are homeless. The Massachusetts Department of Transitional Assistance (DTA) receives some referrals from Needham residents who request emergency assistance. DTA in Framingham, the office in closest proximity to Needham, will conduct an interview, determine eligibility for emergency assistance, and request approval from the central office before placing the family shelter or a hotel. There are a number of shelters in the Framingham area, primarily developed by the Southern Middlesex Opportunity Council (SMOC), in both congregate houses and scattered site apartments. There are also several shelters for individual adults who are homeless, including one in Natick.

Waltham has several community shelters and accompanies resources for homeless individuals and families, including veterans.

- Bristol Lodge Men's Shelter – provides temporary, emergency shelter accommodations, 45-beds for adult men (ages 18 and over), including wrap-around case management services.
- Bristol Lodge Women's Shelter - provides temporary, emergency shelter accommodations, 12-beds for adult women (ages 18 and over), including wrap-around case management services.
- Hurley House –recovery home for 20 adult men.
- Mary's House – family emergency shelter program, providing eight families provided with a safe place to stay and personalized case management services.
- Bristol Lodge Soup Kitchen – serves hot, nutritious, meals every evening to those in need. The Soup Kitchen is open 365 days per year.
- Bristol Lodge Food pantry – supplies non-perishable food items to anyone in need.
- Community Day Center – day shelter.

Watertown employs a Social Service Resource Specialist from Wayside Youth & Family Support Network, whose focus is on persons age 18 to 60. This Specialist assists with preventing homelessness. The Support Network also has a variety of programs for children, young adults and families. The Watertown Veterans' Service Agent works with veterans and their families to prevent homelessness or made the appropriate referrals should homelessness occur.

MA-35 Special Needs Facilities and Services - 91.410, 91.210(d)

1. Introduction

As defined by the Department of Housing and Urban Development, the population of non-homeless persons with special needs includes elderly, frail elderly, persons with mental, physical, developmental disabilities, persons with alcohol or other drug addiction, persons with HIV/AIDS and their families, and public housing residents. The needs of public housing residents have been identified in Sections NA-35 and MA-25, therefore MA-35 focuses on the remaining populations of non-homeless special needs persons.

2. Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs.

Based on the 2012-2016 American Census Survey (ACS), there are 6,979 Newton residents living with a disability and more than half are ages 65 years and older (56%) as many individuals will develop physical disabilities as they age. To help meet the City's disability housing needs, there are 542 housing units or rooms available to income-eligible people with special needs. According to the 2016 *Newton Leads 2040 Housing Strategy*, the units are part of federal and state housing programs or are subsidized by the Massachusetts Department of Development Services and Department of Mental Health. In addition, approximately one-third of the units (184) are designated specifically for people with disabilities and special needs, with the remaining two-thirds of the units (358) are available to senior citizens.

According to projections provided by MAPC, by 2030 Brookline's population could reach 65,951, with significant growth in the age group of seniors 75 years and older. There is a documented need for affordable senior housing. Seniors also benefit from fuel assistance and help supplementing food or Medicare benefits. Brookline Housing Authority tenants are in need of case management that address basic life skills, as well as comprehensive planning including accessing health services, job training or behavioral health resources.

Bedford, Concord, Lexington, Sudbury, and Wayland's population of older residents is projected to increase significantly in the coming years. These residents are more likely than non-elderly residents to have low incomes and greater need for supportive services. Many towns are actively working to increase social services and housing options for older residents to allow them to continue to reside in the community. These communities rely on robust social service programs led by Council's on Aging and regional partners. There are over 554 age restricted affordable housing units available through local housing authorities and private owners through-out Bedford, Concord, Lexington, Sudbury, and Wayland as well as other private (non-subsidized) age-restricted units. Additionally, there are 130 affordable housing units for veterans in Bedford.

Based on the 2012-2016 American Census Survey (ACS), between 6.2 – 12% of the total population are residents with a disability in the communities of Bedford, Concord, Lexington, Sudbury, and Wayland. To help meet the housing needs of the disabled there are 207 units of housing supported by the Massachusetts' Department of Development Services and Department of Mental Health and 52 housing units in group homes available for special needs populations in these communities. There are a variety of providers in the area that offer supportive services to the disabled community. Minuteman ARC and The Guild for Human Services serve children and adults with disabilities.

In Framingham, there is a critical need for more affordable housing options for non-homeless special needs populations. Specifically, the elderly and disabled populations need accessible units at lower price points than market rate. In addition, elderly residents who live in older homes and want to stay in their community need help with renovations to make their homes accessible. In many cases their fixed incomes also do not allow for needed repairs and up keep. Isolated elderly need services and programs that improve their access to technology. Housing options for this population need to be developed in locations closer to services centers, like the Callahan Center and BayPath Elder Services. Victims of Domestic Violence and persons with addictions need affordable, sometimes family-friendly housing close to services and support as they get back on their feet. This population benefits from housing with easy access to transit and jobs.

A report prepared by the Needham Council on Aging and Public Health Division in 2016 involved a survey of local seniors and special focus groups and found that the most prominent theme was the lack of affordable and senior-appropriate housing in the community. Survey feedback also indicated that when smaller homes are demolished the replacement homes or condos generally cost more than people can expect to receive when they sell their current houses. Residents are compelled to either stay in their current homes, regardless of whether it is accessible and sized to meet their current needs, or move to another town. A number of residents expressed their preference to move to one-floor living in a condo with the added benefit of limited upkeep. Many older Needham residents have options to make home modifications to improve accessibility, however, in some instances such modifications are not practical due to the high cost of the renovation or the architectural configuration of the home. Moreover, while Needham has a number of assisted living options for seniors, they are largely beyond the means of most long-term residents.

Non-homeless special needs populations in Waltham require services in supportive housing that focus on housing stability. Supportive housing needs include: rental assistance for security deposit and first month's rent for low and very low income households, full rental assistance program for the homeless and near homeless, emergency utility assistance for households with utility shutoffs, financial management and food assistance.

For those living in Watertown Housing Authority properties (generally the elderly, frail elderly and persons with disabilities), the immediate need is for transportation and case management

services. Families in WHA properties are seeking money management assistance and substance abuse counseling.

3. Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing.

Framingham supports the South Middlesex Opportunity Council, Advocates, Wayside Youth and Family and other programs in the City, which provide wrap-around services for those returning from mental and physical health institutions. This includes access to social workers and assistance with transitional and low-cost housing opportunities. City staff often refer clients to these agencies for assistance. In addition, the United Way manages a “211” call service that helps people locate the services that they might need. The City partners with some of these agencies on a Downtown Task Force, organized around working with transient, sometimes treatment-resistant population to ensure they have information about services available and to enhance interagency coordination.

Bedford, Concord, Lexington, Sudbury, and Wayland rely on the services provided at individual housing facilities to support persons returning from mental and physical health institutions. Additional community services are also available through local and regional service providers.

The Town of Needham has 123 units in special needs facilities that includes eight units owned and managed by the Needham Housing Authority (Matthews House) as well as five other such facilities that altogether total an additional 26 affordable housing units (including the Highland Avenue ARC project, Marked Tree Road, 299 and 929 Webster Street, and West Street Apartments). There are also 89 units in group homes for Massachusetts Department of Developmental Services (DDS) clients scattered throughout town. Several years ago, the Town supported a group home for five (5) severely physically and cognitively disabled adults that was subsidized by HOME Program funding, local Community Preservation funds, and other sources. Approximately 13.5% or 27 of NHA’s units at Linden-Chambers and Seabed’s Way are reserved for younger disabled residents. Springwell provides a wide range of services to help seniors remain healthy and independent and has a care coordinator at the Housing Authority to provide support to elderly tenants. Springwell staff suggest that there are outstanding local needs in related to senior safety issues and home modifications.

The Town of Needham also created an Elder Services District by Town Meeting in 2010, and the developer of Wingate at Needham Nursing Home received the go-ahead to build a senior housing facility on Gould Street next to its Nursing Home at 589 Highland Avenue. The building includes 91 total units – 12 Independent Living Apartment units (13 bedrooms), 42 Assisted Living units, and 37 assisted living units specializing in Alzheimer’s and other memory loss related conditions. The project includes two affordable units. An additional phase added 52 independent living units including five affordable units.

In FY18 (FFY17), the City of Newton released a Request for Proposals for the development of an underutilized, municipally-owned site located at 160R Stanton Avenue. 2Life Communities,

formerly known as Jewish Community Housing for the Elderly, was selected as the developer to expand their existing Golda Meir House at 160 Stanton Avenue and to develop nine to twelve units of permanent supportive housing for chronically homeless adults with disabilities.

To successfully provide permanent supportive housing, 2Life Communities has partnered with Hearth, Inc., a nonprofit organization dedicated to the elimination of homelessness among the elderly through prevention, placement, and housing programs. The project is expected to start construction in winter 2020. In addition, contingent to securing additional funding sources, the City of Newton will support the development of the Haywood House. Haywood House will designate four units for households that have been homeless or are at-risk of homelessness.

Furthermore, as a member community of the BoS CoC, the City and its ESG subrecipients are able to participate in the Coordinated Entry process to assess the housing needs of homeless individuals and to meet those needs through housing placement in available units across the 80-plus member communities in the consortium.

The Waltham Committee, Inc (WCI) provides residential individual, in-home and employment day supports to people with a wide range of intellectual disabilities, helping them to achieve a rich, meaningful life within the community. WCI assists 135 people with housing and employment programs in Waltham. Beaverbrook Step provides residential and housing support services, including 24 hour support services and group living to 150 adults with disabilities.

The Watertown Housing Authority has prioritization for people in a wide variety of situations that informs their waiting list for services and allows for those most in need to receive elevated status.

4. Specify the activities that your community plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

According to projections provided by MAPC, by 2030 Brookline's population could reach 65,951, with significant growth in the age group of seniors 75 years and older. There is a documented need for affordable senior housing and services (as described in the sections above). In response to this demographic trend, local government and many housing agencies, social providers, and community organizations have stepped in with resources, projects and infrastructure to respond to the housing needs of seniors, persons with disabilities and populations with special needs. The Brookline Housing Authority (BHA) has a significant inventory of dwelling units scattered around thirteen federal and state buildings to support seniors, persons with disabilities, and populations with special needs. Many of the buildings provide resident services that help elderly and disabled to continue living in their units. The BHA has 48 apartments that comply with the Americans with Disabilities Act for individuals that use wheelchairs or other mobility aides.

BHA sets aside seven apartments for homeless families as part of the DHCD-funded Transitional Housing Program (THP). Together with their partner agencies, BHA provides transitional housing and extensive support services to homeless families as they work toward self-sufficiency and housing stabilization. Participant families occupy these units for a 9-12 month period while they receive counseling from social workers, connections to resources such as child care, transportation, education/employment opportunities, personal money management training, and more. The Brookline Housing Authority staff partners with other agencies that provide residents and Section 8 Housing Choice Voucher holders living in Brookline with services that help the elderly and disabled continue to live in their apartments; advance the educational boundaries of children and parents and; provide skills and experience for employment, among others services.

Support services are also provided by the Brookline's Council of Aging. This town agency coordinates and provides comprehensive services for Brookline senior residents. Social workers and volunteers provide help with accessing Fuel Assistance, SNAP, AARP tax preparation and information and referral. The Brookline Health Department offers a Substance Abuse Prevention Program for teen issues involving alcohol, drugs and other risky behaviors, and additional treatment resources. The Brookline Community Mental Health Center provides case management and supportive services in-house, and a network of providers and agencies that works with special needs populations.

Concord will utilize HOME funds to support the development of Christopher Heights. This project schedule has occupancy and completion of 83 affordable assisted-living units, including 11 HOME assisted units targeted for Fiscal Year 2022.

Bedford will utilize HOME funds for the rehabilitation project at Ashby Place, an 80 unit public housing development for elderly and disabled residents. Four HOME-assisted units will be part of the project scheduled to be completed in Fiscal Year 2020.

Sudbury will see the completion of Coolidge Phase II in Fiscal Year 2021 with 56 affordable age-restricted units including 11 HOME assisted units.

Framingham will continue to support South Middlesex Opportunity Council's Home Modification Loan program as well as continue to offer the housing rehabilitation program to homeowners, including work to make their homes ADA accessible. The City will also continue to provide Tenant Based Rental Assistance.

Needham is introducing the Small Repair Grant Program that will provide grants of up to \$4,000 to help seniors 60 years of age or older, earning at or below 80% of area median income, make important health and safety improvements to their homes. The Town is also proposing an Accessory Dwelling Unit bylaw that would enable the Board of Appeals to permit these units in single-family homes for occupancy by family members or caregivers of the owner or family who require assistance with activities of daily living. Both initiatives are meant to help older and/or disabled residents remain in their homes and community.

The need for more affordable housing in the City of Newton and the surrounding communities is critical. To address the specific housing and supportive service needs of individuals and families who are not homeless, but have other special needs, the City will continue to build relationships with local and regional service providers and affordable housing developers who have experience in creating and managing housing with supportive services. As the lead community of the WestMetro HOME Consortium, the City will continue to build capacity for HOME Community Housing Development Organizations (CHDO's) working on projects in Newton and the other 12 consortium communities. The City will continue to explore the feasibility of redeveloping the West Newton Armory site into 100% affordable housing, with the potential to include appropriate support services for the residents.

The City of Waltham Health Department employs a social worker/certified addiction counselor full time that coordinates services for residents in need through the Charles River Community Health Center. Waltham allocates \$100,000 annually to the Center for resident services. The Center collaborates with other social service organizations in Waltham to connect patients with a comprehensive range of services and provide continuity of care, while creating new community partnerships to meet the changing needs of patients and the community.

The Waltham Housing Authority provides low-income families, seniors, and people with disabilities the opportunity to live in safe, decent, affordable and accessible housing. The WHA works in partnership with the City of Waltham, the Massachusetts Department of Housing and Community Development, HUD and local community organizations to support and promote the health, welfare and economic independence of WHA residents and to sustain a diverse and productive population in the Waltham community. The City utilizes CDBG funding to improve

the recreational and educational needs of the families with children throughout WHA sites through upgrades to playgrounds and community centers on site at Dana Court, Prospect Terrace and Chesterbrook family housing.

The Waltham Council on Aging provides transportation; case management; information and assistance for in-home services; personal care; chore and homemaker assistance; and legal services. The City of Waltham Health and Police Departments are part of a regional effort to create a resource network for individuals who suffer from addiction and their family and friends. The Metro Boston Project Outreach is a collaboration of health and police departments, emergency personnel, social workers, hospitals and prevention, intervention, treatment and recovery providers from Arlington, Belmont, Lexington, Newton, Waltham, Watertown and Weston who work together to address substance use disorders in the region. The primary mission of MBPO is to connect residents and their families with substance use disorder treatment and support through monthly drop-in resource events.

Watertown will continue to offer support and guidance to those in need through the City's social services coordinator and the housing provided by the Watertown Housing Authority. The City will also continue to make anyone in need aware of the opportunities provided through our Inclusionary Zoning as projects come on line, and any affordable housing produced by any other entities.

MA-40 Barriers to Affordable Housing - 91.410, 91.210(e)

1. Describe any negative effects of public policies on affordable housing and residential investment.

While there are community specific barriers to affordable housing, many of these impediments are experienced Consortium-wide. Regionally, limited developable land increases the cost of affordable housing development, budget cuts to federal and state resources reduce assistance to programs creating and preserving affordable housing, and abutter opposition stymie projects that could yield new affordable housing stock. The Consortium communities detail individual barriers to affordable housing in the paragraphs below.

There are multiple barriers to affordable housing in Brookline, which are underlined by the decreasing funding levels of federal and state resources to support the production and preservation of new and existing affordable housing. If a consistent, predictable funding stream were increased, the Town could better meet its housing needs. High off-street parking requirements for new residential developments, disallowance of accessory dwelling units, and a lack of land zoned for multi-family housing (71% of land in Brookline is not zoned for multi-family) all create regulatory barriers to affordable housing.

In the towns of Bedford, Concord, Lexington, Sudbury and Wayland it is cost-prohibitive to create affordable housing. Available land for development of housing is limited and expensive. Most communities have predominantly single-family zoning with minimum lot sizes of one acre and almost no zoning provision for multi-family units. This type of development is only permitted through special permits or MGL Chapter 40B, which is complicated and time consuming and there is frequently neighborhood opposition to proposed developments. This opposition may be due to specific project factors, such as style, size and location, and this lack of support has hindered the creation of diverse types of units, both affordable and market rate.

Framingham's zoning bylaws currently limit the area where multi-family housing can be constructed. Diminished funding to support transportation alternatives further limits housing development that is accessible to employment centers and transportation options. The City does not allow accessory dwelling units to be constructed, which could provide a low-cost housing option. The City has recently made strides to jump start multi-family housing development. The central business district was redefined to include multi-family housing and transit orientated development. In 2013, the City amended its zoning bylaw to allow for cluster housing, multifamily housing, in addition to alternatives to the single-family house.

Natick, like many communities, has zoning bylaws that do not encourage higher density multi-family housing. There are a number of areas, primarily in Natick Center, that identify affordable housing as an alternative use and provide incentives for developers to build affordable housing

as part of a development, but these measures are limited and additional attempts to amend zoning have not passed. Most zoning in Natick has a minimum lot size requirement of at least 12,000 square feet.

The high quality of Needham's school system and proximity to public transportation drive up the Town's high property values, making it more difficult for low- and moderate-income households to enter the community. These high housing costs are also spurring the demolition of older, smaller and more affordable housing units in the private housing market with the replacement of significantly larger and more expensive homes that result in very little net growth in the housing stock. While the Town has enacted zoning that has promoted greater housing diversity and affordability over the past few years, there still remains room for regulatory improvements to better direct development to appropriate locations based on "smart growth" principles and with incentives for incorporating public benefits, including affordable housing.

The City of Newton's Zoning Ordinance and its Special Permit process are two public policies that have the most notable negative effect on affordable housing development and residential investment throughout the City. The restrictive zoning ordinance impedes the development of multifamily projects that could include mixed-income and affordable units - the type of units most needed in the City. Furthermore, the special permit process is equally long and uncertain for developers, which can discourage developers from pursuing housing projects in the City. These policies contribute to the shortage of affordable housing by slowing the speed at which housing projects could be approved, constructed, and occupied.

The largest barrier to affordable housing in Waltham is the constant increase in housing costs. While there are public policies to create affordable housing and incentivize affordable housing, a majority of Waltham residents are unable to afford their current housing situation. Funding constraints hinder the City's ability to keep up with subsidizing housing in order to help families remain in their homes and avoid homelessness.

In Watertown, the lack of regulations for short term rentals enabled this industry to consume a significant amount of rental housing stock, thereby making affordable units less prevalent and less affordable. The Town does not currently allow Accessory Dwelling Units, however discussions have begun about the possibility of amending zoning regulations to allow this type of housing in certain situations.

MA-45 Non-Housing Community Development Assets - 91.410, 91.210(f)

1. Introduction

Economic Development Market Analysis

This section provides an overview of the local economy and economic development initiatives in the City of Newton.

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	44	n/a	0	n/a	n/a
Arts, Entertainment, Accommodations	3,291	n/a	9	n/a	n/a
Construction	718	n/a	2	n/a	n/a
Education and Health Care Services	11,532	n/a	31	n/a	n/a
Finance, Insurance, and Real Estate	3,628	n/a	10	n/a	n/a
Information	1,679	n/a	5	n/a	n/a
Manufacturing	1,415	n/a	4	n/a	n/a
Other Services	1,410	n/a	4	n/a	n/a
Professional, Scientific, Management Services	6,888	n/a	19	n/a	n/a
Public Administration	0	n/a	0	n/a	n/a
Retail Trade	2,755	n/a	8	n/a	n/a
Transportation and Warehousing	420	n/a	1	n/a	n/a
Wholesale Trade	1,128	n/a	3	n/a	n/a
Total	34,908	n/a	--	n/a	n/a

HUD Table 32 - Business Activity

Data 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)

Source:

2. Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

Several main industries accounted for the larger shares of employees within Newton. Education and Health Care Services represents 31% of employees, while Professional, Scientific, and Management Services make up approximately 19% of employees in Newton. Finance, Insurance and Real Estate represent a 10% share of the workers, followed by Arts, Entertainment and Accommodations at 9%, and Retail Trade at 8%.

3. Describe the workforce and infrastructure needs of the business community:

Newton is home to a well-educated and high-earning workforce, suited for highly-skilled positions requiring the completion of advanced education. The Newton workforce's key characteristics are reflected in the City's dominant industries, like education, health care, and finance. As a result of the high level of educational attainment of Newton's residents, the

majority of the workforce recorded a commensurately high level of median earnings, according to the 2013-2017 ACS data (Table B20004). Median earnings for those with a Bachelor's degree were over \$74,000 for the past twelve months, while those with a graduate or professional degree had a median income of over \$101,000 for the past twelve months.

According to the American Community Survey's 2013-2017 5-Year Estimates, Newton's unemployment rate is 3.7%. However, those residents of Newton who have completed high school or less have higher unemployment rates than those with some college, an Associate's, a Bachelor's, or post-graduate degree. While the majority of the workforce is well suited for the highly-paid, high-skill jobs, this smaller sector of the population may have more difficulty finding employment to support themselves and their families. These workers, with a lower-level of educational attainment, may be more likely to be the beneficiaries of CDBG-funded programs and services.

- 4. Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.**

Over the past few years, the City of Newton has undertaken a new economic development initiative in coordination with the Town of Needham. The project, titled the N² Corridor Economic Initiative, aims to attract the high tech/innovation sector along I-95 in Newton and Needham. This project is a public-private collaboration between the Newton-Needham Chamber of Commerce, its member businesses, and the respective City and Town governments. The development of the initiative is overseen by the N² Corridor Task Force, which includes business owners, property owners, economic development experts, and non-profit organizations among its members. This task force is responsible for strategic planning, marketing, networking, education, advocacy, and technical assistance. The project intends to support the formation and development of growing start-up companies, providing an alternative to the congestion and cost of other innovation hubs like Kendall Square, in Cambridge, MA, and downtown Boston's Seaport District. In time, this initiative will encourage private investment, increase the number of highly-paid, high-skilled jobs, and enhance the competitiveness of the local economy. In addition, this initiative will create new support and service jobs for low- and moderate-income workers. Ideally, the existing workforce in the Newton and Needham jurisdictions, as well as surrounding areas, will be well-matched in terms of educational and skill attainment for the new jobs created within the N² Corridor.

- 5. How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?**

Please see description of workforce above.

- 6. Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.**

Currently, the City does not undertake any workforce training initiatives or coordinate with a Workforce Investment Board. Improved access to job training was identified as a need among Newton's low-income residents during the Consolidated Planning process.

- 7. Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?**

Not applicable.

- 8. If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.**

Not applicable. Please see description of local/regional N2 initiative above.

MA-50 Needs and Market Analysis Discussion

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

Housing problems, as defined below, can constrain a household from having basic housing necessities, such as a functional bathroom or kitchen, cause health and sanitary issues due to overcrowding, and create economic burdens. This data provides insight into the need to provide decent, safe, sanitary and affordable housing.

The four housing problems are:

- 1.) Lacks complete kitchen facilities,
- 2.) Lacks complete plumbing facilities,
- 3.) More than one person per room,
- 4.) Cost Burden greater than 30%

Framingham, like many other urban areas in America, has areas with concentrations of housing problems. The area with the most housing problems is the South Side neighborhood. Framingham has traditionally defined areas of concentration of low and moderate-income populations for the purposes of meeting CDBG low/mod income area benefit requirements as census blocks where 51% or more of people are low and moderate income.

In Newton, housing problems in general are a common issue, as a quarter of Newton homeowners and approximately 45% of Newton renters face at least one housing problem. Approximately 31% of all Newton households meet the definition of being cost burdened. Renters are generally more cost burdened than homeowners in Newton, and renter households with incomes at or below 50% AMI are the most likely to experience this problem. More specifically, it is elderly (62 years or older) and small family renter households (4 or less individuals) who face this problem most prevalently. For example, of the total number of low- to moderate-income renter households in the City that are housing cost burdened, 34% are elderly households, and 39% are small family households. This trend continues with elderly homeowners. Of the total number of low- to moderate-income owner households in the City that are housing cost burned, 62% are elderly households. It does not appear that these households are concentrated in any particular area of the City but are spread throughout the jurisdiction.

Cost burden is the most prevalent housing problem in Waltham. Of the 23,722 occupied housing units in the city, 67% of these households earn 75,000 or less and pay more than 30% of the household income towards housing expenses. Seventy-six percent of the homes were built prior to 1979 with 32% of those being built before 1939. The Southern neighborhood area is Waltham's CDBG target area with the highest concentration of low income, renter households (over 51%). This area also has the highest number of older, multi-unit properties. When these older homes sell they are often developed into new condominiums, which results

in higher rents and higher sale prices. The development of new housing units in the CDBG target area is making the area even less affordable to existing residents.

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

Framingham has traditionally defined areas of concentration of low and moderate-income populations for the purposes of meeting CDBG low/mod income area benefit requirements as census blocks where 51% or more of people are low and moderate income. These neighborhoods with concentrations of housing problems also have higher concentrations of unemployment, minority residents, and poverty. These neighborhoods include: the Pelham Apartments, Pulsan Road, Arlington Street and Gordon Street Neighborhoods.

The City of Newton does not have any areas where racial or ethnic minorities are concentrated, nor are there any racially and ethnically concentrated areas of poverty (where a census tract must have a non-white population of 50% or more and 40% or more of the population is living at or below the poverty line). Data indicates Newton has one census tract (3741) with a disproportionate percentage of non-white households living in poverty compared to non-Hispanic white counterparts. Of the households living in census tract 3741, 23% are Asian households and 11% of those households are living at or below the poverty line.

The Waltham census tracts with minority concentrations are largely located in the southern portion of the City south of Main Street.

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

In Framingham, neighborhoods with a concentration of lower income families traditionally experience the greatest economic distress. Principal market characteristics of these areas are very low incomes, predominantly non-owner occupied units, high rent burdens, poor building maintenance and structural conditions, and high rates of crowding. Low incomes and high rent burdens make it difficult for renters in these market areas to improve their housing conditions.

The Southern neighborhood area is Waltham's CDBG target area with the highest concentration of low income, renter households. This area also has the highest number of older, multi-unit properties. When these older homes sell they are being developed into new condominiums, which results in higher rents and higher sale prices. The development of new housing units in the CDBG target area is making the area even less affordable to existing residents.

Zoned primarily residential, the "Southern Neighborhood District" contains a small businesses, fast food restaurants and office parks which suit the 7,199 residents in the neighborhood. There are 4,605 families in the "district". The neighborhood has a small playground that is easily accessible by residents from Moody Street. Renters make up a majority of the housing units in the district. Waltham is built out in many areas and south of Main Street neighborhoods are lined with one- and two-family houses. There are relatively few large undeveloped lots.

4. Are there any community assets in these areas/neighborhoods?

Framingham neighborhoods have a variety of community assets such as affordable daycares, playgrounds and parks, public facilities and public housing. These neighborhoods are also very close to downtown and provides easy access to a number of community-wide assets.

The census tracts with minority concentrations are largely located in the southern portion of the City of Waltham south of Main Street. This area of Waltham has several city parks, a museum, a community center along with a public elementary school. Other city services in this area of Waltham include City Hall, and a fire station. The area is accessible from Boston and points northwest by commuter rail.

5. Are there other strategic opportunities in any of these areas?

Brownfield remediation funds can be used to remediate the environmental issues in south Framingham. These sites can also be used to redevelopment. The City of Framingham is actively looking for Transit Oriented Development opportunities. Parts of South Framingham are classified as opportunity zones. The MWRTA hub is located within South Framingham.

MA-60 Broadband Needs of Housing Occupied by Low- and Moderate-Income Households

- 1. Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.**

In Newton and throughout the WestMetro HOME Consortium, access to broadband service in household units occupied by low- and moderate-income households was not identified as a priority need. While in-home access did not surface as an issue, the costs associated with the service were discussed as being an additional challenge for low- and moderate-income households. Some communities discussed the idea of including the cost of broadband service in the utility allowance requirement for many deed-restricted affordable units.

- 2. Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.**

There is no need for increased competition in the WestMetro HOME Consortium communities, based on consultations conducted by Consortium staff.

MA-65 Hazard Mitigation

1. Describe the jurisdiction's increased natural hazard risks associated with climate change.

Hurricanes and other wind storms, which are most common natural hazards experienced in the Northeast, have the potential to cause flooding, damage homes, sever power, and temporarily isolate residents. According to the Massachusetts Department of Public Health, the State is most predominantly effected by climate change through hotter summers, rising sea levels, more frequent severe weather, and inland flooding. These weather patterns are predicted to degrade weather quality and compromise the infrastructure of buildings.

2. Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

The State of Massachusetts and in turn the WestMetro HOME Consortium is most predominantly effected by climate change through hotter summers, rising sea levels, more frequent severe weather, and inland flooding. Affordable housing built and occupied by lower income populations is not situated in areas, such as floodplains, that would disproportionately affect these structures in comparison to the general population. However, vulnerable populations in the Consortium and the region, including lower-income households and non-homelessness special needs individuals, experience weather impacts associated with climate change even more negatively than the population at large because of their limited resources.

STRATEGIC PLAN

SP-05 Overview

Strategic Plan Overview:

The Needs Assessment and Market Analysis set the stage for the development of “The Strategic Plan” section of the Consolidated Plan, which outlines overarching goals, priorities, and actionable steps to be undertaken by the City of Newton and WestMetro HOME Consortium over the next five years.

Annually, the City of Newton receives Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG) funds from the U.S. Department of Housing and Urban Development (HUD). HOME funds are received on behalf of the WestMetro HOME Consortium (Consortium). While each of these programs is unique, the overarching purpose of the three programs is to support low- to moderate-income individuals and families, as well as individuals and families who are homeless or at-risk of homelessness, through the creation and rehabilitation of affordable housing, direct financial assistance to renters and homebuyers, the provision of supportive and human services, financial support for emergency shelter operations, and the expansion of economic opportunities.

Based on the priorities and needs identified in the FY21-25 Consolidated Plan, the City of Newton plans to allocate its CDBG funds over the next five years into four general categories:

- **Affordable Housing**
To create, preserve, and rehabilitate safe, decent, and affordable rental and ownership housing and provide financial support to income-eligible first-time homebuyers.
- **Human Services**
Financial support for programs that directly provide stability across the lifespan for Newton’s low- to moderate-income population.
- **Architectural Access**
Removal of material and architectural barriers restricting mobility and accessibility of elderly or severely disabled persons, through public thoroughfares, public buildings, parks and recreational facilities, and nonprofit agencies.
- **Program Administration**
HUD caps the program administration allocation at 20 percent of the City’s total annual CDBG grant, to support staff salaries and other operational expenses related to administering this important program.

In addition to the categories mentioned above, Fair Housing will continue to be a focus for the City of Newton and WestMetro HOME Consortium over the next five years. Continued education around fair housing laws, regulations and their enforcement are critical to ensure

every person has equal opportunity and access to affordable housing in Newton. In FY21, the Consortium will finalize its updated Analysis of Impediments to Fair Housing report and will begin to implement recommended actions.

The WestMetro HOME Consortium, led by the City of Newton, anticipates receiving approximately 7.4 million dollars over the next five years (FY21-25). These funds will be used to address the regional housing problem of cost burden (the instance of households spending greater than 30% of their income on housing costs), through preservation and production of rental housing; rental assistance programs; and rehabilitation of existing housing. HOME projects that include the rehabilitation and modernization of housing authority units, particularly in Brookline, Needham, and Waltham, will be undertaken throughout the period covered by the Consolidated Plan.

In the Consortium, there are approximately 5,507 public housing units, 4,420 of which are suitable for people with disabilities. In most communities there is a long wait list for these units. Housing authorities make all possible reasonable accommodations that are requested by applicants and tenants, and continue to explore ways to expand their portfolio of accessible housing. Opportunities for overall public housing resident input take place through tenant associations and resident advisory boards.

The housing stock in the Consortium is predominantly older, and 80% of units were built prior to 1980. These homes have the potential to contain lead paint, which was not banned until 1978. Framingham, Newton, and Waltham administer federally funded income-eligible homeowner rehabilitation programs, which address the remediation of lead and other hazards. Other Consortium communities refer residents to MassHousing's Get the Lead Out program, which offers deferred or low-interest loans for lead remediation.

One of the priorities of the Housing and Community Development program is to fund programs and services for poverty-level individuals and families. A strong network of providers dedicated to treating and preventing homelessness is an important component of this effort. The City of Newton's ESG program provides funding to nonprofit organizations: to support emergency shelters and transitional shelters for homeless individuals and families; to prevent individuals and families from becoming homeless; and to rapidly re-house homeless individuals and families and move them towards independent living.

Zoning limitations on accessory dwelling units, multi-family housing, and large minimum lot sizes are some of the regulatory barriers that impede the construction of affordable housing in Consortium communities. The high cost of development coupled with reductions in federal and state resources also make efforts to increase housing stock for lower income populations challenging. Throughout FY21-25, towns and cities in the Consortium will encourage local affordable housing initiatives through zoning changes and the adoption or enforcement of inclusionary zoning provisions. Local funding streams, including Community Preservation Act funds and Housing Trust funds will assist in overcoming the high cost of development.

Strategic Plan

SP-10 Geographic Priorities – 91.215 (a)(1)

1. Geographic Area Priority Areas

HOME funds are allocated community-wide throughout the WestMetro HOME Consortium. City of Newton CDBG funds are allocated city-wide.

2. Describe the basis for allocating investments geographically within the jurisdiction:

HOME funds are allocated community-wide throughout the WestMetro HOME Consortium. City of Newton CDBG funds are allocated city-wide.

SP-25 Priority Needs - 91.215(a)(2)

1. Identify priority needs:

Please see [SP-25: Strategic Goals Table](#)

2. Narrative description of priority needs:

Kicking off in the Spring of 2019, staff from the City of Newton's Housing and Community Development Division of the Planning and Development Department (staff) consulted with a number of community leaders, elected officials, board and committee members, staff from other city departments, representatives from state agencies, and housing and social service providers to identify Newton's most pressing needs as they relate to low- and moderate-income individuals and families living in Newton.

The Division's consultations with service providers and experts involved needs assessment sessions with other City departments and City boards and commissions, such as Health and Human Services, Economic Development, Conservation, Public Works, Senior Services, Engineering, Parks and Recreation, Transportation, the Commission on Disability, the Fair Housing Committee, and the Newton Housing Partnership; brown bag lunches / discussions with our Human Service and ESG subrecipients; focused meetings and phone calls with other agencies and individuals including Continuum of Care partners at the Balance of State (DHCD); and three Community Needs Assessment Meetings open to the public in late September / early October 2019. Additionally, Division staff relied upon the data, analysis, and projections of a variety of federal, state, local departments and agencies, as well as regional organizations and educational institutions.

Simultaneously, staff from the HOME Consortium communities consulted with local housing providers, nonprofits, social services agencies, broadband companies and municipal departments to assess housing needs and develop programs, policies, and projects to address these needs. In some instances, these consultations forged new long-term connections and partnerships that will continue beyond the Consolidated Planning process. Participation by formalized groups that had been previously established to enhance coordination between providers, policymakers, advocates, and other entities, reinforced the ongoing effectiveness of this approach.

Not surprisingly, affordable rental housing surfaced as the most pressing need in Newton and throughout the WestMetro HOME Consortium. However, other critical needs beyond affordable housing were identified in Newton, including:

- **Supportive Services for Homeless and At-Risk of Homeless**
The need to provide supportive services for individuals and families that are homeless or at-risk of homelessness, including financial support for existing emergency and transitional housing.

- Human Services / Public Services
The need to provide financial support for programs that directly benefit low- and moderate-income youth, families, seniors, and persons with disabilities.
- Architectural Access
The need to remove architectural barriers and increase access and mobility throughout the City to public thoroughfares, public buildings, parks and recreational facilities.
- Fair Housing
The need to increase the understanding of fair housing laws and regulations and their enforcement.

The high cost of homeownership and rental housing in the WestMetro HOME Consortium is considerably more problematic for households with incomes under 80% of the Area Median Income. These lower income households are often using more than 30%, or even greater than 50% of their income towards housing expenses. Long wait times for public housing and subsidized housing units mean that relief is only available to a small portion of the households experiencing these burdens. These factors lead to instability and increased homelessness for lower income populations, especially individuals with special needs. The priority needs throughout Consortium include: the creation of affordable rental housing, preservation and rehabilitation of affordable housing, particularly housing authority units; tenant based rental assistance for homeless and low-income households, and health and safety related housing rehabilitation for income eligible homeowners.

SP: 25 Priority Needs for the City of Newton and the WestMetro HOME Consortium

Community	Sort Order	Name	Priority Level (must select one)	Description	Income Level	Family Types	Homeless	Non-homeless Special Needs	Describe Basis for Priority
Newton	1	Affordable housing, production of new units	High	Create affordable rental and ownership housing near amenities, village centers, and public transportation options to promote housing equality and economic and demographic diversity. Support older adults to allow them to remain in Newton as they age.	Extremely low, low, moderate	All	Chronic homelessness, Individuals, families with children, mentally ill, chronic substance abuse, veterans, victims of domestic violence, unaccompanied youth	Elderly, frail elderly, persons with mental disabilities, physical disabilities, development disabilities, persons with alcohol or other addictions, persons with HIV/AIDS and their families, victims of domestic violence	A gap between the number of low-and moderate income households and the number of available affordable units in the Newton was identified in the needs assessment, specifically units affordable to households at and below 50%AMI are in great need.
Newton	2	Affordable housing, rehab of existing units	High	Continued need for the housing rehab program for income-eligible residents, including improvements for accessibility and safety, especially for seniors to encourage aging in place.	Extremely low, low, moderate	All	Chronic homelessness, Individuals, families with children, mentally ill, chronic substance abuse, veterans, victims of domestic violence, unaccompanied youth	Elderly, frail elderly, persons with mental disabilities, physical disabilities, development disabilities, persons with alcohol or other addictions, persons with HIV/AIDS and their families, victims of domestic violence	Newton's ownership and rental housing stock are aging and are in need of capital improvements and safety.
Newton	3	Affordable housing, acquisition of existing units	High	Ensure continued affordability of deed-restricted units to support successful tenancies of low-to moderate-income residents in Newton.	Extremely low, low, moderate	All	Chronic homelessness, Individuals, families with children, mentally ill, chronic substance abuse, veterans, victims of domestic violence, unaccompanied youth	Elderly, frail elderly, persons with mental disabilities, physical disabilities, development disabilities, persons with alcohol or other addictions, persons with HIV/AIDS and their families, victims of domestic violence	The need is to ensure existing rental and ownership affordable units remain affordable in perpetuity.
Newton	4	Fair Housing	High	Need for fair housing education, enforcement, and obligations	All	All	All	All	The need is to increase the understanding of fair housing laws and regulations and their enforcement.
Newton	5	Homelessness, emergency shelter/transitional housing	High	Continued support of existing emergency and transitional housing for homeless and at-risk of homeless individuals and households.	Extremely low, low	All	Chronic homelessness, Individuals, families with children, mentally ill, chronic substance abuse, veterans, victims of domestic violence, unaccompanied youth	Elderly, frail elderly, persons with mental disabilities, physical disabilities, development disabilities, persons with alcohol or other addictions, persons with HIV/AIDS and their families, victims of domestic violence	Point-in-Time data indicates a majority of the homeless population was housed through emergency shelter and transitional housing programs. Continued support of these programs will stabilize individuals and families, who would otherwise be unsheltered, and move them out of homelessness.
Newton	6	Homelessness, prevention	High	Need for supportive services for individuals and families that are at-risk of homelessness.	Extremely low	All	Chronic homelessness, Individuals, families with children, mentally ill, chronic substance abuse, veterans, victims of domestic violence, unaccompanied youth	Elderly, frail elderly, persons with mental disabilities, physical disabilities, development disabilities, persons with alcohol or other addictions, persons with HIV/AIDS and their families, victims of domestic violence	The most vulnerable populations that are at risk of homelessness have limited resources and face significant barriers in maintaining housing.
Newton	7	Homelessness, rapid re-housing	High	Need for supportive services for individuals and families that are homeless, including the transition from homelessness to permanent housing.	Extremely low	All	Chronic homelessness, Individuals, families with children, mentally ill, chronic substance abuse, veterans, victims of domestic violence, unaccompanied youth	Elderly, frail elderly, persons with mental disabilities, physical disabilities, development disabilities, persons with alcohol or other addictions, persons with HIV/AIDS and their families, victims of domestic violence	The most vulnerable populations that are homeless have limited resources and face significant barriers to move into permanent housing.
Newton	8	Non-Housing Community Development, public services	High	Financial support for programs that directly benefit low- and moderate-income youth, families, seniors, and persons with disabilities.	Extremely low, low, moderate	All	N/A	Elderly, frail elderly, persons with mental disabilities, physical disabilities, development disabilities, persons with alcohol or other addictions, persons with HIV/AIDS and their families, victims of domestic violence	Data indicates low- and moderate-income residents of Newton require services and interventions to move them towards stability across the lifespan.
Newton	9	Architectural Access	High	Remove architectural barriers and increase access and mobility throughout the City to public thoroughfares, public buildings, parks and recreational facilities.	All	All	N/A	Elderly, frail elderly, persons with mental disabilities, physical disabilities, development disabilities, non-housing community development	Architectural barriers exist in the built environment, which limit the mobility and accessibility for persons with disabilities.
HOME Consortium	10	Tenant Based Rental Assistance	High	Financial assistance to residents to secure housing	Extremely-low, low-, moderate	Families, Families with Children, Elderly, Public Housing Residents	Chronic Homeless; Individuals; Families with Children; Mentally Ill; Chronic substance Abuse; Veterans; Victims of Domestic Violence, Unaccompanied Youth	Elderly; Frail elderly; Persons with Mental Disabilities; Persons with Physical Disabilities; Persons with Alcohol or other Addictions; Victims of Domestic Violence	Address the immediate and acute housing need of the most vulnerable populations in the city that are at highest risk of experiencing homelessness.
HOME Consortium	11	Housing Rehabilitation	High	Rehabilitation to preserve and create affordable housing	Extremely-low, low-, moderate	Families, Families with Children, Elderly, Public Housing Residents	N/A	Elderly; Frail elderly; Persons with Mental Disabilities; Persons with Physical Disabilities; Persons with Alcohol or other Addictions; Victims of Domestic Violence	The Consortium's aging housing stock is costly to repair and maintain and often lower-income households are unable to address health and safety repairs. Funding limitations have caused the capital needs of housing authorities throughout the region to go unaddressed, in turn driving up operating costs. Rehabilitation to create affordable housing is identified as the most cost effective strategy in many Consortium communities, where developable land is limited.
HOME Consortium	12	Production of Rental Units	High	Acquisition or construction of affordable rental units	Extremely-low, low-, moderate	Families, Families with Children, Elderly, Public Housing Residents	Chronic Homeless; Individuals; Families with Children; Mentally Ill; Chronic substance Abuse; Veterans; Victims of Domestic Violence, Unaccompanied Youth	Elderly; Frail elderly; Persons with Mental Disabilities; Persons with Physical Disabilities; Persons with Alcohol or other Addictions; Victims of Domestic Violence	A gap between the number of low-and moderate income households and the number of available affordable units in the Consortium was identified in the needs assessment

SP-30 Influence of Market Conditions – 91.215 (b)

1. Please complete the table below.

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	Bedford, Framingham, Natick, Waltham, and Wayland will continue to operate HOME-funded Tenant Based Rental Assistance programs during FY21-25. The upfront costs required to access affordable rental housing in these communities present a barrier for many lower income households. Rising rents caused by market demands and an inelastic housing supply across the region has boosted security deposit fees and first/last month rent, which continue to increase the number of households in need of rental assistance.
TBRA for Non-Homeless Special Needs	Waltham will continue to operate a HOME-funded Tenant Based Rental Assistance that specifically assists near homeless families and very low-income, at-risk elderly households who are on the Waltham Housing Authority’s wait list. The wait time for these households can be up to three years. The Needs Assessment and Market Analysis indicate that elderly households, which account for approximately half of the population that has a disability, are the most cost burdened household type Consortium-wide. The temporary rental assistance provided through Waltham’s TBRA program safely bridges these households into public housing.
New Unit Production	The need for more affordable housing production in the Consortium, as with the Greater Boston region, is severe and growing. High real estate prices make it difficult for low and moderate income households to enter or stay in the community, and current market rents put many lower income households in a state of housing cost burden. There are over 5,507 PHA units in the Consortium, yet housing authorities maintain long waitlists, which include wait times ranging from three to 12 years. Other affordable rental units, such as those created through inclusionary zoning and a variety of funding mechanisms, also have significant wait lists. High priced real estate and construction costs mean that HOME funds will be vital resource to increase the production of affordable housing in the Consortium.

HUD Table 33 – Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Rehabilitation	<p>Preservation of affordable housing stock is a high priority, Consortium-wide. Brookline, Bedford, Concord, Needham, Newton, Lexington, and Waltham will use HOME funds during FY21-25, to rehabilitate public housing units. Public housing authorities are a significant source of affordable housing in these communities and traditional state and federal public housing funding has fallen short of meeting capital needs. The strain from outdated building systems has driven up operating costs for these public housing authorities. HOME funding will be used to support efforts by the local housing authorities to address deferred capital repair necessary to maintain properties in a safe and sanitary condition. Brookline notes that most Brookline Housing Authority’s (BHA) properties face multi-million dollar capital repair deficits. Throughout the BHA’s portfolio, plumbing and mechanical systems are beyond their typical useful life, energy use is inefficient, roofs and windows require improvement, and there is an urgent need for new emergency generators and apartment interior upgrades.</p> <p>The City of Framingham will operate a HOME-funded rehabilitation program for income-eligible homeowners to address safety repairs, hazard abatement and the removal of architectural access barriers. Slightly over 80% of the City’s housing stock was built in 1979 or earlier, and these older homes are often costly to repair and maintain. In Framingham, 26% of all homeowners are cost-burdened, and elderly individuals and families experience this housing problem more than other household types. The <i>Massachusetts State Plan on Aging, 2018-2021</i> reports that the State’s older population (65+) has the second lowest level of economic security in the nation. Many Massachusetts elderly cannot cover basic and necessary living expenses, while aging in their homes, without additional financial assistance.</p>
Acquisition, including preservation	<p>Acquiring and preserving available affordable housing opportunity is a critical component of the Consortium’s strategy to address the lack of existing housing stock to meet the needs of very low income, low income, and moderate income households. The majority of households in the MetroWest Consortium cannot afford to purchase a single family home or condominium in their community. These families and individuals must rent for the long term, placing demand on the region’s rental real estate market and in turn driving up rents, which continue to escalate. Acquisition and rehabilitation is identified as the most cost effective strategy in some Consortium communities, where developable land is limited and single family houses, multi-family units, or institutional buildings like schools, churches, and hospitals can be renovated and reused for affordable housing.</p>

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

1. Introduction

The City of Newton anticipates receiving approximately \$3,462,000 in CDBG, HOME and ESG funds, plus an additional \$300,000 in program income, during the period covered by the Consolidated Plan (FY21-25). Investments will be targeted to the goals identified in the strategic portion of the Consolidated Plan, including the development and preservation of affordable housing, homelessness assistance and prevention, fair housing, human services, architectural access and program administration. To maximize the impact of these HUD entitlement funds, the city strategically leverages additional funds and partnerships whenever possible.

2. Anticipated Resources:

Please see [SP-35 Anticipated Resources Table](#).

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

Subrecipients of the ESG program are required to provide a dollar-for-dollar match for every ESG dollar spent. To meet this requirement, subrecipients must identify eligible sources of matching funds as part of their ESG RFP response. In FY19 (FFY18), the ESG program exceeded its requirement and leveraged approximately \$1.6 million in matching funds with a combination of state and private funds.

Furthermore, while the public services program does not have a matching requirement, in FY19 (FFY18), the program leveraged approximately \$16 million from private foundations, organizational fundraising, state agencies, the City, and program fees. Sources of leveraged funds include, but are not limited to: The Perpetual Benevolent Fund, The Rebecca Pomroy Foundation, The Foundation for Racial, Ethnic, and Religious Harmony, The Lawrence J. and Anne Rubenstein Charitable Foundation, Newton-Wellesley Hospital Foundation, Massachusetts Department of Children and Families, Massachusetts Department of Developmental Services, and Office of Victim Assistance.

In addition, as required by HUD, participating jurisdictions must match no less than 25 cents for every HOME dollar spent on affordable housing. In FY19, the WestMetro HOME Consortium (Consortium) provided a match contribution of \$54 million, exceeding its fiscal year requirement of \$255,770. The excess match will be carried over to FY20 and beyond. Common forms of match include cash, foregone taxes, fees, Housing Innovations funds, Housing Stabilization funds, Massachusetts Rental Voucher program funds, Low Income Housing Tax Credits, local Community Preservation Act funds, and Housing Trust funds (in some member communities).

According to HUD's most recent HOME Program Performance SNAPSHOT, dated September 30, 2019, the Consortium is among the top participating jurisdictions in the state in leveraging HOME dollars, with \$14.18 raised for every HOME dollar spent.

Overall, Newton's affordable housing strategies outlined in this Consolidated Plan are aimed at leveraging private, state and local resources. For example, the continued production of affordable housing for low- to moderate-income households will likely require additional investment above what the City is able to provide. The Newton Housing Authority's Haywood House is a strong example of a project that will leverage local CDBG dollars with Low-Income Housing Tax Credit (LIHTC) and Newton Community Preservation Act funds, among other funding sources.

4. If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan:

In FY18 (FFY17), the City of Newton released a Request for Proposals for the development of an underutilized, municipally-owned site located at 160R Stanton Avenue. 2Life Communities, formerly known as Jewish Community Housing for the Elderly, was selected as the developer to expand their existing Golda Meir House at 160 Stanton Avenue and to develop nine units of permanent supportive housing for chronically homeless adults with disabilities. To successfully provide permanent supportive housing, 2Life Communities has partnered with Hearth, Inc., a nonprofit organization dedicated to the elimination of homelessness among the elderly through prevention, placement, and housing programs. This project is awaiting an award of LIHTC and other state funds and is expected to start construction in the winter of 2020.

In addition, the City of Newton will be supporting the development of the Haywood House. Haywood House will be constructed on underutilized land owned by the Newton Housing Authority and will consist of fifty-five (55) one-bedroom rental apartments, of which thirty-two (32) units will be affordable to elderly households at or below 60% AMI. Four units will be designated for households that are homeless or are at-risk of homelessness.

Lastly, the City of Newton will continue to explore the West Newton Armory site on Washington Street for the purposes of redeveloping the property as 100% affordable housing, possibly coupled with supportive services. The City Council has begun its Real Property Reuse Process to determine the ultimate use of the site, should the City purchase the property from the Commonwealth. Most recently, the City of Newton was awarded a \$200,000 Housing Choice Grant from the Department of Housing & Community Development (DHCD) to conduct a predevelopment feasibility study on the site, which was formerly operated by the National Guard and has since been vacant for over ten years.

Consortium

In Brookline there is a proposed project to develop senior affordable housing above the Kent/Station Municipal Parking Lot. This parcel was identified in the Town's Housing Production Plan as appropriate for this type of use.

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

The Wayland Housing Trust currently owns a parcel of land where the Town would like to construct one unit of low-moderate income rental housing. The project will be partially funded by local HOME funds.

The Waltham Fernald property on Trapelo Road, Woerd landfill, and Fitch Elementary school all have redevelopment potential for affordable housing during the time period covered by the Consolidated Plan.

AP: 35 Anticipated Resources for the City of Newton and the WestMetro HOME Consortium

Source of Funds	Source	Uses of Funds	Expected Amount Available Year 1		Expected Amount Available Remainder of Con Plan	Narrative Description
CDBG	Public - Federal	Acquisition, Admin & Planning, Economic Development, Housing, Public Improvements, Public Services	Annual allocation (\$):	\$ 1,931,323.00	\$ 7,725,292.00	See Strategic Plan Narrative.
			Program Income (\$):	\$ 100,000.00	\$ 400,000.00	
			Prior Year Resources (\$):	\$ 46,882.33		
			Total (\$):	\$ 2,078,205.33	\$ 8,125,292.00	
HOME	Public - Federal	Acquisition, Homebuyer Assistance, Homeowner Rehab, Multifamily rental new construction, Multifamily rental rehab, New construction for ownership, TBRA	Annual allocation (\$):	\$ 1,480,032.00	\$ 5,920,128.00	See Strategic Plan Narrative.
			Program Income (\$):	\$ 350,000.00	\$ 1,400,000.00	
			Prior Year Resources (\$):	\$ 2,922,716.79		
			Total (\$):	\$ 4,752,748.79	\$ 7,320,128.00	
ESG	Public - Federal	Conversion and rehab for transitional housing, Financial assistance, Overnight shelter, Rapid re-housing (rental assistance), Rental assistance, Services, Transitional housing	Annual allocation (\$):	\$ 167,734.00	\$ 670,936.00	See Strategic Plan Narrative.
			Program Income (\$):	\$ -		
			Prior Year Resources (\$):	\$ -		
			Total (\$):	\$ 167,734.00	\$ 670,936.00	
Community Preservation Act	Public-Local	Housing, Homebuyer Assistance, Multifamily rental new construction, Multifamily rental rehab, New construction for ownership	Annual allocation (\$):	\$ 3,200,000.00	\$ 12,800,000.00	Expected allocation of Community Preservation Act funds for open space, community housing and historic preservation for FY21 (FFY20); 10% of allocation reserved for housing.
			Program Income (\$):	\$ -		
			Prior Year Resources (\$):	\$ -		
			Total (\$):	\$ 3,200,000.00		
Inclusionary Zoning Fund	Public-Local	Housing, Homebuyer Assistance, Multifamily rental new construction, Multifamily rental rehab, New construction for ownership	Annual allocation (\$):	\$ 50,000.00	\$ 200,000.00	Growth of this funding source is dependent upon the City's new residential production and associated payment-in-lieu fees.
			Program Income (\$):	\$ -		
			Prior Year Resources (\$):	\$ 925,000.00		
			Total (\$):	\$ 975,000.00		

SP-40 Institutional Delivery Structure – 91.215(k)

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

Please see [SP-40 Institutional Delivery Table](#) at the end of this section.

- 2. Assess any strengths or gaps in the institutional delivery system:**

In December 2016, the Brookline-Newton-Waltham-Watertown Continuum of Care (BNWW CoC) previously led by the City of Newton, merged with the Massachusetts Balance of State Continuum of Care (BoS CoC), under the supervision of the Department of Housing and Community Development. The City of Newton actively collaborates and coordinates with the BoS CoC through the City of Newton's ESG allocation process and planning efforts.

Since the merger, the City of Newton has successfully integrated into the BoS CoC's Coordinated Entry system, which assesses the housing needs of homeless individuals and meets those needs through the housing placement of available units across the 80+ member communities in the consortium. The merger effectively maximized and expanded existing regional resources to better connect homeless individuals with information, referrals, and assistance.

Among the City's five ESG subrecipients, the BoS CoC's Coordinated Entry system reported receiving 97 applications from the subrecipients since January 2017. In addition, the BoS CoC has referred 42 individuals to the subrecipients, and 11 individuals have been housed through the subrecipients. Domestic violence providers also access SafeLink, Massachusetts statewide domestic violence hotline, which places individuals into safe emergency shelters.

The City of Newton engaged with a number of housing and service providers, who expressed the lack of existing housing resources and tools to identify affordable housing units in the area. While there is a need to build more affordable housing in the MetroWest region, the ability to also identify affordable housing options has been a challenge for providers and low-income individuals and families. Most recently, the Kuehn Charitable Foundation announced its partnership with several state housing agencies and affordable housing advocates for the creation of the Housing Navigator, the state's largest searchable database for deed-restricted housing. Expected to be released in 2020, this one-stop online shop will allow individuals to search for affordable housing units throughout the state.

The Town of Brookline Department of Planning and Community Development is charged with managing and executing the goals of the Consolidated Plan. The Town has a strong network of departments, local organizations, and commissions which provide support to the Brookline's low to moderate income and homeless populations in a multitude of different ways. This structure relies on continuous contact, discussion, and referrals to successfully implement a

complex housing and social service delivery program. The Town lacks a homeless shelter but is able to rely on organizations such as the Brookline Community Mental Health Center to provide services to homeless individuals in the Town. If a gap in services were to occur, it would be identified and eliminated as part of the normal process of providing affordable housing and supportive programs.

The communities of Bedford, Concord, Lexington, Sudbury and Wayland work in close collaboration with the Regional Housing Service Office (RHSO) to identify potential HOME funded projects and programs and ensure the HOME funded projects meet regulatory requirements. The RHSO works with town administrators, local housing committees and housing authorities to identify priority projects and housing initiatives.

The strength of Framingham's institutional delivery system lies in the diversity of the City's engaged organizations. Under the leadership of the Community Development Office, a network of City departments, private nonprofits, and public agencies work collaboratively to address the needs of low- and moderate-income persons. Framingham notes that the complexity and amount of regulatory requirements added to lean programs and organizations presents an ongoing challenge to the existing institutional delivery system.

The Town of Natick collaborates with the Natick Affordable Housing Trust and Natick Housing Authority to identify potential HOME funded projects and programs and ensure the HOME funded projects meet regulatory requirements.

Needham's Planning and Community Development Department is primarily responsible for coordinating the implementation of the Consolidated Plan, largely through its community housing specialist. This Department will work closely with other municipal entities such as the Affordable Housing Trust Fund, Community Preservation Committee, as well as permitting agencies to advocate for housing initiatives. It will also collaborate with the Needham Housing Authority on its modernization and redevelopment efforts. Needham established a Municipal Affordable Housing Trust that provides a dedicated fund to invest in affordable housing initiatives and potentially support the implementation of the Consolidated Plan. The Town also has access to Community Preservation Act funding that has provided support for a number of housing-related activities including a group home for developmentally disabled adults and a development consultant to assist the NHA with financing applications for the modernization of its Captain Robert Cook and Seabeds Way federal developments for families and seniors/younger disabled, respectively.

The Waltham City Planning Department leads the implementation of the goals included in the Consolidated Plan. Several nonprofit organizations operate in Waltham, providing a variety of services to at-risk individuals, special needs populations and homeless persons. These organizations offer much needed services to vulnerable residents but are unable to fully meet the demands of the local homeless population. The City of Waltham homeless shelters operate at capacity. There is a lack of supportive mental health services, substance abuse counseling

and detoxification services being provided to assist this population in the transition to permanent housing placement. Waltham's bordering cities and towns of Watertown, Lexington, Lincoln, Newton, Belmont and Weston operate no permanent homeless shelters, which places an additional strain on the population seeking support in Waltham.

The Watertown Department of Community Development and Planning is responsible for executing the Consolidated Plan. The Town has a strong network of organizations that can provide referral and support to individuals and families in need, including Watertown's social service resource specialist, who is employed by Wayside Youth and Family Support Network; and works with homeless or near-homeless individuals and families, including unaccompanied youth. The Health Department, Senior Center, and Watertown Housing Partnership are other important entities in the institutional system.

3. Availability of services targeted to homeless persons and persons with HIV and mainstream services:

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	
Mortgage Assistance	X	X	
Rental Assistance	X	X	
Utilities Assistance	X	X	
Street Outreach Services			
Law Enforcement	X	X	X
Mobile Clinics	X	X	X
Other Street Outreach Services	X	X	X
Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	X
Education			
Employment and Employment Training	X	X	X
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X
Other			
Other <ul style="list-style-type: none"> • Case management • Assessment • Permanent housing 	X	X	

HUD Table 34 - Homeless Prevention Services Summary

4. Describe the extent to which services targeted to homeless person and persons with HIV and mainstream services, such as health, mental health and employment services are made available and used by homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families and unaccompanied youth) and persons with HIV within the jurisdictions. ,

The City of Newton's ESG program provides funding to nonprofit organizations: to support emergency shelters and transitional shelters for homeless individuals and families; to prevent individuals and families from becoming homeless; and to rapidly re-house homeless individuals and families and move them towards independent living. Annually, the City of Newton issues a RFP and awards ESG funds to nonprofit organizations that have demonstrated an outstanding capacity to meet the needs of the program.

Prior to issuing the RFP, the City of Newton will convene local providers from the former BNWW CoC, as well as representatives from the BoS CoC, to discuss the allocation of ESG funds among the program's eligible components. Components include emergency shelter, homelessness prevention, rapid re-housing, street outreach, and Homeless Management Information System (HMIS).

In FY19 (FFY18), the City of Newton successfully expended CDBG and ESG funds to meet the needs of homeless individuals and families across the BNWW region. The information below provides details about each program and its performance in meeting community needs.

- **Brookline Community Mental Health Center** – Homelessness Prevention and Rapid Re-housing: The two programs served a total of 48 individuals (26 households). Services include case management and financial assistance for rent, security deposit, moving costs, and housing search and placement.
- **Community Day Center of Waltham** – Shelter Services: This program served 502 individuals who received extensive case management for housing placement, employment and training, alcohol and substance abuse, healthcare, and basic life skills.
- **Horace Cousens Industrial Fund** – Emergency Payments for Vulnerable Individuals and Families: This program assisted 96 individuals who were experiencing a financial crisis due to unexpected expenses, serious illnesses, or a sudden change in income. Individuals received an emergency payment to avoid homelessness and utility shut-off.
- **Middlesex Human Service Agency** – Bristol Lodge Men's and Women's Shelters: This program served 368 individuals who received emergency shelter and case management for housing placement, employment and training, healthcare, and basic life skills.
- **REACH Beyond Domestic Violence** – Emergency Shelter and Shelter Rehabilitation: The two programs served 28 individuals (14 households), of which, 7 individuals were moved out of the shelter and into permanent housing. Individuals served were survivors of domestic violence who received support through emergency shelter and case management for housing placement, employment, alcohol and substance abuse, and healthcare.

- **The Second Step** – Transitional Residence Operations, Shelter Rehabilitation, Homelessness Prevention, and Rapid Re-housing: The four programs served a total of 79 individuals (36 households), of which, 3 households were moved into permanent housing. Individuals served were survivors of domestic violence, who received support through transitional housing, case management, and financial assistance for rent, security deposit, moving costs, and housing search and placement.

Consortium

Through an extensive partnership between The Brookline Community Mental Health Center (BCMHC) and the Brookline Housing Authority (BHA), the Transitional Housing Program helps homeless families leave Massachusetts Department of Housing and Community Development (DHCD) shelters, regain stability, and move towards independence by being placed in a BHA family housing development unit for up to nine months. Residents work with BCMHC staff to develop a self-sufficiency plan and build the skills and resources necessary to achieve their goals. At the end of nine months, after meeting their goals, families transition to permanent housing status which includes an additional 6-months of specialized support.

The Brookline Community Mental Health Center (BCMHC) regularly consults with the public schools, the Brookline Housing Authority, Brookline Council on Aging, courts, the Health Department, and Police Department to identify homeless individuals and families in need of support. The Center also frequently receives referrals for homeless families living in Brookline who have lost housing due to fire, domestic violence situations, or financial misfortunes. The team can help with homelessness by stabilizing the situation, identifying housing options, negotiating with a landlord/site manager and also working with clients on budgeting, accessing job training and in some cases, providing direct funding for up to six months of rent. The BCMHC also offers assistance with food, rental and utility payments, referrals to housing, food pantry, medical services, and transportation through the local Safety Net Program, a program supported through the Brookline Community Foundation.

The Pine Street Inn owns and/or operates five Single Room Occupancy properties containing 121 units in Brookline, which serve many former homeless individuals. The Brookline Rental Assistance for the Chronically Homeless Program is managed and operated by the Pine Street Inn in partnership with the Brookline Housing Authority. HEARTH and VinFen also operate permanent housing programs in Brookline, which provide a total of 10 units for formerly homeless individuals.

For the communities of Bedford, Concord, Lexington, Sudbury and Wayland the towns' role in service delivery to households experiencing homelessness is often through counseling and referrals to area service providers and other resources. Some communities have funds that are dedicated to assisting in emergency situations, but funding is limited and often only available as a one-time financial assistance.

Framingham has a variety of housing and supportive services for homeless individuals and families. Supportive services help participants achieve housing stability and self-sufficiency.

South Middlesex Opportunity Council provides housing services for families, individuals, survivors of domestic violence, and persons with HIV and AIDS. Framingham Department of Veteran's Services, Wayside Community Programs, Pathways Family Shelter, Voices Against Violence; Framingham Housing Authority, Framingham Health Department and Framingham Legal Services work together to successfully serve and rehouse homeless individuals and families, and prevent at-risk households from becoming homeless.

Natick's role in service delivery to households experiencing homelessness primarily involves referrals to area service providers such as Family Promise and funding short-term emergency hotel shelters through the Affordable Housing Trust and Police Department.

While there are no services that are specifically directed to those who are homeless, except emergency housing from the Needham Housing Authority, there are a number of social service agencies that provide important assistance to Needham residents to help them remain healthy and stable in the community and avoid the risks of homelessness. For example, the Council on Aging supports seniors' independence through counseling for those who are struggling with rising housing costs and might be at risk of homelessness. Riverside Community Care, located in Needham, serves families, particularly households confronting domestic violence or behavioral or mental health challenges. The Needham Community Council also provides an array of services to those who have unmet health, educational or social needs to support the needs of families including emergency assistance, a food pantry and a thrift shop.

Waltham recently hired an outreach worker to engage directly with the homeless population and provide a coordinated effort between the Waltham Police Homeless Taskforce and the Health Department. The City allocates CDBG funding to local social service agencies to provide direct services. Waltham also budgets \$100,000 annually for a Warming Center that opens each evening from December to March for the homeless that are not able to be housed in the Massachusetts Housing & Shelter Alliance (MHSA) shelters.

Watertown's primary effort to assist homeless households is housing search assistance. Both the Town of Watertown Social Services Coordinator and local nonprofit Metro West Collaborative Development work with homeless households to identify and apply for affordable housing.

5. Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above:

While several services exist across the BNWW region, the homeless and non-homeless special needs population face a number of barriers. First, the lack of public transportation options prohibits individuals from accessing services, which are typically not located in any one community. Second, translation and interpretation services are not widely available to all providers. Common barriers include the cost of services and the lack of available resources that specialize in the multitude of spoken languages, such as Amharic, Urdu, Kurdish, and Haitian Creole. As a result, providers are communicating to the best of their ability by accessing the clients' network of family and friends, bilingual staff, and Google translate.

Third, a majority of the providers access legal assistance through the Greater Boston Legal Services (GBLS). GBLS provides free legal assistance and representation on civil matters to hundreds of low-income residents in the MetroWest region. However, the high demand for legal assistance results in long delays and the inability to access services for immediate needs. Finally, there is a lack of financial literacy services made available to low-income individuals and families. By engaging individuals in financial literacy services, they will be able to develop a long-term plan and make informed decisions, with the goal of moving toward financial stability.

Brookline has a strong service delivery system to assist homeless persons or persons at-risk of becoming homeless. Programs and counseling are available through the Brookline Community Mental Health Center, the Brookline Health Department, the Brookline Council on Aging Center, the Veteran's Services Department, the Brookline Housing Authority, Pine Street Inn, HEARTH and Vinfen. These agencies work together and with other Town Departments to facilitate access to services and resources, including affordable housing, SNAP benefits, health insurance, fuel assistance, subsidized transportation, state childcare vouchers, emergency financial assistance, etc. Brookline does not currently have any emergency shelter facilities for homeless individuals or families. Those households must obtain emergency shelter in nearby communities, primarily Boston. In addition, the Town offers limited transitional housing opportunities.

Although social workers are on staff to provide counseling in Bedford, Concord, Lexington, Sudbury and Wayland, there are limited services available in these communities. Each community has an active Veterans' Service Officer to assist veterans in accessing services.

In Framingham, services for special needs populations (physical, emotional and/or developmental) may be provided by single focus advocacy groups such as ARC of Metro West and Department of Developmental Services. Advocates, Wayside Youth and Family Support, SMOC and Framingham Housing Authority offer services and housing to these populations as well. A service gap exists when these individuals "age out" of qualifying for services after 21 years of age, although they still require the support.

Natick has limited services available to homeless people and special needs residents. The Housing Authority, Community & Economic Development Department, Housing Trust, Police and Veteran's Agent collaborate to assist these populations with their housing needs.

As a relatively small suburban community, Needham does not have a comprehensive human service delivery system and some residents need to seek services outside of town based on their special needs. In such cases, residents may encounter challenges in accessing these services, particularly in regard to transportation, despite Needham's access to four commuter rail stations and MBTA bus service. The presence of Beth Israel Deaconess Hospital in Needham provides excellent medical support and related health care services which strengthens the local service delivery system.

The supportive services available in the Waltham community help participants achieve housing stability, self-sufficiency, and employment. Case managers provide assistance with financial management, tenancy issues, access to employment programs, food, medical and mental healthcare. Chronically homeless populations receive assistance through the Continuum of Care as well as through state funded programs. The funding to address the issue of chronically homeless populations is not sufficient enough to provide the necessary resources and consequently individuals and families end up in emergency shelters until transitional or permanent housing is established. Veterans and their families are assisted through the local veteran's services administration.

Waltham will continue to administer CDBG and HOME funding to a variety of programs and partners to first prevent low-income persons from becoming homeless and second to support and administer programs that assist the homeless in obtaining safe, affordable and sustainable housing. These efforts will include a continuum of programs ranging from emergency shelters to transitional housing to permanent supportive housing services. The extent of activity will be dependent upon the level of funding available in the face of many competing needs.

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

Annually, the City of Newton issues a public service RFP and an ESG RFP to solicit proposals from qualified organizations that have demonstrated an outstanding capacity to meet the needs of the low- and moderate-income population in Newton and the former BNWW CoC. As detailed above, public transportation options, translation and interpretation services, legal services, and financial literacy services were identified as gaps in Newton's public services. Looking to FY21, the City of Newton will revise its public service RFP to better highlight these specific needs and to solicit proposals that will help close these gaps. Additionally, staff will continue to collaborate with the City's Health and Human Services Department, BoS CoC, and other partners to combine resources and investigate other creative strategies to address the priority needs related to public services and homelessness.

In FY19, the Mayor of Newton reinstated the Newton Housing Partnership to act in an advisory capacity to support the creation and preservation of affordable housing throughout the City. Staff will continue to collaborate with this knowledgeable group to identify implementable strategies for increasing Newton's affordable housing stock, particularly for extremely-low- and low-income households. In addition, the City will continue to support new affordable housing developments as well as the rehabilitation of existing affordable units through its public funding sources. Staff will also work to strengthen the processes related to managing the City's updated Inclusionary Zoning program, which is expected to add a significant amount of affordable units over the next five (5) years. Lastly, the City will continue to partner with the Newton Housing Authority on the rehabilitation of its existing units as well as the development of new affordable housing projects.

In addition, the City of Newton will continue to improve the mobility and accessibility for people with disabilities through the removal of architectural barriers. The Housing and Community Development Division (Division) will continue to work collaboratively with the Commission on Disability and the ADA/Section 504 Coordinator to identify and prioritize access projects for CDBG funding. Furthermore, the Division is actively working with the Commission on Disability and other city departments to update the ADA Transition Plan. The ADA Transition Plan includes: a list of physical barriers that limit the accessibility of programs, activities, or services; methods to remove barriers and make public facilities accessible; and schedule to get the work completed. The ADA Transition Plan will primarily prioritize public buildings and parks that require immediate attention due to inaccessible approach and entrance, which is the first priority based on the 2010 ADA Standards for Accessible Design.

Brookline will continue to seek opportunities to build more permanently affordable housing units with supportive services for persons that have disabilities, many of which are currently homeless and/or extremely low-income. The Town will also continue to seek state, federal, and private funding to support its homeless prevention and emergency assistance activities.

Framingham's Community Development (CD) Office will continue to enhance its delivery

through the improvement of its programs and procedures. The City is also instrumental in hosting workshops on relevant homeless topics to bring organizations together and enable them to better serve this population. The CD Office is involved in Framingham Community Partners, which is a partnership of local service providers founded to enhance services for low and moderate income residents.

Needham town officials promoted greater coordination in the local human service delivery system by combining the Youth Services Department, Council on Aging, and Board of Health into a consolidated Health & Human Services Department. The Town also participates with the Towns of Wellesley, Weston, and Wayland in the West Suburban Veterans District, linking veterans and their families with social services.

As an entitlement community, the Waltham has developed relationships and contacts with a number of service providers; nonprofit organizations; housing developers and lenders; and agencies at the state, regional and local levels. The Housing Division understands its role in the delivery system and will work to develop and formalize an organized and effective delivery system including as many of the entities responsible for program delivery as possible.

There are no significant gaps in the Watertown's delivery system rather, it is operating in a market-place with insufficient supply. The local institutions are regularly supporting efforts to expand resources and opportunities for low-income people. A recent example in Watertown is the passage of the Community Preservation Act which, will generate nearly \$2 million annually for affordable housing, historic preservation and open space.

SP-40 Institutional Structure for City of Newton & WestMetro HOME Consortium for FY21-25

Responsible Entity	Responsible Entity Type	Role	Geographic Area Type
2 Life Communities	Nonprofit Organization	Affordable housing-rental; homelessness; non-homeless special needs; community development: public services	Region
Advocates	Nonprofit Organization	Homelessness	Jurisdiction
Balance of State Continuum of Care	Government Agency	Homelessness	Region
Barry L. Price Rehabilitation Center	Nonprofit Organization	Non-homeless special needs; community development: public services	Jurisdiction
Town of Bedford	Subrecipient	Affordable Housing - Rental; Non-homeless special needs; Planning	Jurisdiction
Bedford Housing Authority	PHA	Public Housing	Jurisdiction
Bedford Housing Trust	Public Institution	Affordable Housing - Rental	Jurisdiction
Belmont Food Pantry	Nonprofit Organization	Homelessness; non-homeless special needs	Jurisdiction
Belmont Housing Authority	PHA	Public Housing	Jurisdiction
Belmont Housing Trust	Public Institution	Affordable Housing - Rental	Jurisdiction
Brookline Community Mental Health Center	Subrecipient	Homelessness; non-homeless special needs; community development: public services	Jurisdiction
Brookline Council on Aging	Government Agency	Non-homeless special needs; community development: public services	Jurisdiction
Brookline Department of Planning and Community Development - Housing Division	Subrecipient	Planning; affordable housing - ownership; affordable housing - rental	Jurisdiction
Brookline Health Department	Government Agency	Non-homeless special needs; homeless; community development public services	Jurisdiction
Brookline Housing Advisory Board	Public Institution	Planning; affordable housing - ownership; affordable housing - rental	Jurisdiction
Brookline Housing Authority	PHA	Affordable housing- rental	Jurisdiction
Brookline Improvement Coalition	Community-Based Development Organization (CBDO)	Affordable housing - rental; non-homeless special needs	Jurisdiction
Brookline Veterans Services	Government Agency	Non-homeless special needs; community development: public services; homelessness	Jurisdiction
Caritas Communities	Nonprofit Organization	Affordable Housing - rental	Region
Charles River Community Health Center	Nonprofit Organization	Community development: public services; homelessness and non-homeless special needs	Jurisdiction
Citizens for Affordable Housing in Newton Development Organization (CAN-DO)	Community Housing Development Organization (CHDO)	Affordable housing-rental; affordable housing-ownership	Jurisdiction
Community Day Center of Waltham	Subrecipient	Homelessness; Community Development: public services	Region
Town of Concord	Subrecipient	Planning	Jurisdiction

Responsible Entity	Responsible Entity Type	Role	Geographic Area Type
Concord Housing Authority	PHA	Public Housing	Jurisdiction
Economic Mobility Pathways	Subrecipient	Community development: public services	Jurisdiction
Family ACCESS of Newton	Subrecipient	Community development: public services	Jurisdiction
Framingham Adult ESL Program	Government Agency	Community development: public facilities	Jurisdiction
Framingham Department of Public Works	Government Agency	Community development: public facilities	Jurisdiction
City of Framingham- Community & Economic Development Division	Subrecipient	Community Development: Economic Development, public services, neighborhood improvements, public facilities; Non-homeless special needs; Affordable Housing: ownership, rental; Planning.	Jurisdiction
Framingham Coalition Community Connections	Nonprofit Organization	Community development: public services	Jurisdiction
Downtown Framingham Inc.	Nonprofit Organization	Community development: economic development	Jurisdiction
Framingham Housing Authority	PHA	Public Housing	Jurisdiction
Framingham Inspectional Services Department	Government Agency	Community development: neighborhood improvements	Jurisdiction
Framingham Park and Recreational Department	Government Agency	Community development: public facilities	Jurisdiction
Framingham Public High School Resiliency for Life Program	Nonprofit Organization	Community development: public facilities	Jurisdiction
Framingham Housing Authority	PHA	Public Housing	Jurisdiction
Framingham Public Library	Government Agency	Community development: public services	Jurisdiction
Grantham Group	Private Industry	Affordable Housing -Rental	Region
HEARTH	Nonprofit Organization	Affordable housing-rental; homelessness	Region
Hebrew Senior Life	Nonprofit Organization	Affordable housing - rental; community development - public services	Jurisdiction
Horace Cousens Fund Industrial	Subrecipient	Community development: public services	Jurisdiction
Hoops & Homework	Nonprofit Organization	Community development; public facilities	Jurisdiction
Jewish Family & Children's Services	Subrecipient	Community development: public services; Non-homeless special needs	Jurisdiction
John M. Boys and Girls Club of Newton	Nonprofit Organization	Community development: public services	Jurisdiction
Latinos in Action	Nonprofit Organization	Community development: public services	Jurisdiction
Town of Lexington	Subrecipient	Planning	Jurisdiction
Lexington Housing Authority	PHA	Public Housing	Jurisdiction
Lexington Housing Assistance Board	Government Agency	Affordable Housing - rental	Jurisdiction
Massachusetts Department of Housing and Community Development	Government Agency	Affordable housing-rental; affordable housing-ownership; homelessness; non-homeless special needs; community development: public services	State

Responsible Entity	Responsible Entity Type	Role	Geographic Area Type
MassHousing	Government Agency	Affordable Housing-rental; Affordable Housing ownership	State
Metropolitan Area Planning Council (MAPC)	Government Agency	Planning	Region
Metro West Collaborative Development, Inc.	Community Housing Development Organization (CHDO)	Affordable Housing-rental; Affordable Housing-ownership	Region
Middlesex Human Service Agency	Subrecipient	Homelessness	Region
Town of Natick	Subrecipient	Planning	Jurisdiction
Natick Housing Authority	PHA	Public housing	Jurisdiction
Natick Service Council	Government Agency	Affordable housing-rental	Jurisdiction
Needham Planning and Community Development Department	Subrecipient	Planning; Affordable Housing, Community Development: neighborhood improvements, Economic Development	Jurisdiction
Needham Affordable Housing Trust	Government Agency	Affordable Housing	Jurisdiction
Needham Housing Authority	PHA	Public Housing; Affordable Housing	Jurisdiction
Needham Community Preservation Committee	Government Agency	Affordable Housing	Jurisdiction
Newton Department of Planning and Development - Housing and Community Development Division	Government Agency	Planning; affordable housing, community development: public facilities, community development: public services, homelessness, non-homeless special needs	Jurisdiction
Newton Community Development Foundation	Subrecipient	Affordable housing-rental; non- homeless special needs; community development: public services	Jurisdiction
Newton Housing Partnership	Government Agency	Affordable housing-ownership; affordable housing - rental; homelessness; planning	Jurisdiction
Newton Fair Housing Committee	Government Agency	Affordable housing-ownership; affordable housing - rental; homelessness; planning	Jurisdiction
Newton Commission on Disability	Government Agency	Non-homeless special needs, community development: public facilities	Jurisdiction
Newton Health and Human Service Department	Government Agency	Affordable housing - rental, homelessness; community development: public services	Jurisdiction
Newton Community Preservation Committee	Government Agency	Affordable housing - ownership, affordable housing - rental	Jurisdiction
Newton Department of Public Works	Government Agency	Community development: public facilities; non-homeless special needs	Jurisdiction
Newton Department of Public Buildings	Government Agency	Community development: public facilities; non-homeless special needs	Jurisdiction

Responsible Entity	Responsible Entity Type	Role	Geographic Area Type
Newton Department of Parks and Recreation	Government Agency	Community development: public facilities; non-homeless special needs	Jurisdiction
Newton Housing Authority	PHA	Public Housing	Jurisdiction
Newton-Wellesley-Weston Committee for Community Living	Nonprofit Organization	Non-homeless special needs	Jurisdiction
REACH Beyond Domestic Violence	Subrecipient	Community development: public services	Jurisdiction
The Salvation Army, Waltham	Nonprofit Organization	Community development: public services	Jurisdiction
South Middlesex Opportunity Council (SMOC)	Community Housing Development Organization (CHDO)	Affordable housing- rental, homelessness, non-homeless special needs	Region
Town of Sudbury	Subrecipient	Planning	Jurisdiction
Sudbury	PHA	Public housing	Jurisdiction
B'Nai B'RITH Housing	Nonprofit Organization	Affordable housing-rental	Region
Pelham II Corporation	Nonprofit Organization	Community development: public facilities	Jurisdiction
Pine Street Inn	Nonprofit Organization	Affordable housing- rental, Homelessness	Region
Plowshares Education Development Center	Subrecipient	Community development: public services	Jurisdiction
Preservation of Affordable Housing (POAH)	Community Housing Development Organization (CHDO)	Community development: public facilities	Region
United Way of Tri-County	Nonprofit Organization	Non-homeless special needs	Jurisdiction
Vinfen	Nonprofit Organization	Affordable housing-rental; homelessness; non-homeless special needs; community development: public services	Region
Town of Watertown	Subrecipient	Planning; community development: public services	Jurisdiction
Watertown Council on Aging	Government Agency	Non-homeless special needs	Jurisdiction
Watertown Housing Authority	PHA	Public Housing	Jurisdiction
Waltham Homeless Coalition	Nonprofit Organization	Planning; Homelessness	Jurisdiction
Waltham Housing Authority	PHA	Public Housing	Jurisdiction
City of Waltham Housing Division	Government Agency	Homelessness; Non-homeless special needs; affordable housing rental; affordable housing ownership	Region
The Waltham Partnership for Youth	Nonprofit Organization	Community development: public services	Jurisdiction
City of Waltham Planning Department	Subrecipient	Planning; community development: public facilities; neighborhood improvements; public services; economic development	Jurisdiction
City of Waltham Police Homeless Task Force	Government Agency	Homelessness	Jurisdiction
WATCH CDC	Nonprofit Organization	Affordable housing-rental; homelessness; community development: public services	Jurisdiction
Wayside Family and Children	Nonprofit Organization	Non-homeless special needs, homelessness	Jurisdiction

Responsible Entity	Responsible Entity Type	Role	Geographic Area Type
Town of Wayland	Subrecipient	Planning	Jurisdiction
Wayland Housing Authority	PHA	Public Housing	Jurisdiction
Wayland Housing Trust	Government Agency	Affordable housing-rental	Jurisdiction

SP-45 Goals Summary – 91.215(a)(4)

1. Goals Summary Information

Please see SP-45 Goals Table at the end of this section.

2. Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2):

Utilizing HOME funds, it is estimated that the Consortium communities will provide affordable housing to 398 332 extremely low-income, low-income, and moderate-income families between Fiscal Year 2021 and 2025. Approximately 150 households will be provided Tenant-Based rental Assistance; three income-eligible homeowner families will be assisted through rehabilitation, 86 lower-income families will have access to affordable housing through the rehabilitation of rental units, and 93 lower-income families will be provided with affordable housing through new rental unit construction.

SP-45 Strategic Plan Goals for the WestMetro HOME Consortium Five-Year Totals for FY21-25

Community	Name of Goal	Funding	Description of Goal	Priority Needs Addressed	Category of Goal	Start Year	End Year	Outcome	Objective	Goal Outcome Indicator	GDI Quantity	GDI Unit of Measurement
Newton	Administration	CDBG: \$2,031,323.00	Administration of the CDBG program	Affordable housing, production of units; Affordable housing, rehab.; Affordable housing, acquisition of existing units; Non-Housing Community Development, public services; Architectural Access; Fair Housing	Affordable housing; Non-homeless special needs; Non-housing community development	2021	2025	Availability/Accessibility	Create suitable living environments	23- Other (Organization)	1	23- Other (Organization)
Newton	Production of New Affordable Units	CDBG: \$5,794,002.00	Create affordable rental and ownership housing near amenities, village centers, and public transportation options to promote housing equality and economic and demographic diversity. Support older adults to allow them to remain in Newton as they age.	Affordable housing, production of units	Affordable housing	2021	2025	Affordability	Provide decent affordable housing	7-Rental units constructed	20	7-Household housing unit
Newton	Rehabilitation of Existing Units	CDBG: \$325,000	Continued funding for the housing rehab program for income-eligible residents, including improvements for accessibility and safety, especially for seniors to encourage aging in place.	Affordable housing, rehab of existing units	Affordable housing	2021	2025	Sustainability	Create suitable living environments	9-Homeowner housing added	1	9-Household housing unit
Newton	Preservation of Affordable Units	\$0	Preserve the affordability of deed-restricted units to support successful tenancy of low- to moderate-income residents of Newton.	Affordable housing; acquisition of existing units	Affordable housing	2021	2025	Sustainability	Provide decent affordable housing	8-Rental units rehabilitated	28	8-Household housing unit
Newton	Support Affordable Homeownership	\$0	Financial support for low- and moderate-income first-time homebuyers purchasing deed-restricted affordable units.	Affordable housing; acquisition of existing units	Affordable housing	2021	2025	Affordability	Provide decent affordable housing	10-Homeowner housing rehabilitated	12	10-Household housing unit
Newton	Fair Housing	\$0	Meet the need for more fair housing education, enforcement, and obligations.	Fair Housing	Affordable housing	2021	2025	Availability/accessibility	Provide decent affordable housing	23-Other - Affordability of housing units preserved	33	23-Other - Household housing unit
Newton	Supportive Services for Homeless and At-Risk of Homelessness	ESG: \$838,670.00	Provide supportive services for individuals and families that are homeless or at-risk of homelessness, including financial support for existing emergency and transitional housing.	Homeless, emergency shelter/transitional housing; homeless, prevention; homeless, rapid re-housing	Homeless	2021	2025	Availability/accessibility	Create suitable living environments	11-Direct financial assistance to homebuyers	8	11-Households assisted
Newton	Human Services	CDBG: \$1,538,490	Financial support for programs that directly benefit low- and moderate-income youth, families, seniors, and persons with disabilities.	Non-Housing Community Development, public services	Non-homeless special needs	2021	2025	Availability/accessibility	Create suitable living environments	23-Other - Educational events	4	23-Other - Educational events held
Newton	Architectural Access	CDBG: \$514,682.33	Remove architectural barriers throughout the City to public thoroughfares, public buildings, parks, and recreational facilities and increase accessibility and mobility for persons with disabilities.	Architectural Access	Non-housing community development	2021	2025	Availability/accessibility	Create suitable living environments	23-Other - Assistance to Homeless and At-Risk of Homelessness	560	23-Other - Persons Assisted
Consortium-wide	Administration	HOME: \$756,725.46	Administration of the HOME program.	Tenant Based Assistance; Housing Rehab; Production of Rental Units	Affordable Housing	2021	2025	Affordability	Provide decent affordable housing	3-Public service activities other than Low/Moderate Income Housing benefit	2,500	3-Persons assisted
Consortium-wide	Tenant Based Assistance for Rental Housing	HOME: \$2,365,643.99	HOME funds will be used for a TBRA program to assist eligible households with security deposit assistance to move-in to affordable rental housing.	Tenant Based Assistance for Rental Housing	Affordable Housing	2021	2025	Affordability	Provide decent affordable housing	1-Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	15,000	1-Persons Assisted
Consortium-wide	Rehabilitation of Existing Units	HOME: \$4,462,881.68	HOME funds will be used to support the rehabilitation of affordable rental units, including public housing, and homeowner housing throughout the Consortium.	Housing Rehab	Affordable Housing	2021	2025	Affordability	Provide decent affordable housing	23-Other Organizations	9	23-Other Organizations
Consortium-wide	Production of Affordable Units	HOME: \$2,887,185.41	HOME funds will be used to increase affordable rental housing in Town.	Production of Rental Units	Affordable Housing	2021	2025	Affordability	Provide decent affordable housing	12-Tenant-based rental assistance/rapid rehousing	150	12-Households Assisted
Consortium-wide	CHDO Set-aside	HOME: \$1,180,432.26	HOME funds will be used to create affordable rental housing through acquisition, rehabilitation, and development by CHDOs.	Production of Rental Units; Housing Rehab	Affordable Housing	2021	2025	Affordability	Provide decent affordable housing	8-Rental units rehabilitated	83	8-Household housing unit
Consortium-wide	CHDO Operations	HOME: \$420,008.00	HOME funds for the operation of Community Housing Organizations in the WestMetro HOME Consortium.	Production of Rental Units; Housing Rehab	Affordable Housing	2021	2025	Affordability	Provide decent affordable housing	10-Homeowner housing rehabilitated	3	8-Household housing unit
										7-Rental units constructed	86	12-Households Assisted
										9-Homeowner housing added	0	12-Households Assisted
										8-Rental units rehabilitated	3	8-Household housing unit
										7-Rental units constructed	7	8-Household housing unit
										23-Other (Organization)	1	23- Other (Organization)

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

1. Describe any need to increase the number of accessible units (if required by a Section 504 Voluntary Compliance Agreement):

In the Consortium, there are approximately 4,420 housing authority units suitable for people with disabilities. Currently none of the Consortium communities are under a 504 Voluntary Compliance Agreement to increase the number of accessible units. Housing Authorities make all possible reasonable accommodations that are requested by applicants and tenants, and continue to explore ways to increase accessible housing stock.

Approximately five percent of the Brookline Housing Authority's residential units within their development portfolio are wheelchair accessible. At the same time, there are approximately 117 households on the BHA's waiting list for units accessible for people with physical handicaps (i.e. people who use a wheelchair or other mobility devices and/or have other physical limitations). The BHA accommodates incoming residents who have visual or hearing impairments on a case-by-case basis, by making modifications to their units such as audio annunciated intercom and alarm systems for visually impaired housings, or strobe intercom and alarm systems for hearing impaired households.

The Needham Housing Authority has 28 units that are handicapped accessible and plans to incorporate a significant number of handicapped accessible units as part of any redevelopment or new development activities.

The Newton Housing Authority continues to make all possible reasonable modifications to units to increase accessibility as requested by applicants and tenants, including the installation of ramps, grab bars, automatic door openers, appliances, etc.

2. Describe activities to increase resident involvement:

The Brookline Housing Authority (BHA) has an active town-wide resident association and supports residents' association activities at the individual public housing development level. Monthly BHA Board of Commissioners meetings are held at each of the BHA's public housing developments on a rotating basis to encourage interaction between the BHA Board, BHA staff, and residents. The BHA holds an annual Resident Advisory Board meeting to share program information and policy initiatives and to solicit feedback from residents. Resident input is also solicited with respect to all major capital improvement projects.

The Framingham Housing Authority (FHA) offers various opportunities for its residents to become homeowners or participate in management that the Community Development Department fully supports. An example is FHA's Family Self-Sufficiency (FSS) program, which is a voluntary service that encourages FHA residents, both Section 8 and Public Housing, to work towards becoming financially independent by maintaining a savings account for five years. FSS diverts funds from rent increases into an account for the participant household. At the five-year mark, residents use

the funds to accomplish a long-term goal, such as purchasing a home, paying for school or becoming debt free. The Community Development Department supports FSS participating residents and other FHA residents by notifying them of homeownership, rental, employment, Section 3 and community development opportunities as well as committee meetings through various outreach outlets.

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

The Needham Housing Authority (NHA) is working to reinvigorate the tenant groups which provide a means for tenants to gather, discuss concerns, and make recommendations to the administration regarding improvements. These groups have empowered residents to take an active role in the NHA's decision-making process regarding a wide range of NHA policies, programs, and projects. The tenant groups have been reformed, elections have taken place, and the officers now meet regularly.

The Newton Housing Authority (NHA) has worked to grow its Resident Services Department, hiring two licensed social workers over the past two years, to support an increased provision of social services and engage residents in NHA programming and decision-making activities.

Waltham Housing Authority (WHA) holds periodic meetings between WHA staff and residents to discuss issues of mutual concern. The WHA Service Coordinator reaches out to residents to provide information on resources and activities such as food pantries. Resident Advisory Boards are also encouraged by WHA staff.

The Watertown Housing Authority participated in the Massachusetts Learning, Employment, and Asset program (Mass LEAP) from August 2014 until August 2019. All participants were involved with intensive program training requirements such as job/career certification programs, attending college classes, and meeting with a financial coach once a month. One resident from WHA transitioned out of public housing through the homeownership program of Mass LEAP.

3. Is the public housing agency designated as troubled under 24 CFR part 902?:

There are no troubled housing authorities in the WestMetro HOME Consortium.

4. Describe the plan to remove the 'troubled' designation, if applicable:

N/A

SP-55 Barriers to affordable housing – 91.215(h)

1. Describe the barriers to Affordable Housing:

While there are community specific barriers to affordable housing, some of these impediments are experienced Consortium-wide. Regionally, limited developable land increases the cost of affordable housing development, budget cuts to federal and state resources reduce assistance to programs creating and preserving housing for lower income populations, and abutter opposition stymie projects that could yield new affordable housing stock. The Consortium communities' detail individual barriers to affordable housing in the paragraphs below.

There are multiple barriers to affordable housing in Brookline, which are underlined by the decreasing funding levels of federal and state resources to support the production and preservation of new and existing affordable housing. If a consistent, predictable funding stream were increased, the Town could better meet its housing needs. High off-street parking requirements for new residential developments, prohibition of new accessory dwelling units, and a lack of land zoned for multi-family housing (71% of land in Brookline is not zoned for multi-family) all create regulatory barriers to affordable housing.

In the towns of Bedford, Concord, Lexington, Sudbury and Wayland it is cost-prohibitive to create affordable housing. Available land for development of housing is limited and expensive. Most communities have predominantly single family zoning with minimum lot sizes of one acre and almost no zoning provision for multi-family units. This type of development is only permitted through special permits or MGL Chapter 40B, which is complicated, time consuming and frequently marked by neighborhood opposition to proposed developments. This opposition may be due to specific project factors, such as style, size and location, and this lack of support has hindered the creation of diverse types of units, both affordable and market rate.

Framingham's zoning bylaws currently limit the area where multi-family housing can be constructed. Diminished funding to support transportation alternatives further limits housing development that is accessible to employment centers and transportation options. The City does not allow accessory dwelling units to be constructed, which could provide a low-cost housing option. Framingham has recently made strides to jump start multi-family housing development. The central business district was redefined to include multi-family housing and transit orientated development. In 2013, the City amended its zoning bylaw to allow for cluster housing, multifamily housing, in addition to alternatives to the single family house.

Natick has zoning bylaws that do not encourage higher density multi-family housing. There are a number of areas, primarily in Natick Center, that identify affordable housing as an alternative use and provide incentives for developers to build affordable housing as part of a development, but these measures are limited and additional attempts to amend zoning have been unsuccessful. Most zoning in Natick has a minimum lot size requirement of at least 12,000 square feet. The high cost of real estate and construction make it difficult to maintain and develop housing that is affordable to a diverse population. Finally, the number of rental units in

the town declined significantly as a consequence of condominium conversions. Currently, Natick has no nonprofit housing developers. While the Town has an Affordable Housing Trust to promote and foster affordable housing development, to date it has not adopted financing mechanisms to provide the Trust resources to develop substantial numbers of affordable dwellings.

The high quality of Needham's school system and proximity to public transportation are driving up the Town's high property values, making it more difficult for low- and moderate-income households to enter the community. These high housing costs are also spurring the demolition of older, smaller and more affordable housing units in the private housing market with the replacement of significantly larger and more expensive homes that result in very little net growth in the housing stock. While the Town has enacted zoning that has promoted greater housing diversity and affordability over the past few years, there still remains room for regulatory improvements to better direct development to appropriate locations based on "smart growth" principles and offer incentives for incorporating public benefits, including affordable housing.

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

- Existing multi-family permitting processes. In Massachusetts, either a special permit or a comprehensive permit under Chapter 40B is typically required to create any multi-family housing (i.e. more than two units). These processes are often-times controversial and add time and cost to developments that could otherwise more easily create affordable housing units.
- Accessory apartment zoning. Accessory apartments are often more affordable to rent because they tend to be smaller, but the process for approval of these units is complicated and typically requires a special permit. It is estimated that there are 1,000 illegal accessory apartments in the city, all of which have not been properly inspected for compliance with the Massachusetts State Building Code and may pose serious health and safety concerns for occupants. Recently the city's zoning ordinance was amended to streamline the permitting of illegal accessory apartments that can be proven to be pre-existing from 1999, if they can be made code compliant. In April 2017, the city adopted the Accessory Apartment Ordinance which allows internal accessory apartments by-right in all Newton single and two-family homes.
- Lodging House Zoning Ordinance. In a lodging house, the lodger rents a rooming unit that is typically a bedroom, including a seating area. The lodger has access to, but not responsibility for, shared cooking and bath facilities with others in the house. They rent

their rooming unit directly from the lodging house operator, who maintains the common areas, including the kitchen and bath. A lodging house tends to offer a more affordable living situation than a traditional rental apartment. In 2018, the city passed a new lodging house amendment, making lodging houses an allowed use by special permit in all multi-family districts of the city. As part of the zoning amendment process, the city developed a proposed set of standards by which to regulate not only the formation of a lodging house, but also the continued operation of a lodging house. The new lodging house amendment specifically allows lodging houses above-ground in BU1, BU2, BU3, BU4, MU1, MU2, MU3, and MU4 districts.

- Procurement policies. The city's procurement policy for affordable housing projects that utilize CDBG and HOME funds can increase overall project costs and the upfront time required to develop plans and specifications. The city may explore changes to the policy that could mitigate this barrier while ensuring fair and open competition.

The largest barrier to affordable housing in Waltham is the constant increase in housing costs. Condo conversions are contributing to the rise in home values and decreasing the supply of rental units. While there are public policies to create and incentivize affordable housing, a majority of Waltham residents are unable to afford their current housing situation. Funding constraints hinder the City's ability to keep up with subsidizing housing in order to help families remain in their homes and avoid homelessness. Section 8, TBRA and other program subsidies are frequently not enough to cover the cost of renting in Waltham. The City's annual HOME allocation is approximately enough to provide one down payment assistance loan to a low to moderate income household if a property could be found within the HOME purchase price limits. Without subsidies, home ownership opportunities for low to moderate income residents in Waltham are unobtainable.

In Watertown, the cost to acquire sites is the number one challenge facing affordable housing developers. The lack of regulations for short term rentals enabled the industry to consume a significant amount of rental housing stock, thereby making affordable units less prevalent and less affordable. The Town does not currently permit Accessory Dwelling Units, however discussions have begun about the possibility of amending zoning regulations to allow this type of housing in certain situations.

2. Describe the specific efforts to be undertaken to reduce the barriers to affordable housing:

The Consortium communities aim to reduce barriers to affordable housing in the following ways.

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

- **Regulatory:** The Brookline Zoning ByLaw includes provisions to increase affordable housing through an inclusionary housing ordinance. Brookline will continue to use its zoning bylaw proactively to encourage affordable housing as part of market-rate projects through the inclusionary zoning provision.
- **Resource Allocation:** Brookline acts as a partner by matching fiscal resources and technical assistance to facilitate new affordable housing development town-wide. The Town will continue to use its own Housing Trust as a way to help write down high property and land costs associated with affordable housing development.
- **Education, Consultation and Advocacy:** The Brookline Housing Advisory Board is fundamental in promoting the preservation and creation of affordable housing. It studies and provides guidance to town staff and boards regarding Brookline's housing needs, policies, programs, and zoning tools.
- **Local Planning and Policy:** The Town is a strategic partner in pursuing public-private partnerships that foster affordable housing development in key strategic locations town-wide. Brookline assists the Brookline Housing Authority in numerous projects involving construction or repairs projects, major construction and renovation projects as well as smaller repair and replacement projects. Many other affordable housing development projects are funded with State programs, and the Town usually matches fiscal resources and technical assistance to facilitate new affordable housing development.

The towns of Bedford, Concord, Lexington, Sudbury and Wayland encourage local affordable housing initiatives through zoning changes and the adoption of inclusionary zoning provisions. The ability to access other local funds such as Community Preservation Act (CPA) and Housing Trust funds helps overcome the high cost of development. In addition, these communities support local housing authorities in their efforts to expand their portfolio with additional units.

In 2004, Framingham enacted an affordable housing bylaw requiring that at least 10% of rental units in new developments of 10 or more units are affordable. In 2013, the city amended its zoning bylaw to allow for cluster housing and multifamily housing. Finally in 2015, the central business district was redefined to include multi-family housing and transit orientated development. Currently, there is support from city residents to enact the Community Preservation Act within the community. These funds could assist the production of affordable housing units. The City also uses HOME funds to help defray the cost of developing affordable units in Framingham.

Natick will enforce a new Inclusionary Zoning for Affordable Housing section in the Town's zoning bylaw. This revolutionary new regulation requires affordable housing in any development yielding two or more net new dwellings. The Natick Affordable Housing Trust will use funds and/or land generated by Inclusionary Zoning to develop affordable housing in the town and continue to seek additional local funds from the Community Preservation Act to help overcome the high cost of development. Finally, the Trust will continue supporting the Natick Housing Authority in preserving their existing inventory and expanding their portfolio with additional units.

Needham is increasingly looking to develop affordable housing as part of redevelopment efforts in locations that have previously been zoned solely for business purposes. The Town also continues to evaluate town-owned properties that might be feasibly developed to include affordable housing. Needham proactively pursues affordable housing development based largely on Chapter 40B Guidelines that were prepared by the Town in 2012 to steer development to appropriate locations and take advantage of the "friendly 40B" process available through the state's Local Initiative Program (LIP). These Guidelines are being revisited and will be revised in the near future. The community housing specialist, is a newer position, created to build municipal capacity to promote affordable housing. Finally the Town will continue to support the Needham Housing Authority in its efforts to modernize its current developments and explore opportunities to expand the number of units.

In recognition of the existing barriers to the development of affordable housing in Newton, Division staff, along with staff in the Long Range Planning Division, intend to focus on the following programs and topic areas in the next five years:

- Zoning Reform

In FY21 (FFY20), the city intends to revise its zoning to increase permitting flexibility and development incentives for affordable housing. Potential zoning revisions include: adopting controls which are less reliant on special permits or 40B approvals; facilitating both new development and the adaptation of existing housing to better serve needs of older and disabled residents; rewarding the provision of more affordable housing than the required share of affordable units, or rewarding developments incorporating such provisions as "accessibility" and "visitability." These measures will build on the city's efforts to further support housing choice in Newton.

The city will continue to seek additional regulatory changes over the next few years through its Zoning Redesign Project. Zoning Redesign was initiated in 2011 and Phase One of the project was completed in 2015. The initial phase successfully reorganized the existing ordinance, making it easier to understand and interpret.

Phase Two of the Zoning Redesign Project will create a new, context-based zoning ordinance that provides guidance and rules for the development and redevelopment of land in Newton. Context-based means the new zoning will sustain the city's existing development forms, reflect the building patterns of Newton's different neighborhoods and village centers, and allow new

growth to occur in appropriate places and at appropriate scales. The Zoning Redesign Project intends to bring more predictability to land use regulation and the permitting process.

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

- Expansion of the Homeowner Rehabilitation Program

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

- Fair Housing

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

- The City, as representative member of the WestMetro HOME Consortium, selected a consultant to develop the Consortium’s new FY21 – FY25 Analysis of Impediments to Fair Housing Choice (AI). Since it will address fair housing barriers throughout all of the 13 member communities in the Consortium, it will help Newton identify actions, policies, or decisions that have or may restrict an individual’s housing choice on account of race, color, religion, gender, gender identity and expression, disability, familial status, national origin, ancestry, age, marital status, source of income, sexual orientation, veteran/military status and genetic information. In addition, the AI must address any identified barriers to facilitate inclusive, equitable communities that provide free and open access to housing and opportunity. The final AI will culminate in meaningful action steps that Newton and the Consortium may take to overcome identified fair housing barriers, coinciding with timetables for implementing new practices with measurable results.
- The city continues to advance the redesign of its current zoning ordinance, the most comprehensive revision to its zoning in decades. Division staff and the Fair Housing

Committee (FHC) will actively ensure that proposed zoning changes support the city's goal to affirmatively further fair housing and avoid creating disparate impacts to protected classes.

- The city seeks to ensure that consideration of fair housing goes beyond regulatory minimums in order to implement the city's documented fair housing development goals and objectives. The Fair Housing Committee assisted the city in developing the Fair Housing Project Consideration Tool for staff to utilize during project review. The tool goes beyond the reach of regulatory measures as city staff evaluate applicable housing development projects for consistency with fair housing goals and policies as outlined in the FY21-25 Consolidated Plan. All evaluations will result in a statement that "the objectives of the city's Consolidated Plan, including fair housing, have been considered in this review."
- Information designed to guide the public and developers on the process for developing affordable housing and Comprehensive Permit projects in Newton will continue to be available on the Planning and Development Department website. The webpage details the city's fair housing policy and obligation to affirmatively further fair housing.
- The city's Fair Housing Statement is posted on its website. This Statement is also available in written documents through city departments, venues, sponsored events, activities targeting abutters of pending development, and zoning related actions affecting housing. At community meetings related to pending housing developments, the city will continue to inform the public of the city's responsibility to affirmatively further fair housing, disseminating in writing, the City of Newton's Fair Housing Statement. The city will include the US Department of Housing & Urban Development's (HUD) Fair Housing logo on all pertinent housing documents.
- The city and FHC will continue efforts to plan for informative and meaningful fair housing programming, striving for a minimum of one event and one outreach campaign annually. Training will be provided on an annual basis to city councilors, city staff, community partners, the general public and others involved in activity related to the provision of housing. Presentations may include a variety of topics such as disparate impact and fair housing principles. Additional events and outreach will be undertaken if circumstances support these efforts.
- The city's fair housing complaint process is driven by the Newton Human Rights Commission. The Human Rights Commission is authorized under the City of Newton Ordinance to consider claims of discrimination related to housing in Newton that are filed within 300 days of occurrence. The Commission acts as a neutral party which receives and investigates complaints, and ensures proper referrals, if necessary. Complaints can be filed to the Commission in person, through an online discrimination reporting tool, or in written form. The city, and Division staff are working to improve and streamline this tool for increased accessibility, once finalized, city staff and the FHC

will promote this resource, particularly to individuals and families of protected classes, in an effort to report and stem potentially discriminatory actions. Division staff will also encourage nonprofit housing providers to report similar acts of discrimination and enforce responsiveness consistent with city policies to address discriminatory matters.

- Additionally, the city progresses on efforts to create nine units of restricted permanent supportive housing for chronically homeless adults with disabilities. The priority parcel, 160 R Stanton Street successfully underwent the city's disposition and procurement process. The developer, 2Life Communities, formerly Jewish Community Housing for the Elderly, conducted an extensive public engagement process to expand the 199 units of affordable senior housing at Golda Meir with 68 new affordable rental units. The project received its Comprehensive (40B) Permit and has been awarded LIHTC from the Commonwealth of Massachusetts and a Section 202 award from HUD. Construction is slated to commence in the Fall of 2020.

Waltham is seeking to create a Local Voucher Program through the Waltham Housing Authority, funded with Community Preservation funds, that sets rent limits at 20% above fair market rates. The City will continue to operate the HOME-funded Tenant Based Rental Assistance rental subsidy and security deposit programs, to transition low-income households into stable housing. Waltham recently amended the Affordable Housing Zoning Ordinance in 2019 to stipulate that 15% of affordable units be affordable for households at 60% of the Area Median Income. Finally, the City will continue to support the creation of affordable housing, including project rehabilitation work on four buildings that will increase the community's affordable rental and homeowner housing stock.

Watertown has a very strong inclusionary zoning ordinance which has yielded approximately 30 affordable units each year since 2014. However, these units are primarily not serving low-income or extremely low-income households. The Town will rely on its nonprofit partners to identify new construction and redevelopment opportunities in order to create housing for lower-income households.

SP-60 Homelessness Strategy – 91.215(d)

- 1. Describe how the Strategic Plan goals contribute to:**
 - a. Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs:**

Annually, the City of Newton convenes the local providers of the former BNWW CoC and representatives from the BoS CoC to discuss the needs of the homeless population and how ESG funds can be best allocated to address those needs.

In FY16 (FFY15) and FY17 (FFY16), the City of Newton awarded ESG funds to two nonprofit organizations, Community Day Center of Waltham (CDCW) and Brookline Community Mental Health Center, for their Street Outreach program. The goal was to engage unsheltered homeless individuals and families and to connect them to emergency shelters, housing or critical services, and non-facility-based care for those unwilling or unable to access appropriate housing. The organizations collectively served 42 individuals during the FY16 and FY17 program year. Subsequently, in FY18 (FFY17) the City did not receive ESG proposals for street outreach, and funds were re-allocated towards other ESG components, including emergency shelter, homelessness prevention, and rapid re-housing.

While there is no street outreach program currently funded under ESG, the City of Newton and neighboring communities have built a strong network of local providers to collaborate and ensure unsheltered individuals and families are engaged and connected to the services that they need. According to the BoS CoC's 2019 PITC, 45 unsheltered homeless individuals were counted in the City of Waltham alone. As a result, the City of Newton will continue to partner with CDCW to engage these unsheltered individuals. As previously noted, the CDCW is an ESG subrecipient who provides a gathering space for individuals to receive a hot lunch, basic hygienic and medical needs, access to computers, case management, counseling, and referrals to detox facilities and other appropriate service providers.

In addition, the City of Waltham's Public Health Department recently hired a social worker and substance abuse counselor to specifically target street outreach efforts within the community. The combined efforts made between the City of Waltham Public Health and Housing Departments, the Waltham Police Homeless Task Force, and the Community Day Center of Waltham provide outreach and an assessment of the needs of the homeless population, including unsheltered persons. The Waltham Homeless Coalition, spearheaded by the police department, convenes monthly to share resources that are aimed at helping Waltham homeless persons. Annually, The City of Waltham allocates \$100,000 for a winter Warming Center for unsheltered homeless from December through March that cannot qualify for Massachusetts Housing & Shelter Alliance (MHSA) services due to substance abuse and or criminal activity. The Waltham Police Homeless Task Force works to build trust with homeless persons, performs assessments in the field and links them to shelter and supportive services that meet their needs. The shelters administered by MHSA in Waltham provide overnight

shelter, meals and bathroom/shower facilities while engaging homeless persons in case management to work towards permanent housing.

Needham will continue to refer anyone looking for an emergency shelter to appropriate locations such as shelters located in nearby municipalities. The Town's community housing specialist can provide additional support in answering inquiries and providing important information and referrals. The Needham Housing Authority will also continue to assist people who may be homeless or at risk of homelessness in their search for affordable housing opportunities and support services, prioritizing these households for occupancy in its developments.

b. Addressing the emergency and transitional housing needs of homeless persons:

In FY19 (FFY18), the City of Newton provided \$63,000 of ESG funding to support three (3) emergency shelters, one (1) transitional shelter, and one (1) day center serving homeless individuals in the BNWW region. Funds were awarded to The Second Step, REACH Beyond Domestic Violence, Middlesex Human Service Agency, and Community Day Center of Waltham.

The Second Step, located in Newton, provides transitional housing and direct services to individuals and their families who are survivors of domestic violence. The Second Step's transitional housing is a 24-month program. However, a majority of individuals and families move out of the shelter before the 24-month mark due to The Second Step's extensive case management and support. Over the years, the average stay has shortened from 23 months to 17 months.

REACH Beyond Domestic Violence, Middlesex Human Service Agency, and Community Day Center of Waltham are all located in Waltham. REACH Beyond Domestic Violence offers emergency shelter and direct services to individuals and families who are survivors of domestic violence and often partners with The Second Step to provide further assistance. Middlesex Human Service Agency offers emergency shelter to homeless individuals up to 90 days and partners with the Community Day Center of Waltham, who offers a hot lunch, basic hygienic and medical needs, computers, case management, counseling, and referrals to detox facilities and other appropriate service providers.

In addition, though not funded by ESG, the Citizen for Affordable Housing in Newton Development Organization, Inc. (CAN-DO) offers ten units of transitional housing for individuals and their families who are survivors of domestic violence. The Second Step and CAN-DO both work with the Newton Housing Authority, and other housing providers, to assist survivors' transition into safe permanent housing in the community.

The City of Newton will continue to target a percentage of its ESG funds to support the emergency shelter program and assist ESG subrecipients through the Coordinated Entry process to actively move homeless individuals and families into permanent housing.

The Natick Affordable Housing Trust established an Emergency Homeless Voucher program for those homeless who are on the streets during inclement weather and need shelter. The voucher program provides for several nights of housing in a local hotel with the condition the individual seek assistance from the Natick Service Council. The recipients of the voucher are usually picked up and assisted first by the Natick Police, who gather information, run a background check, notify Natick Service Council, and provide a ride and the voucher to a local motel. The Service Council will pick up the voucher recipient the next day for further assistance.

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

- c. 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.:**

In July 2019, the City of Newton's City Council passed the updated Inclusionary Zoning Ordinance, which includes the Extremely Low-Income (ELI) Alternative Compliance Option. The ELI option allows a developer to seek a special permit to reduce its total percentage of required Inclusionary Units. Under the new Inclusionary Zoning Ordinance, any project that includes the construction of twenty-one (21) or more new rental units must set aside 17.5% of its total units as affordable units (including 2.5% middle-income units). However, the developer may seek a special permit to alternatively set aside 12.5% of its total units as affordable units under the ELI option.

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

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

Extremely Low-Income Alternative Compliance Option: Number of Inclusionary Units Required

Tier Level	21+ UNITS
ELI Tier: 30% AMI	2.5%
Tier 1: 50%-80% AMI	7.5%
Tier 2: 110% AMI	2.5%
Total	12.5%

Source: City of Newton’s Zoning Ordinance, Chapter 30

The Natick Affordable Housing Trust has been meeting with Family Promise, a regional transitional housing organization, for the last year. Both organizations have been reviewing means in which the Housing Trust can assist Family Promise to provide rental assistance or rental units for Family Promise clients, primarily homeless families in need of transitional housing. The Housing Trust is also reviewing the possibility of using HOME funds for Tenant Based Rental Assistance that could be provided to several income levels, including those families transitioning from homeless assistance to more independent living.

Needham will promote mixed-income housing development to serve the range of needs for assisted housing. This will likely include several income tiers in new rental developments, including units for those earning at extremely low and very low-income levels and thus affordable to those who may be homeless or at risk of becoming homeless.

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

The Waltham Housing Department continues to administer the Municipal Housing Trust Emergency Assistance fund to provide financial support for those who may be facing eviction due to non-payment of rent and or rent arrears. The Housing Department also coordinates with the Department of Transitional Assistance for Residential Assistance for Families in Transition (RAFT) funding to maximize the amount needed to obtain permanent housing with security deposit payments, first and last month rent payments and moving expenses. Removing the barrier of the upfront costs needed to obtain permanent housing continues to be an ongoing need for Waltham citizens.

- d. Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that**

address housing, health, social services, employment, education or youth needs:

Since FY16 (FFY17), the City of Newton has increasingly targeted its ESG allocation towards homelessness prevention programs, from 23% to 37%. The funds are intended to prevent low-income individuals and families from moving into emergency shelters or living in a public or private place not meant for human habilitation. Funds can be utilized for rental assistance (short- or medium-term rental assistance), financial assistance (application fees, security deposits, last month's rent, utility deposits, or moving costs), or service costs (housing search and placement, legal services, or credit repair). The City of Newton will continue to target its ESG funds towards homelessness prevention programs and collaborate with the McKinney Vento Liaison to ensure low-income individuals and families are receiving the support that they need to avoid homelessness.

Furthermore, the City will continue to facilitate referrals between ESG providers to non-ESG providers to ensure resources are available to all in the jurisdiction. In FY20, the City held the first of many brown bag sessions to convene local providers of the Public Service and ESG program. These brown bag sessions allowed local providers to connect with one each and to coordinate efforts as much as possible.

The Natick Service Council helps low income families, including eviction prevention services, emergency utility assistance, and financial assistance for school, camp, and other children programs. The Housing Trust is also reviewing the option of using HOME funds for Tenant Based Rental Assistance that could be provided to several income levels including those families transitioning from homeless assistance to more independent living.

The City of Waltham HOME Tenant Based Rental Assistance full rental assistance program provides monthly subsidy rent payments to individuals, at risk elderly, battered families with referrals from local social service agencies, such as the Community Day Center, Newton Wellesley Hospital, the Council on Aging and the Waltham Housing Authority. The Municipal Housing Trust Emergency Assistance Fund assists households in Waltham who are at risk or may be near homeless. Households facing eviction who need assistance with rent arrears and can continue to pay rent moving forward can apply for funding that prevents eviction and keeps them permanently housed. The Housing Department coordinates with the Department of Transitional Assistance to help facilitate emergency Residential Assistance for Families in Transition (RAFT) funding to be used in conjunction with Waltham funds for households with dire circumstances.

SP-65 Lead based paint Hazards – 91.215(i)

- 1. Outline the actions proposed or being taken to address LBP hazards and increase access to housing without LBP hazards, and how the plan for reduction will be integrated into housing policies and programs:**

Rental housing supplies the majority of the units that are affordable to lower income households in the Consortium (*Needs Assessment Housing Affordability Table*). Housing stock in the Consortium is predominantly older, and 78% of rental units were built prior to 1980. These homes have the potential to contain lead paint, which was not banned until 1978. There is a significant chance that low to moderate income renters may live in older, poorly maintained buildings, which increases the risks associated with lead paint. Many of the Consortium communities refer residents to MassHousing's Get the Lead Out program, which offers deferred or low-interest loans for lead remediation. New affordable construction in the Consortium is free from lead paint.

Lead-based paint and other hazards are managed by the Brookline's Health Department Division of Environmental Health. Lead hazards are treated as a violation to State Sanitary Code, and the Division implements regulations and requirements for lead removal, abatement and containment. The Massachusetts Lead Laws are followed, and contractors are required to comply with State's requirements of safe practices for renovation and lead abatement. The City refers constituents in need of lead abatement to Mass Housing agencies in charge of administering the Get the Lead Out Program, such as Urban Edge. Households with a child under 6 years of age can request an inspection by the Brookline Health Department. In Brookline projects funded with CDBG and HOME funds, the environmental review analysis will disclose the presence of toxic substances such as lead and asbestos, and in many cases, it discloses to the public a mitigation plan if the new construction or rehabilitation of housing may involve dealing with such toxic substances.

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

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

While Needham has a Health Department staff person who has a Lead Determinator License from the state, the Town rarely receives complaints about the existence of lead-based paint in homes and typically refers complaints to the MA Lead Poisoning Prevention Program/Childhood

Lead Poisoning Prevention Program. The Town also provides information to residents on lead-based paint issues through a section on the Town's housing website, a housing brochure, and referrals to the state's "Get the Lead Out" Program for financial assistance on lead-based paint removal. Moreover, as part of the demolition permitting process, the Town requires that all builders hire a water truck to be present on site throughout the demolition process to spray down any dust plumes that may occur to prevent potential airborne hazards from migrating onto other neighboring properties.

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

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

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

The Waltham Housing Department administers the CDBG-funded lead paint program to income eligible homeowners and or to landlords who have low to moderate income tenants. Owners or tenants must be within the HUD income guideline at or below 80% of the AMI. If owners and/or tenants are above the income requirements they are referred to Mass Housing Loan programs. Even with resources for remediation, landlords can carry a significant financial burden for lead removal, which makes them less likely to address the issue. In addition, federal and state support for lead removal is limited and conditional; not every house receives federal or state funds for full abatement.

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

2. How are the actions listed above related to the extent of lead poisoning and hazards?

As described in the Market Analysis, the Massachusetts Lead Poisoning Prevention and Control Regulation requires all children to be screened for lead poisoning multiple times through the age of three. Children must be screened once more at age 4 if they live in a high risk community or in a high risk environment (other lead poisoned children in the same home, or a home built prior to 1978 that is under renovation). According to the data generated by the Massachusetts Department of Health, there were instances of childhood lead poisoning in seven Consortium communities. Although these incidences are few, they reinforce the need for education on lead poisoning prevention and further lead remediation of rental and homeowner housing.

Federally-funded housing rehabilitation programs in Framingham, Newton, and Waltham address the safe remediation of lead hazards. Other consortium communities refer residents to MassHousing's Get the Lead Out program, which offers deferred or low-interest loans for lead remediation. Lead hazard education is integrated into the application process for housing rehabilitation and tenant based rental assistance program applicants. Printed brochures and information on municipal websites in the Consortium also offer another means of educating residents about the dangers of lead. All HOME projects comply with applicable lead laws and regulations, and any new affordable construction in the Consortium contributes to the region's lead-free housing stock.

3. How are the actions listed above integrated into housing policies and procedures:

The Brookline Housing Division will continue to work with Urban Edge (a local community development organization) to refer participants in need to the MassHousing Get the Lead Out program, a low-cost loan program for lead removal. The program provides zero to two percent financing to owners of buildings with one to four units. This includes income-eligible owner occupants and investor/nonprofit owners who serve income-eligible tenants. However, while the Division refers participants to Urban Edge, the usefulness of this program in Brookline is limited because a high proportion of condominium and rental units are in relatively large buildings where access to common area testing and abatement may be more complicated.

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

The Framingham Community Development Department has incorporated lead abatement activities into its rehabilitation to specifically address lead paint hazards. The City's Housing Rehabilitation program requires lead paint testing and abatement in CDBG and HOME funded rehabilitation funded activities.

The Town of Needham experiences a considerable amount of demolition activity with almost all

new single-family construction involving smaller and older homes being replaced by larger more expensive ones. Consequently, the required spraying during the demolition period represents a significant preventative measure for reducing lead-based paint hazards in the community. Additionally, the Town added information on lead-based paint issues on the housing section of the Planning Department website, including local, regional and state resources for removal.

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

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

In accordance with guidelines, the Waltham Planning Department and Housing Division staff distributes the EPA/HUD "Protect Your Family from Lead in Your Home" pamphlet and provides additional information to every rehabilitation loan recipient and TBRA renter household. The information covers the dangers of lead-based paint, symptoms of lead paint poisoning, and instructions on actions if symptoms of lead-based paint poisoning are present. When conditions are found which indicate a potential lead-based paint hazard, appropriate remedial action will be included as part of any HOME project. The City's Lead Paint Policy is addressed in program guidelines and policies for both the City's CDBG and HOME programs.

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

SP-70 Anti-Poverty Strategy – 91.215(j)

1. Describe the jurisdiction’s goals, programs, and policies for reducing the number of poverty-level families. How are the resources being targeted to have an impact for people in poverty? Describe how the number of families in poverty will be reduced as opposed to how families in poverty are provided services.

One of the priorities of the Housing and Community Development Division is to fund programs and services for poverty-level individuals and families. According to the 2010-2014 ACS, the City of Newton had 5.6% of its population living below the poverty level, representing 4,463 individuals. Compared to the 2013-2017 American Community Survey (ACS) 5-Year Estimates, 4.3% of individuals in Newton are living below the poverty level, representing 3,462 individuals. This figure is a 1.3% decrease from prior year’s data. The following is a breakdown of individuals living below the poverty level by age group and the 2018 and 2019 poverty guideline.

Newton Population by Age Group	2013- 2017 ACS Estimate Below Poverty Level	2010-2014 ACS Estimate Below Poverty Level
Under 18 years	752	1,244
18 to 64 years	2,026	2,344
65 years and over	684	875
Total	3,462	4,463

Source: American Census Survey, 5-Year Estimate

Household Size	Poverty Guideline (for 48 Continuous States and the District of Columbia)	
	2018	2019
1	\$12,140	\$12,490
2	\$16,460	\$16,910
3	\$20,780	\$21,330
4	\$25,100	\$25,750
5	\$29,420	\$30,170
6	\$33,740	\$34,590

Household Size	Poverty Guideline (for 48 Continuous States and the District of Columbia)	
	2018	2019
7	\$38,060	\$39,010
8	\$42,380	\$43,430
For each additional person, add	\$4,320	\$4,420

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

Through the Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG), the City of Newton targets its federal funds to support programs that, to the maximum extent possible, service extremely low- and moderate-income persons.

Across the Consortium, there are an estimated 33,413 individuals living below the poverty level (2017 five-year American Community Survey). HOME-funded Tenant Based Rental Assistance and HOME-assisted units hold the potential to transition these individuals out of poverty and prevent other households from slipping below the poverty level. The highest poverty rates in the Consortium are found in Brookline, Framingham, and Waltham. These entitlement communities also provide the maximum allowable CDBG funding for public service activities, which primarily serve low to moderate income persons and households. In many of the smaller Consortium communities, such as Bedford, Concord, Lexington, Sudbury and Wayland, the housing authorities are the primary resource for assisting poverty-level households.

2. Describe the jurisdiction's coordination of goals, programs, and policies for reducing the number of poverty-level families with the affordable housing plan.

The City of Newton's CDBG Public Services and ESG program will continue to provide grants to support a number of programs that are intended to serve poverty-level and low-income households in Newton and the surrounding communities, including Brookline, Waltham, and Watertown. City will continue to facilitate referrals between ESG providers and Public Service providers to ensure resources are available to all in the jurisdiction. In FY20, the City held the first of many brown bag sessions to convene local providers of the Public Service and ESG program. These brown bag sessions allowed local providers to connect with one another, learn about existing and new resources, and coordinate efforts as much as possible, especially among shared clients.

Brookline combines multiple strategies to help reduce the number of poverty-level families. Over the next five years, the Town aims to decrease the cost burden of affordable housing; maintain services and programs in job/training/employment; provide greater support of food banks; encourage and support the integration of services and programs which bring progress toward self-sufficiency; support Section 3 programs of the housing authority and developers of affordable housing developments; and support services directly or indirectly which increase household incomes. The Town will continue to reduce poverty by funding and supporting such programs as the:

- Steps to Success Program – This program provides low-income youth with a comprehensive support network designed to achieve college graduation and meaningful training leading to employment.
- Next Steps Program – This program provides job search assistance and professional life-skills development for adults living in the Town of Brookline, particularly those residing in the Brookline Housing Authority
- Brookline English Speakers of Other Languages (ESOL) Program – This program, housed at the Brookline Housing Authority, provides English language training to many new immigrants to assist in improving their language skills to enter the workforce.
- The Brookline Community Mental Health Center – This organization through individual counseling and group programs, works with adults, children, adolescents and families in dealing with crisis, substance abuse, domestic abuse, mental illness, anger management and financial literacy.

Federal funds in Framingham support Tenant Based Rental Assistance, job training and education programs which are aimed at moving individuals and families out of poverty. The English as a Second Language Plus program provides free English language instruction, life skills training, and GED prep. Pearl Street Cupboard & Café offers food assistance to low and moderate income residents through groceries and hot meals five days a week. After school programs for youth age 14 through 21 years of age are part of the Healthy Options for Progress, to youth at the Pelham Apartments, an affordable housing complex. This program also provides economic, health and social support to residents of Pelham Apartments. The City allocates the

maximum allowable CDBG funds to public services and uses HOME funds to increase affordable housing stock in the community.

The City of Waltham will continue to employ the following strategies to reduce the numbers in poverty:

- Promote sustainable economic development through affordable housing and other community development activities;
- Maintain relationships with the Council on Aging, the Community Day Center and MHSA Shelter System to enhance and promote the stabilization of the elderly, frail elderly, and homeless and assist in the transition to permanent housing situations;
- Assist households in obtaining permanent housing with the HOME Tenant Based Rental Assistance security deposit and rental assistance program, developing stability reducing the likelihood for poverty;
- Prioritize projects, in part, on the basis of their ability to foster self-sufficiency;
- Promote efforts to educate city residents about available supportive services that foster self-sufficiency;
- Encourage job training and placement referral service to low and moderate income residents;
- Provide emergency utility assistance to income eligible households in financial stress providing weatherization and urgently needed home repairs;
- Provide emergency assistance rental arrears payments to income eligible households to prevent eviction.

The remainder of the communities in the Consortium (Belmont, Bedford, Concord, Lexington, Natick, Needham, Sudbury, Watertown, and Wayland) will use HOME funds to reduce individuals and families living below the poverty level through the production and preservation of affordable housing, in partnership with local housing authorities and developers. In Natick, the Affordable Housing Trust works in conjunction with the Natick Service Council, in addition to the Natick Housing Authority, to support housing and services for the Town's lowest income residents. Needham will primarily focus on rental unit development that targets several income tiers, including households earning at or below 30% of area median income. Bedford and Natick will also utilize HOME funds to operate Tenant Based Rental Assistance programs.

SP-80 Monitoring – 91.230

- 1. Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements:**

Newton Public Services/Human Services and Emergency Solutions Grant Monitoring Program:

Annually, during the third quarter of each program year, Division staff monitors human service and ESG subrecipient agencies. At least ten percent of all human service projects and ESG projects are monitored each year. Incorporated into the monitoring process is a review of the subrecipients' compliance with requirements of the programs, including those related to civil rights and minority business outreach.

All new projects are monitored during the first year of operation. Existing agencies/projects are selected based on the results of a risk analysis. This analysis considers such criteria as past performance of the agency/project, the timing of an agency's last monitoring visit, whether a project is new, staff turnover, previous concerns and necessary follow-up, inconsistent reporting or requisitioning, and the agencies' ability to meet projected outputs and outcomes over the course of the program year. Incorporated into the monitoring process is

The monitoring process includes the following documentation:

- Risk analysis results and monitoring schedule,
- Notification letter sent to subrecipient agency,
- On-site monitoring visit documentation, including completion of steps outlined in the attached monitoring agenda, and
- Letter to the agency that outlines the result of the monitoring visit, including any follow-up action required. All monitoring documentation shall be filed in the "monitoring" folder within the project file.

Newton HOME/CDBG Housing Development Projects Monitoring Program:

Each year, housing staff is responsible for ensuring that federally-funded affordable housing development projects maintain their regulatory and statutory compliance. Staff monitors every rental project assisted with HOME funds on an annual basis and does an on-site file review of CDBG-funded projects biennially. Except for HOME projects, staff does not conduct on-site file reviews of projects monitored by MassHousing, the MA Department of Housing and Community Development or other approved monitoring agencies. In these cases, staff contacts property managers or owners to verify that an annual monitoring was conducted and requests written results of the monitoring visit.

In general, the monitoring process includes the following steps:

- Perform risk analysis if project is CDBG-funded and is not scheduled to be monitored. The risk analysis considers criteria such as past performance of the agency/project, experience level of staff administering the project, project-specific factors such as number of units and funding sources, and program complexity;
- Develop monitoring schedule based on risk analysis and if a project is funded with HOME or CDBG funds;
- Send notification letter notifying owner that units will be monitored for CDBG/HOME compliance and compliance with sub-recipient agreement. The letter identifies the date and time of the monitoring visit and identifies specific items to be monitored (i.e. income limit documentation, lease agreements, unit inspection results, performance goals, if applicable, etc.);
- Complete on-site monitoring visit including completion of the following forms, as applicable: Lease Requirements Checklist, Housing Quality Standards inspection form, and CDBG or HOME Checklist Monitoring Form, including compliance with timely expenditure of funds, comprehensive planning, civil rights, and minority business outreach as applicable;
- Send letter to the owner outlining the result of the monitoring visit including any follow-up action required.

WestMetro HOME Consortium Monitoring Program:

The City of Newton is the lead entity of the 13-member WestMetro HOME Consortium. The twelve Consortium communities are monitored by City of Newton staff, and additionally, each of the HOME Communities monitors locally funded HOME projects.

During the third quarter of every year, Newton staff monitor every member community for compliance with the HOME Rule. The specific projects identified for monitoring by Newton staff are based on a risk analysis required by HOME and conducted by Newton.

Prior to being monitored, each member community must make sure that all required records, agreements and other documents are in the appropriate files. The applicable HUD checklist for each project to be monitored is provided to the member community in advance of the monitoring visit.

Completed rental projects are monitored for ongoing compliance with rent and income eligibility of resident households (including income documentation). The new HOME Rule also requires a financial review for projects with 10 or more units. Before Newton staff perform on-site monitoring at the member communities' offices, property owners must submit a cash flow spreadsheet and a financial audit, if available. Finally, Newton staff will confirm that completed rental projects meet Housing Quality Standards (HQS) and that a current HQS is in the project file. In addition to monitoring HOME-assisted projects, Newton staff also review member communities' administrative procedures and policies for HOME compliance.

Brookline's affordable housing projects are monitored on an on-going basis in one of several ways, depending on project type. For affordable rental developments, a deed rider and/or an owner's performance agreement is established at loan closing, outlining the period for which the property is to remain affordable and the household income levels that the project will serve. The Town requires all sub-recipients to provide annual income verification on tenant paid portion for those receiving Section 8 subsidies. All affordable homeownership units have deed restrictions that detail resale or recapture provisions in the case of unit transfer and are monitored annually for primary residence. If any unit is found to not be in compliance, Housing Division staff works with the Town's legal office to initiate resale of the unit to a qualified household. Also, for construction projects, the Town ensures the timely expenditure of HOME funds, as well as compliance with comprehensive planning, and minority business outreach as applicable.

The Regional Housing Service Office undertakes all HOME monitoring in the communities of Bedford, Concord, Lexington and Sudbury. Projects are monitored as required by HOME regulations utilizing all appropriate monitoring forms and coordinating housing quality inspections.

Framingham conducts monitoring reviews to determine whether programs supported by HUD funds are being carried out in accordance with the Consolidated Plan and federal regulations in a timely manner. All monitoring will be carried out on a regular basis (at least once a year, more if necessary) to ensure that statutory and regulatory requirements are being met, including efforts to ensure long-term compliance with housing codes (especially relevant to housing rehabilitation, homebuyer assistance, and housing development activities). Pre- and post-inspections will be carried out by staff of the housing rehabilitation program, who have knowledge of codes and HOME program requirements. The Community Development Department, in cooperation with local sub-grantees will identify significant variances from planned performance targets and compliance deficiencies. Technical assistance will be given where a) required and b) possible and if needed phased corrective action plans will be formulated as required.

Natick will follow the standard monitoring procedures adopted by the WestMetro HOME Consortium for its HOME program.

The Town of Needham has a Community Housing Specialist position within its Planning and Community Development Department. Among other duties, this Housing Specialist is responsible for monitoring HOME-financed housing units as well as some additional units that were created as part of older Chapter 40B developments, where the initial Monitoring Agent was no longer capable or interested in providing these services, and more recently developed rental units through the state's Local Initiative Program (LIP). This Housing Specialist has established a database for all affordable units in Needham and a protocol for undertaking the annual monitoring process. The monitoring will occur at the beginning of each calendar year with formal requests for information sent to the property owners to obtain documentation regarding continued residency, incomes (for rental units) and leases (rental units). Inspections

of HOME-financed units will also be made based on the timeframes established by HOME regulations.

The City of Waltham monitors and evaluates HOME funded projects for compliance with all HOME project requirements, such as property standards, per unit subsidy limits, beneficiary income-eligibility, affordability restrictions, and cross-cutting federal regulations including environmental review, Uniform Relocation Act, and Lead Safe Housing Rule. Upon project completion as applicable to rental and homeownership projects, the City evaluates compliance with long-term affordability requirements. Additionally, Waltham assesses compliance with rent and income restriction, affirmative marketing and fair housing, property condition, principal residency and resale.

Currently the City monitoring responsibilities include the long-term monitoring of rental housing. Rental property owners must submit an annual Rental Compliance Report that is reviewed to monitor compliance with the ongoing income targeting and affordability requirements. Onsite monitoring is also conducted on a periodic basis to verify accuracy of rent and occupancy reports and review onsite records, and inspect units to ensure continued compliance with applicable housing standards. Annual inspections are completed annual for all TBRA assisted projects of rental housing that is occupied by tenants that receive HOME tenant-based rental assistance. The purpose of these inspections is to ensure that the property continues to meet the HOME property standards. In addition, on an annual basis, reverification of tenants receiving tenant-based rental assistance ensures that tenants continues to be income-eligible.

The City of Waltham encourages minority-owned business participation on HOME assisted activities. Executed HOME Agreements with sub-recipients include their obligation to do outreach to minority and women-owned businesses when requesting proposals for activities funded with HOME funds.

The Town of Watertown has a Housing Planner position within its Planning and Community Development Department. Among other duties, this Housing Planner is responsible for monitoring HOME-financed housing units as well as the Inclusionary Zoning affordable units. The Housing Planner has established a database for all affordable units in Watertown and a protocol for undertaking the annual monitoring process. The monitoring will occur at the beginning of each calendar year with formal requests for information sent to the property owners to obtain documentation regarding continued residency, incomes (for rental units) and leases (rental units). Inspections of HOME-financed units will also be made based on the timeframes established by HOME regulations.

APPENDIX

APPENDIX: 2019 HOUSING INVENTORY COUNT

2019 Housing Inventory Count, conducted by the BoS CoC

Project Type	Location	Target Pop. A	Target Pop. B	Total Beds
Transitional Housing	Brookline	Household with Children	NA	14
Transitional Housing	Brookline	Single Male and Female	NA	4
Permanent Housing	Brookline	Household with Children	NA	8
Permanent Housing	Brookline	Household with Children	NA	13
Permanent Housing	Brookline	Household with Children	NA	30
Permanent Supportive Housing	Brookline	Single Male and Female	NA	4
Permanent Supportive Housing	Brookline	Single Male and Female	NA	24
Permanent Housing	Brookline	Household with Children	NA	16
Permanent Supportive Housing	Brookline	Single Male and Female	NA	5
Permanent Housing	Framingham	Household with Children	NA	12
Permanent Housing	Framingham	Household with Children	NA	10
Emergency Shelter	Framingham	Household with Children	NA	15
Permanent Supportive Housing	Framingham	Single Male and Female	NA	10
Permanent Supportive Housing	Framingham	Single Male and Female	NA	66
Emergency Shelter	Framingham	Household with Children	NA	21

Project Type	Location	Target Pop. A	Target Pop. B	Total Beds
Emergency Shelter	Framingham	Household with Children	Survivor of Domestic Violence	11
Permanent Supportive Housing	Framingham	Single Male and Female	NA	24
Permanent Supportive Housing	Framingham	Single Male and Female	HIV	12
Emergency Shelter	Framingham	Household with Children	NA	21
Emergency Shelter	Framingham	Household with Children	NA	21
Emergency Shelter	Framingham	Household with Children	NA	40
Emergency Shelter	Framingham	Household with Children	NA	301
Emergency Shelter	Framingham	Household with Children	NA	47
Emergency Shelter	Framingham	Household with Children	NA	4
Transitional Housing	Framingham	Single Male and Female	NA	2
Emergency Shelter	Lawrence	Household with Children	NA	52
Emergency Shelter	Lawrence	Household with Children	NA	24
Emergency Shelter	Lawrence	Household with Children	NA	32
Emergency Shelter	Lawrence	Household with Children	NA	14
Permanent Supportive Housing	Lawrence	Household with Children	NA	42
Permanent Supportive Housing	Lawrence	Household with Children	HIV	18

Project Type	Location	Target Pop. A	Target Pop. B	Total Beds
Permanent Housing	Lawrence	Single Male and Female	NA	2
Permanent Supportive Housing	Lawrence	Single Male and Female	NA	16
Permanent Supportive Housing	Lawrence	Single Male and Female	NA	10
Permanent Supportive Housing	Lawrence	Single Male and Female	NA	14
Permanent Supportive Housing	Lawrence	Single Male and Female	NA	21
Permanent Housing	Lawrence	Household with Children	NA	2
Transitional Housing	Lawrence	Household with Children	NA	45
Emergency Shelter	Lawrence	Household with Children	NA	39
Transitional Housing	Lawrence	Household with Children	Survivor of Domestic Violence	9
Permanent Supportive Housing	Lawrence	Single Male and Female	NA	18
Emergency Shelter	Lawrence	Single Male and Female	NA	50
Emergency Shelter	Lawrence	Household with Children	Survivor of Domestic Violence	9
Permanent Supportive Housing	Lawrence	Single Male and Female	NA	3
Transitional Housing	Lawrence	Household with Children	Survivor of Domestic Violence	27

Project Type	Location	Target Pop. A	Target Pop. B	Total Beds
Permanent Supportive Housing	Lawrence	Single Male and Female	NA	10
Transitional Housing	Lawrence	Household with Children	NA	16
Permanent Supportive Housing	Lowell	Household with Children	Survivor of Domestic Violence	19
Emergency Shelter	Lowell	Household with Children	Survivor of Domestic Violence	18
Transitional Housing	Lowell	Household with Children	Survivor of Domestic Violence	24
Permanent Supportive Housing	Lowell	Single Male and Female	NA	12
Permanent Supportive Housing	Lowell	Single Male and Female	NA	12
Emergency Shelter	Lowell	Household with Children	NA	31
Emergency Shelter	Lowell	Household with Children	NA	30
Emergency Shelter	Lowell	Household with Children	NA	60
Emergency Shelter	Lowell	Household with Children	NA	266
Transitional Housing	Lowell	Household with Children	NA	4
Permanent Housing	Lowell	Single Male and Female	NA	23
Permanent Housing	Lowell	Household with Children	NA	101
Emergency Shelter	Lowell	Household with Children	Survivor of Domestic Violence	74

Project Type	Location	Target Pop. A	Target Pop. B	Total Beds
Permanent Supportive Housing	Lowell	Single Male and Female	HIV	8
Emergency Shelter	Lowell	Household with Children	NA	81
Emergency Shelter	Lowell	Household with Children	NA	5
Emergency Shelter	Lowell	Household with Children	NA	15
Emergency Shelter	Lowell	Household with Children	NA	30
Permanent Supportive Housing	Lowell	Household with Children	NA	11
Permanent Supportive Housing	Lowell	Household with Children	NA	2
Permanent Supportive Housing	Lowell	Household with Children	NA	43
Permanent Supportive Housing	Lowell	Household with Children	NA	17
Permanent Supportive Housing	Lowell	Household with Children	NA	58
Transitional Housing	Lowell	Household with Children	NA	6
Emergency Shelter	Lowell	Single Male and Female	NA	90
Emergency Shelter	Lowell	Household with Children	NA	77
Permanent Housing	Lowell	Household with Children	NA	12
Transitional Housing	Lowell	Household with Children	NA	42
Transitional Housing	Lowell	Household with Children	NA	2

Project Type	Location	Target Pop. A	Target Pop. B	Total Beds
Permanent Supportive Housing	Lowell	Household with Children	NA	52
Permanent Housing	Lowell	Household with Children	NA	6
Permanent Supportive Housing	Malden	Single Male and Female	NA	2
Permanent Supportive Housing	Malden	Single Male and Female	NA	11
Emergency Shelter	Malden	Household with Children	NA	46
Permanent Supportive Housing	Malden	Single Male and Female	NA	10
Permanent Supportive Housing	Malden	Single Male and Female	NA	10
Emergency Shelter	Malden	Household with Children	NA	10
Permanent Housing	Malden	Household with Children	NA	47
Emergency Shelter	Malden	Household with Children	NA	92
Permanent Housing	Malden	Household with Children	NA	6
Emergency Shelter	Malden	Household with Children	NA	12
Permanent Supportive Housing	Malden	Single Male and Female	NA	16
Emergency Shelter	Medford	Household with Children	NA	17
Transitional Housing	Medford	Household with Children	NA	4
Permanent Housing	Medford	Household with Children	NA	11

Project Type	Location	Target Pop. A	Target Pop. B	Total Beds
Emergency Shelter	Medford	Household with Children	NA	90
Permanent Supportive Housing	Medford	Household with Children	NA	22
Permanent Housing	Middlesex County	Single Male and Female	NA	10
Permanent Supportive Housing	Middlesex County	Single Male and Female	NA	4
Permanent Supportive Housing	Watertown	Single Male and Female	NA	3
Permanent Supportive Housing	Middlesex County	Single Male and Female	NA	15
Permanent Housing	Middlesex County	Household with Children	NA	376
Permanent Supportive Housing	Middlesex County	Single Male and Female	NA	20
Permanent Supportive Housing	Middlesex County	Single Male and Female	NA	16
Permanent Supportive Housing	Middlesex County	Household with Children	NA	40
Permanent Supportive Housing	Middlesex County	Single Male and Female	HIV	21
Permanent Supportive Housing	Middlesex County	Single Male and Female	NA	10
Permanent Supportive Housing	Middlesex County	Household with Children	NA	18
Emergency Shelter	Middlesex County	Household with Children	NA	75

Project Type	Location	Target Pop. A	Target Pop. B	Total Beds
Emergency Shelter	Middlesex County	Household with Children	NA	28
Permanent Supportive Housing	Middlesex County	Single Male and Female	NA	8
Emergency Shelter	Middlesex County	Household with Children	NA	10
Permanent Supportive Housing	Middlesex County	Single Male and Female	NA	13
Emergency Shelter	Middlesex County	Household with Children	NA	18
Emergency Shelter	Middlesex County	Household with Children	NA	22
Permanent Supportive Housing	Middlesex County	Household with Children	NA	69
Permanent Supportive Housing	Middlesex County	Household with Children	NA	187
Permanent Supportive Housing	Middlesex County	Household with Children	NA	185
Transitional Housing	Middlesex County	Household with Children	NA	36
Permanent Housing	Middlesex County	Household with Children	NA	6
Permanent Supportive Housing	Middlesex County	Single Male and Female	NA	4
Emergency Shelter	Middlesex County	Household with Children	NA	14
Permanent Housing	Middlesex County	Single Male and Female	NA	56
Permanent Housing	Middlesex County	Household with Children	NA	4

Project Type	Location	Target Pop. A	Target Pop. B	Total Beds
Permanent Supportive Housing	Newton	Single Male and Female	NA	6
Permanent Supportive Housing	Newton	Single Male and Female	NA	6
Rapid Re-housing	Newton	Household with Children	NA	1
Transitional Housing	Newton	Household with Children	Survivor of Domestic Violence	10
Permanent Housing	Newton	Household with Children	Survivor of Domestic Violence	9
Transitional Housing	Newton	Household with Children	Survivor of Domestic Violence	33
Transitional Housing	Newton	Household with Children	Survivor of Domestic Violence	27
Permanent Housing	Newton	Single Male	NA	28
Permanent Supportive Housing	Norfolk County	Single Male and Female	NA	11
Emergency Shelter	Norfolk County	Household with Children	NA	28
Permanent Housing	Norfolk County	Household with Children	NA	13
Emergency Shelter	Norfolk County	Household with Children	NA	20
Permanent Supportive Housing	Revere	Single Male and Female	NA	11
Emergency Shelter	Revere	Household with Children	NA	20
Permanent Housing	Revere	Household with Children	NA	18

Project Type	Location	Target Pop. A	Target Pop. B	Total Beds
Permanent Supportive Housing	Revere	Household with Children	NA	46
Emergency Shelter	Revere	Household with Children	NA	42
Emergency Shelter	Revere	Household with Children	NA	40
Permanent Supportive Housing	Revere	Household with Children	NA	18
Permanent Supportive Housing	Revere	Single Male and Female	NA	21
Permanent Supportive Housing	Revere	Single Male and Female	NA	1
Transitional Housing	Suffolk County	Household with Children	NA	1
Permanent Supportive Housing	Suffolk County	Household with Children	Survivor of Domestic Violence	9
Emergency Shelter	Suffolk County	Household with Children	Survivor of Domestic Violence	12
Transitional Housing	Suffolk County	Household with Children	Survivor of Domestic Violence	56
Permanent Supportive Housing	Suffolk County	Single Male and Female	NA	11
Permanent Supportive Housing	Suffolk County	Single Male and Female	NA	15
Permanent Supportive Housing	Suffolk County	Household with Children	NA	10
Permanent Supportive Housing	Waltham	Single Male and Female	NA	3

Project Type	Location	Target Pop. A	Target Pop. B	Total Beds
Emergency Shelter	Waltham	Households with Children	NA	120
Emergency Shelter	Waltham	Single Male	NA	45
Emergency Shelter	Waltham	Single Female	NA	12
Emergency Shelter	Waltham	Households with Children	NA	26
Permanent Supportive Housing	Waltham	Single Male and Female	NA	15
Emergency Shelter	Waltham	Households with Children	Survivor of Domestic Violence	17
			Total	4,874

Source: 2019 Housing Inventory Count, conducted by the BoS CoC

APPENDIX: ANALYSIS OF IMPEDIMENTS STATUS REPORT



Ruthanne Fuller
Mayor

City of Newton, Massachusetts
Department of Planning and Development
1000 Commonwealth Avenue Newton, Massachusetts 02459

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(617) 796-1089
www.newtonma.gov

Barney S. Heath
Director

May 8, 2020

Mr. Robert D. Shumeyko, Director
Office of Community Planning and Development
Thomas P. O'Neill, Jr. Federal Building
10 Causeway Street, Suite 535
Boston, MA 02222-1092

CC: Cynthia Lopez, HUD

RE: Status Update on Development of the WestMetro HOME Consortium's FY2021-2025 Analysis of Impediments to Fair Housing Choice (AI)

Dear Mr. Robert D. Shumeyko,

I am pleased to provide you with the following update related to the development of the WestMetro HOME Consortium's FY21-25 Analysis of Impediments to Fair Housing Choice (AI). The City of Newton and the Consortium members are currently working with consultants Judi Barrett of Barrett Planning Group and Jennifer Goldson of JM Goldson LLC to develop this important plan; however, our efforts have been delayed, as you can imagine, due to the COVID-19 pandemic. In light of these challenging times, this plan remains critically important to Newton and the rest of the WestMetro HOME Consortium and we have adjusted our schedule to ensure an end-product that is detailed, meaningful, and actionable.

On Monday, May 4th, our consultants Judi and Jenn provided a status report to Newton's Planning & Development Board during a Public Hearing on this item. Attached, please find the presentation that they gave that evening. Included in the report was a summary of the community engagement conducted across the Consortium thus far, including:

- A kick-off meeting via Zoom with staff members representing the Consortium communities
- Nine one-hour focus groups conducted over Zoom with stakeholders representing fair housing concerns across the thirteen Consortium communities. Forty-seven people participated, including municipal officials, board/committee members, service providers, and affordable / fair housing advocates.

- An online survey that was open for ten days, sent via email to over 100 stakeholders across the WestMetro communities

Also included in the presentation was a summary of the consultants the key findings thus far, presented through a series of maps that highlighted minority households, poverty, persons with disabilities, and access to quality transit and food throughout the Consortium.

Over the next month-plus, our consultants will continue to draft the written plan and we anticipate presenting the full draft report to the Newton Planning & Development Board in July or August, again allowing for public comment. We hope to submit a final Analysis of Impediments to Fair Housing Choice plan to your office no later than the end of September 2020.

If you have any questions or concerns, please contact me at bheath@newtonma.gov.

Sincerely,

Barney S. Heath

Barney Heath, Director of Planning & Development Department

overview

- **WestMetro HOME Consortium**
 - **Newton Planning & Development**
 - **WestMetro HOME Consortium Advisory Committee**
- **Consultants**
 - **Barrett Planning Group**
 - **JM Goldson**

Fair Housing Code, Chapter 198. 7-B
Be It Ordained By The CITY COUNCIL
of the CITY of CHICAGO; That it shall be
unlawful for any Real Estate Broker To Refuse
to sell, Lease or Rent, any Real Estate for
residential purposes because of
RACE or COLOR.. 

the project

5/4/2020

- **Analysis of Impediments to Fair Housing Choice**
 - Critical piece of affirmatively furthering fair housing certification required of CDBG/HOME grantees
 - Analysis of:
 - Public and private sector policies and programs that affect the supply, price, availability, and access to housing
 - Local and regional social/housing characteristics
 - Public and private sector impediments to housing for groups protected by federal and state fair housing laws
 - Strategies to remove impediments and reduce barriers



definitions

- **Impediments:** actions, omissions, or decisions by jurisdiction that effectively restrict a person's housing choice or the availability of housing choice because of race, color, religion, gender, disability, familial status, or national origin.
- **Barriers:** factors that limit a person's ability to choose from a variety of housing types but may not constitute "housing discrimination." Factors may include housing supply and location, physical accessibility of housing, zoning for group homes, source of income, accessibility of financing, or limited English proficiency.



legal framework

- Title VIII of the Civil Rights Act of 1968: Fair Housing Act (42 USC 45, §§ 3601-3619)
- Section 504, Rehabilitation Act of 1973
- Title I of the Housing and Community Development Act of 1974, Sections 104(b), 109 (42 USC 5304)
- Americans with Disabilities Act of 1990, as amended
- Executive Order 12892: Affirmatively Furthering Fair Housing (1994)
- Executive Order 13217: Community-Based Alternatives for Individuals with Disabilities (2001)
- And other laws, regulations, and policies ...

legal framework: fair housing act

- Race
- Color
- National origin
- Religion
- Sex
- Familial status
- Disability



legal framework: chapter 151B



- Race
- Religion
- Color
- National Origin
- Sex
- Gender Identity
- Sexual Orientation
- Age
- Genetic Information
- Ancestry
- Marital Status
- Veteran or Active Military Status
- Disability
- Familial Status (having children)
- Source of Income (housing assistance)

regional conditions, local roots





summary of engagement

advisory committee | focus groups | survey

focus groups

- Nine one-hour focus groups on Zoom
- Over three weeks in late March and early April 2020.
- Forty-seven people participated: town officials, board/committee members, service providers.
- Participation from all but three: Belmont, Framingham, Natick



Focus Group Highlights

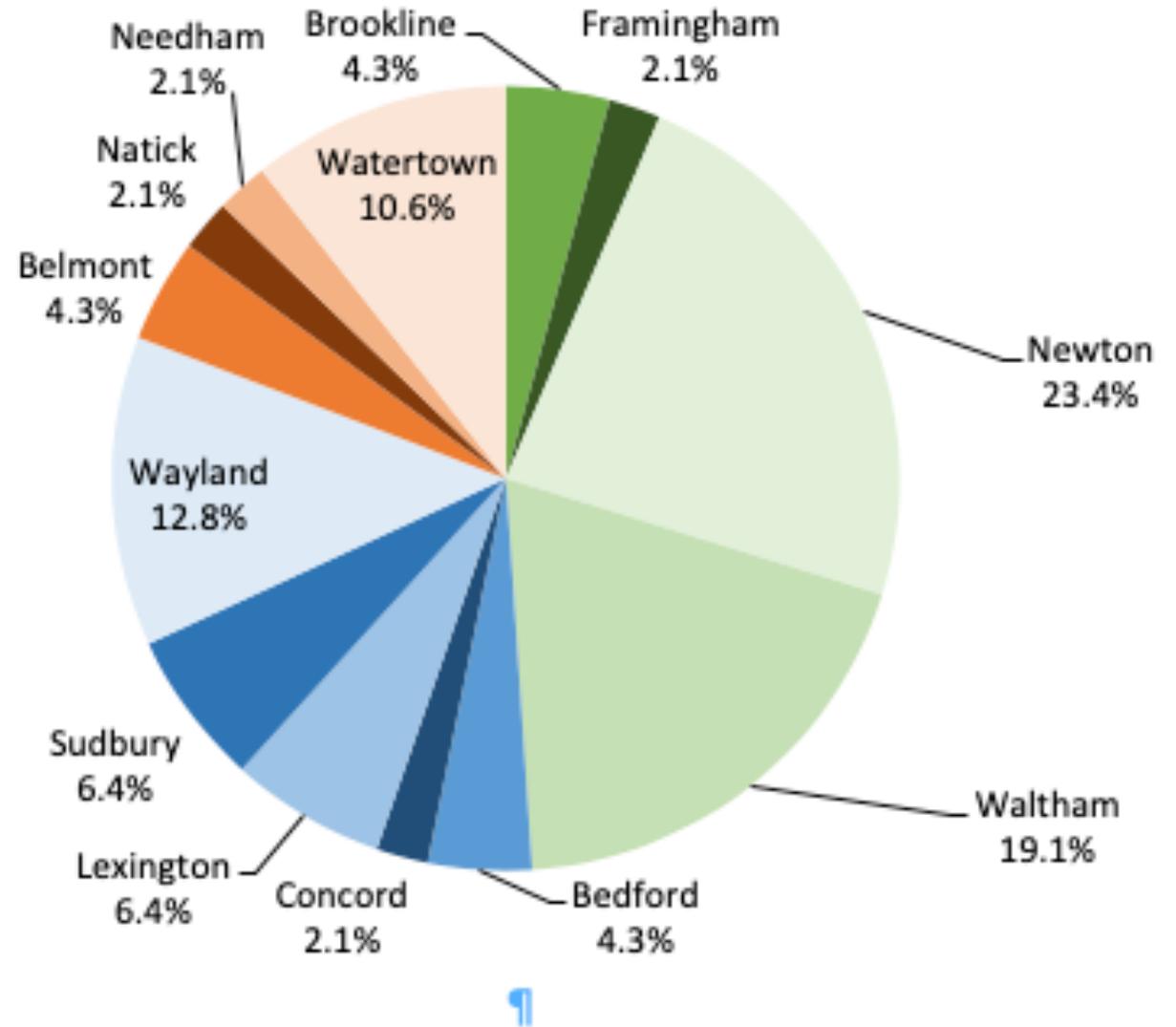
Greatest fair housing + affordable housing needs:

- **Families with children** – larger affordable units for families
- **Seniors looking to downsize** – particularly smaller, single-level, accessible units
- **Households with rental vouchers** – rising housing costs; voucher often doesn't cover enough of the cost
- **Households at or below 50% AMI** – lack of housing options at this level of affordability



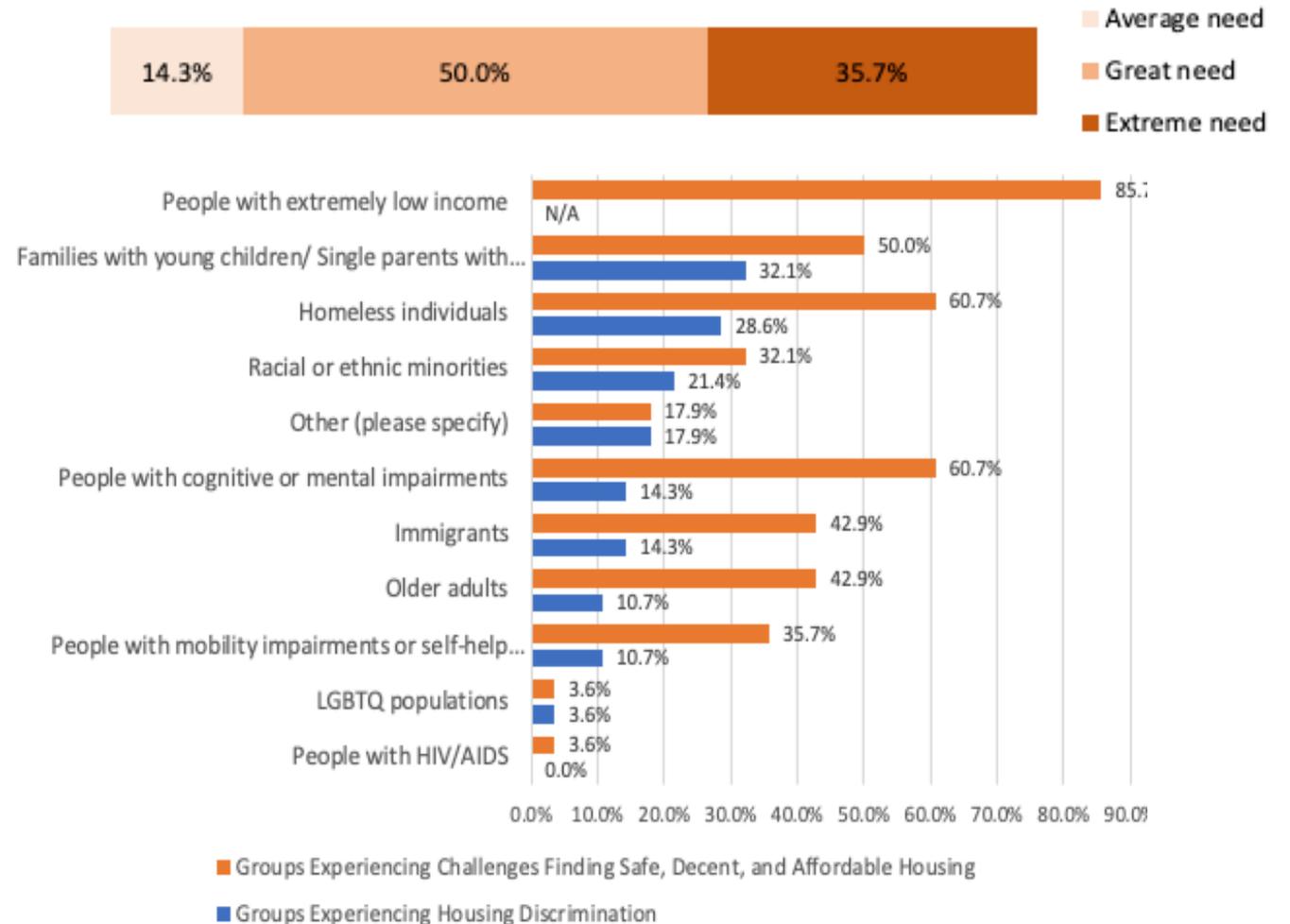
Survey

- 10 days: April 1-10, 2020
- Sent by email to over 100 stakeholders across the 13 WestMetro communities
- 28 responses



Survey Highlights

- **Need** for affordable housing is **great to extreme**
- People with **extremely low income** experiencing greatest challenges
- Greatest challenge: "affordable" housing is **not affordable to the people who need it most**
- Top fair housing concern: **cost and availability of rental housing**



focus group highlights

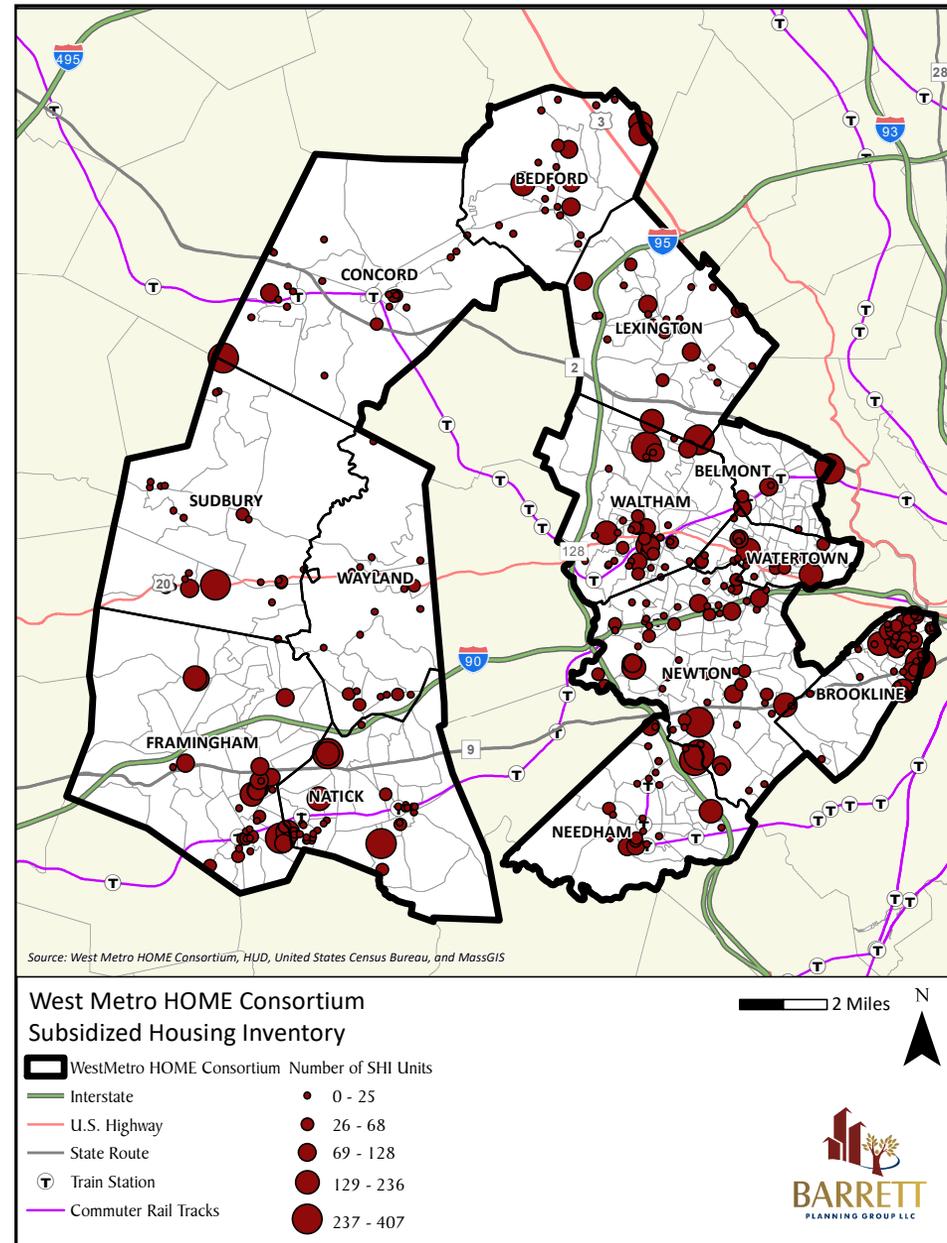
Municipal policies contributing to unequal access

- Zoning favors single-family houses on larger lots
- Weak or no inclusionary zoning
- Public process favors vocal, organized community groups
- Bureaucratic procedures stalling or killing projects due to lost opportunities
- Lack of diversity on board and committees
- Lack of collaboration – both locally and regionally



dimensions of fair housing

historical & policy-driven patterns

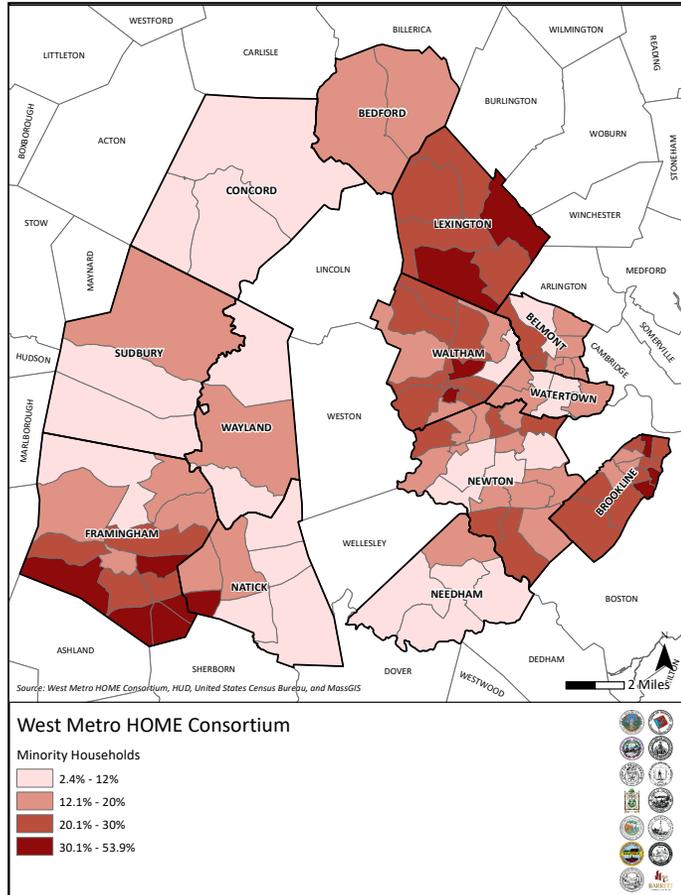


access to quality neighborhoods

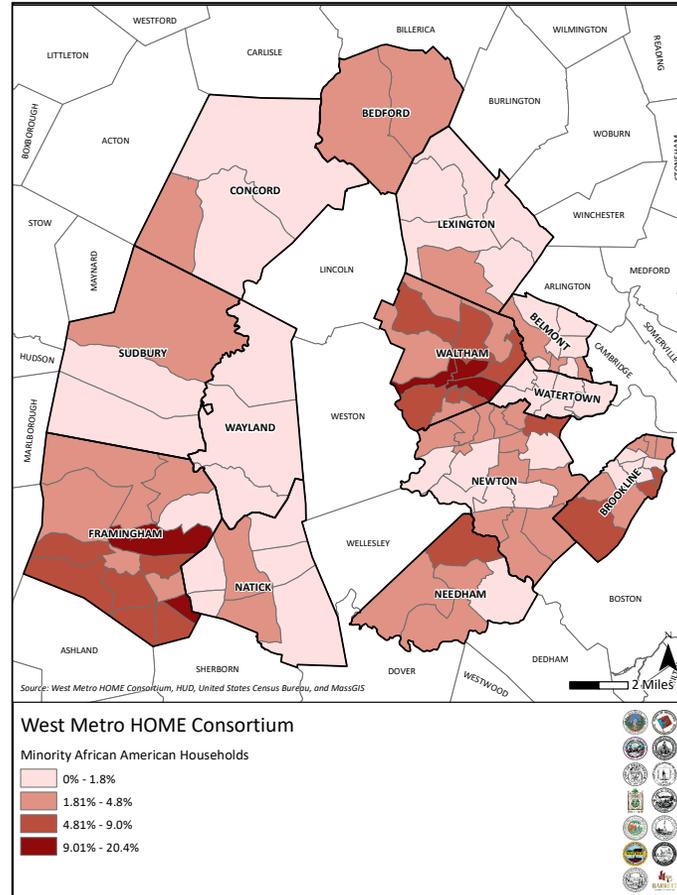
- Good schools
- Jobs
- Goods and services, e.g., retail, personal services, health care, food
- Safe and healthy neighborhoods
- Decent, sanitary, affordable housing
- Neighborhood amenities (such as parks, playgrounds)

Impediments to choice: **discrimination** (people prevented from living where they choose) and **lack of affordability** (people cannot afford housing of their choice).

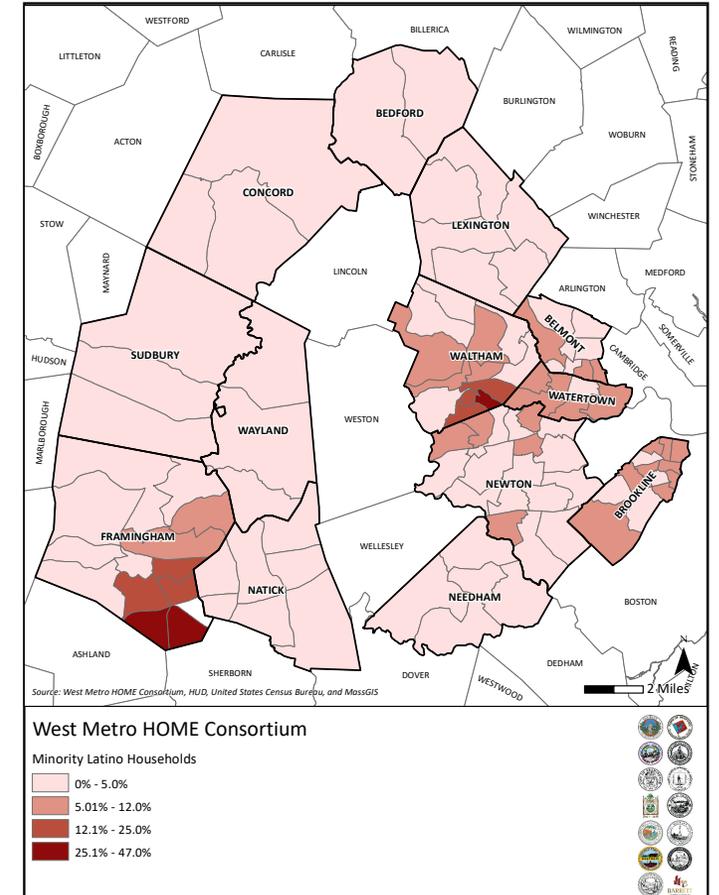
housing choice: minority households



All minority households

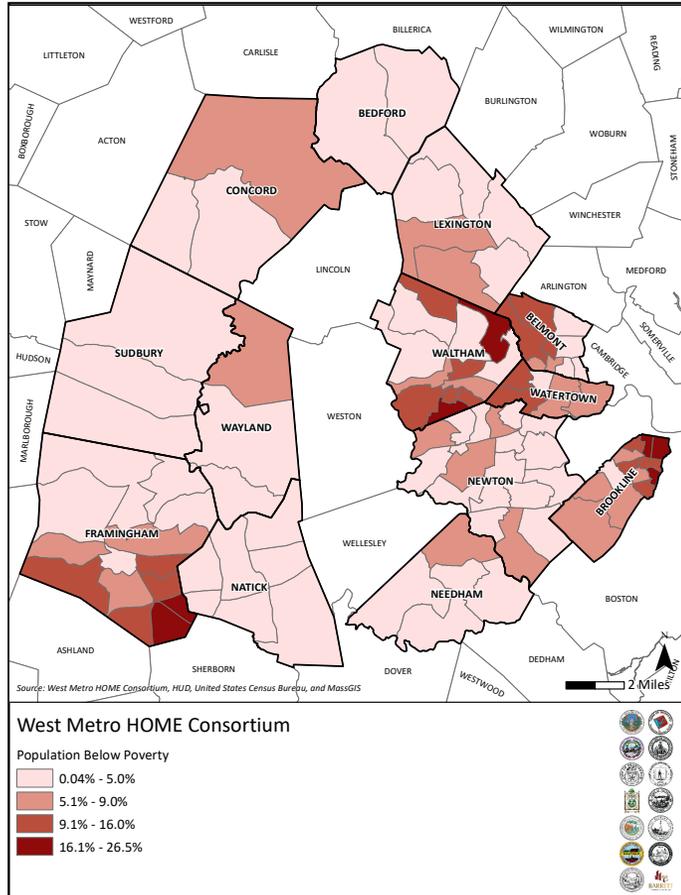


Black/African American households

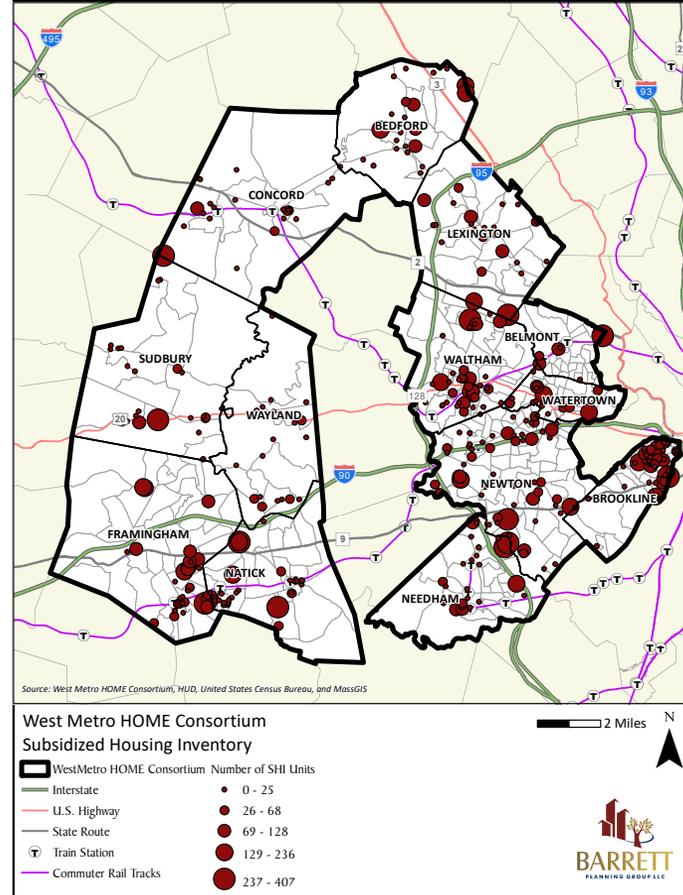


Latino households

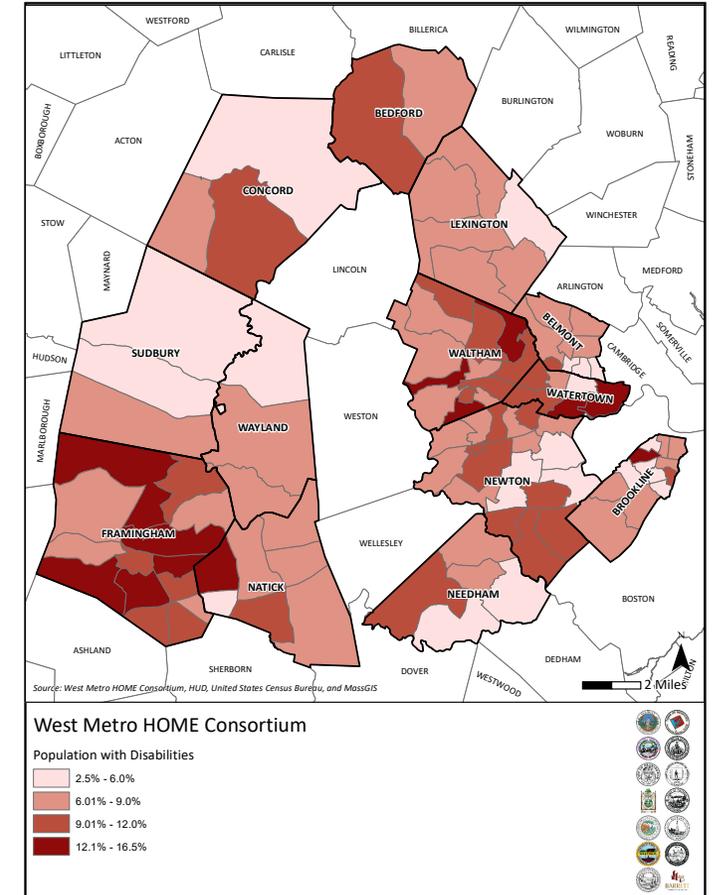
housing choice: income, disability



Poverty



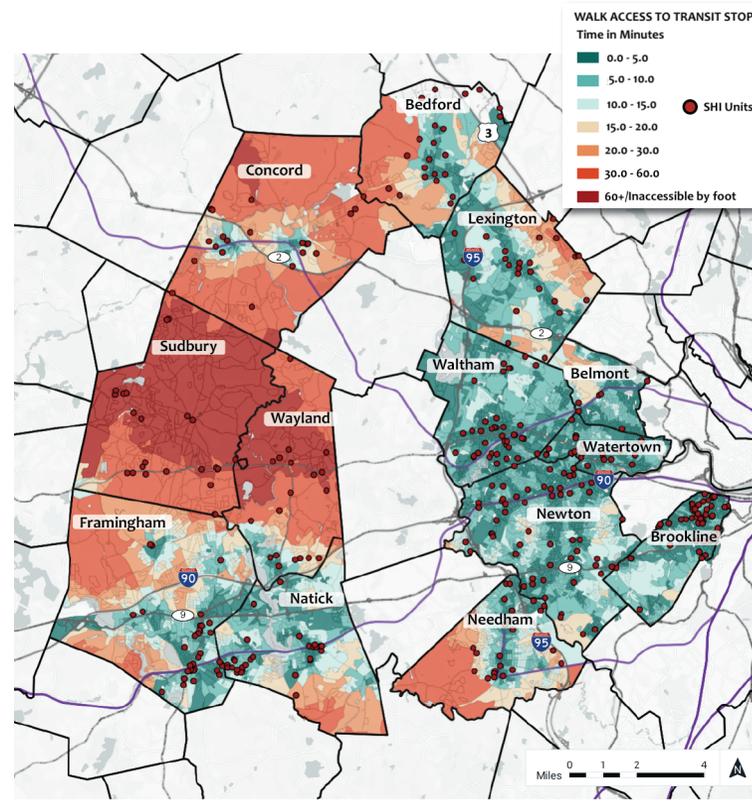
Subsidized Housing



Population with disabilities

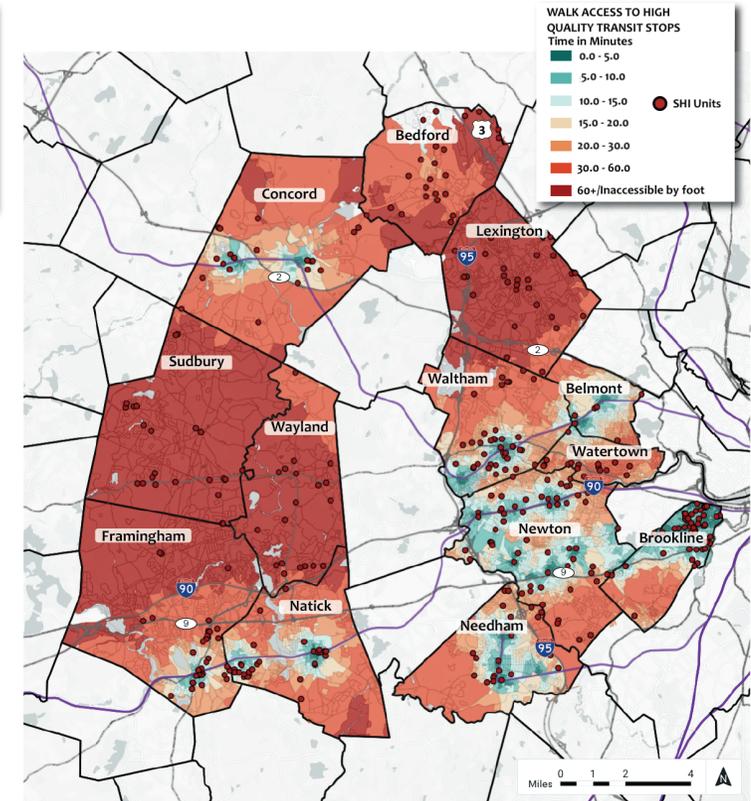
transit access

any transit stop



Source: Urban Footprint Walk and Transit Accessibility Analysis, 2020

high-quality transit stop

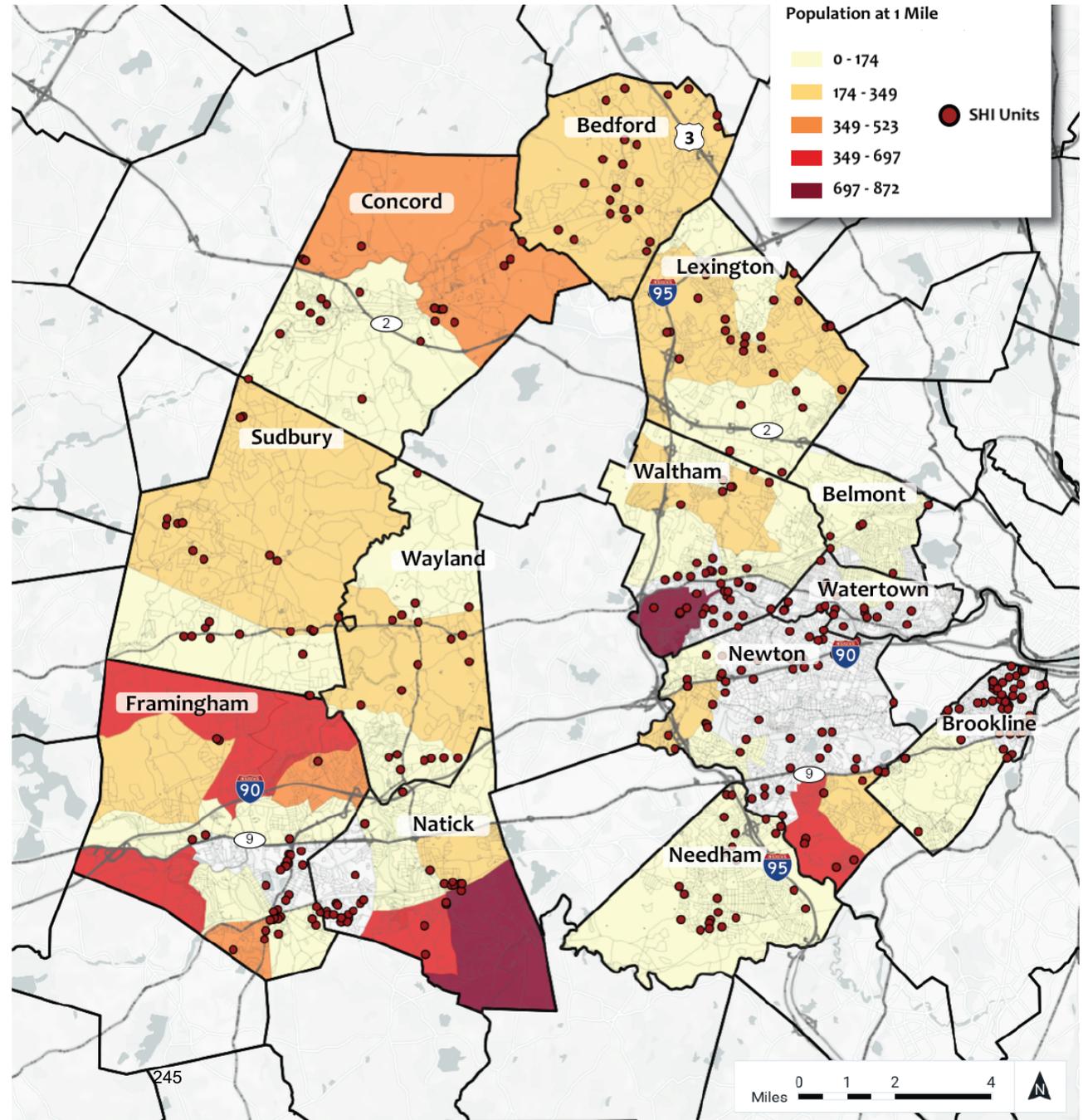


Source: Urban Footprint Walk and Transit Accessibility Analysis, 2020

How long does it take (minutes) to walk to the nearest amenities, e.g. schools, parks, and hospitals, and in this case, public transportation? "High quality" transit includes types of fixed-route transit with frequent services, such as rail, subway, metro, and light rail, given the existing walk network.

food access

This information comes from the Economic Research Service, U.S. Dept of Agriculture. The map indicates low income populations with low access to food at one mile from their residence. "Food" here means distance to supermarkets.



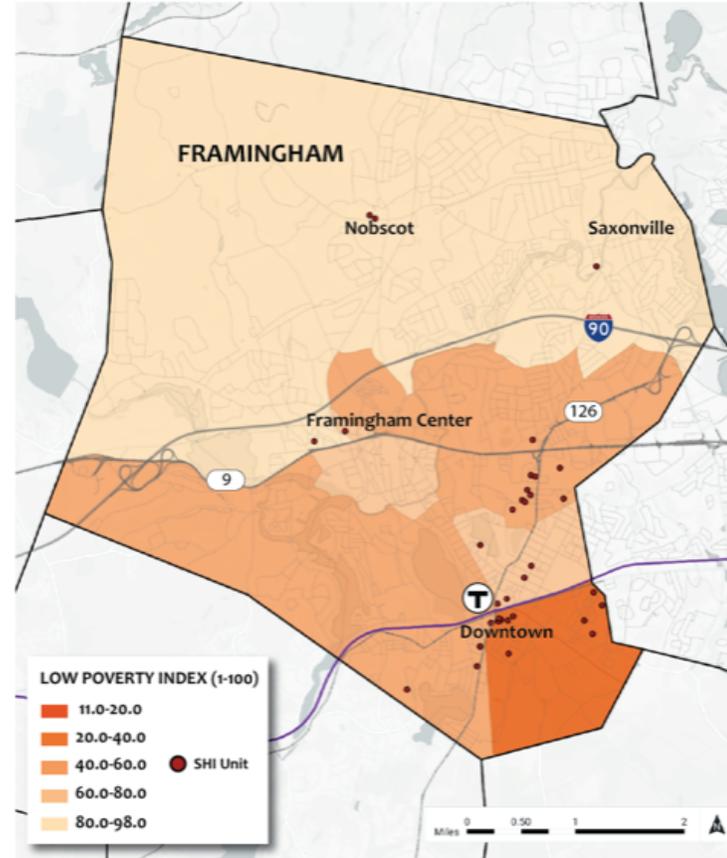


close-ups

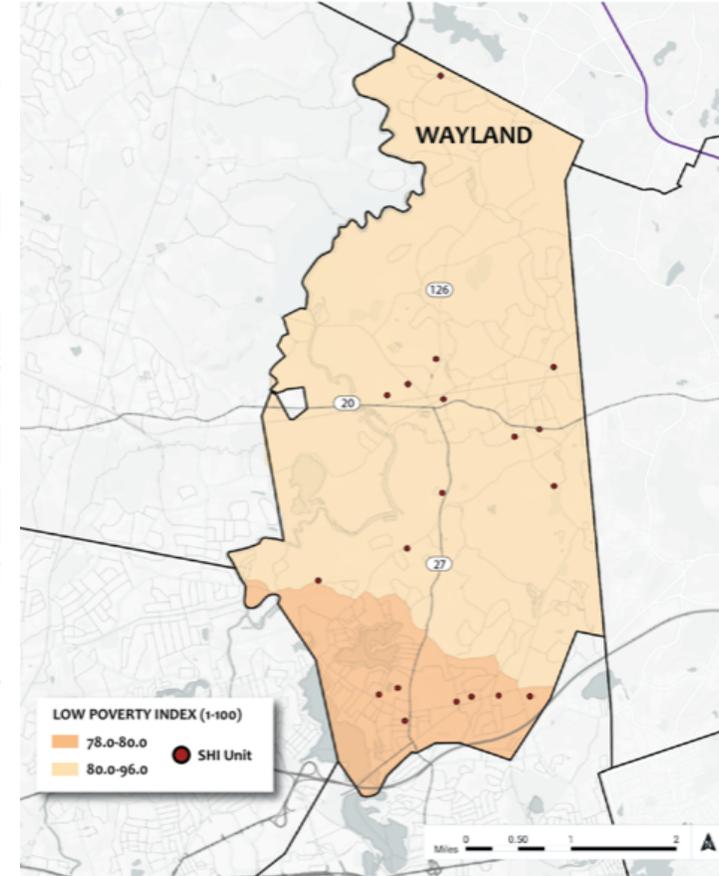
framingham | wayland

low poverty index

The Low Poverty Index captures the depth and intensity of poverty in a neighborhood. Values are percentile ranked nationally. The resulting values range from 0 to 100. Higher score (lighter color) = less exposure to poverty.



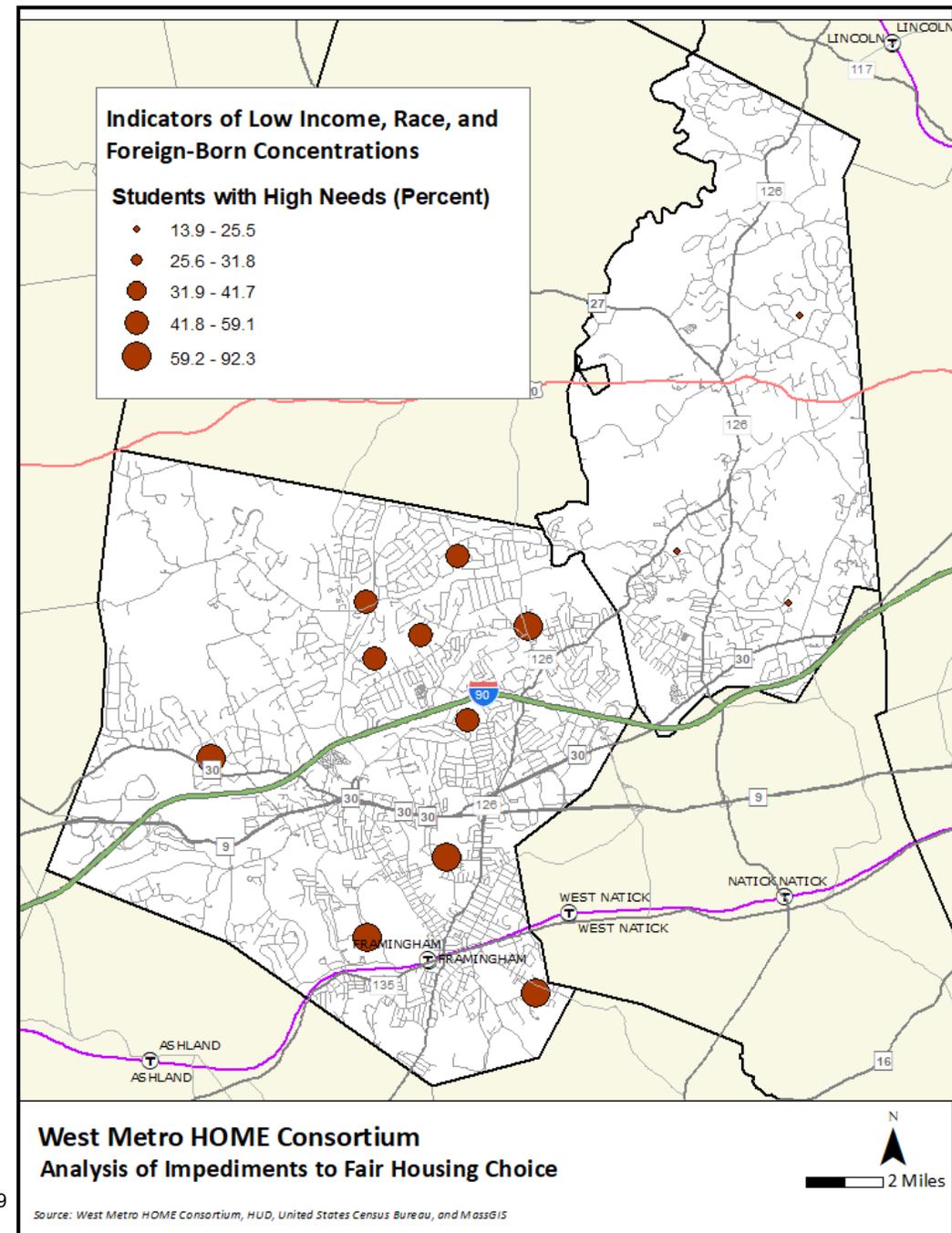
Source: U.S. Department of Housing and Urban Development, Low Poverty Index, 2017



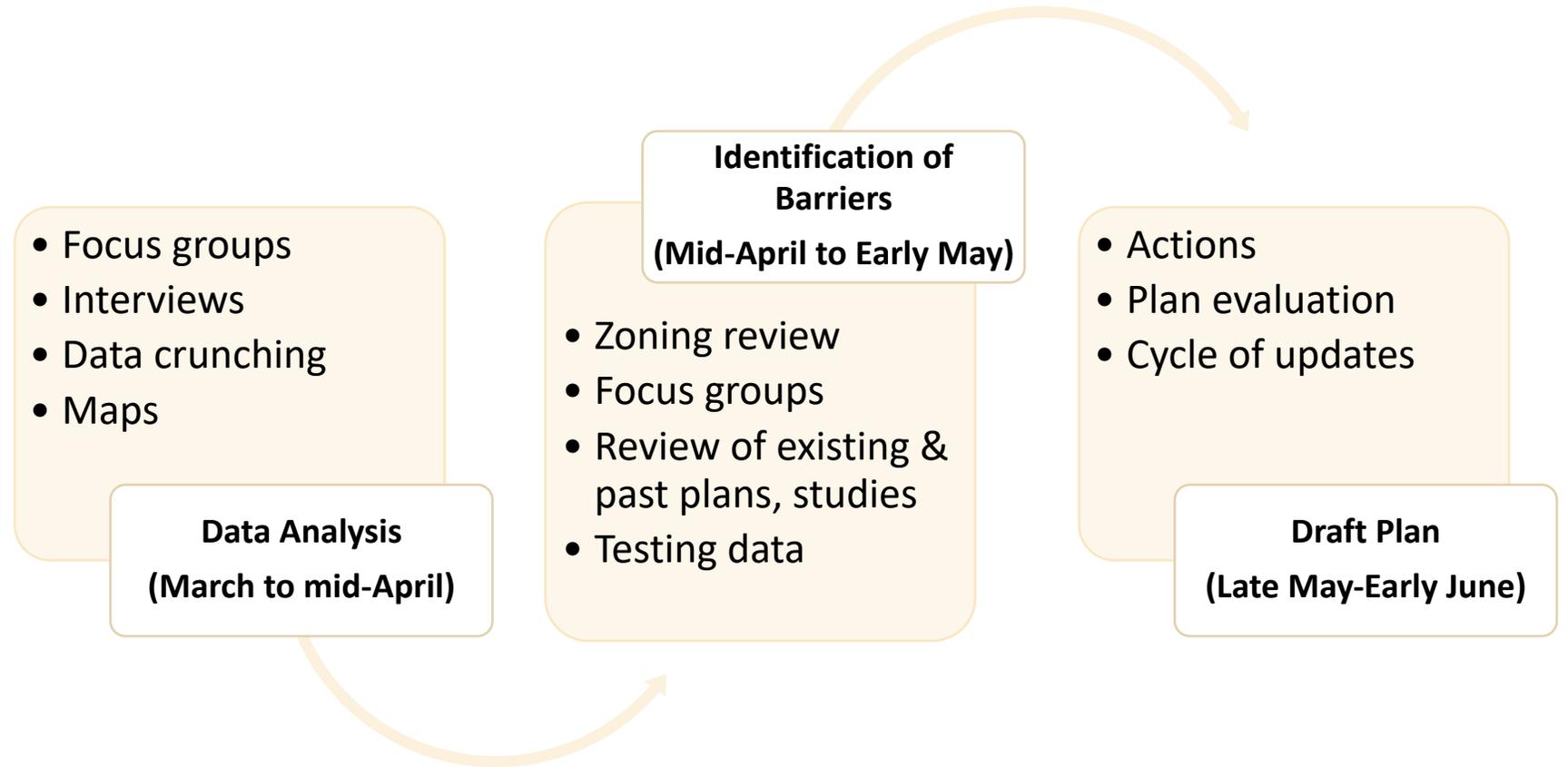
Source: U.S. Department of Housing and Urban Development, Low Poverty Index, 2017

meeting the needs of low-income families

Public elementary schools by percentage of students with high needs: high poverty, SNAP, free/reduced lunch program participation, Limited English Proficiency



Schedule (Estimated)



APPENDIX: CITIZEN PARTICIPATION PLANS

CITIZEN PARTICIPATION PLAN
CITY OF NEWTON HOUSING AND COMMUNITY DEVELOPMENT PROGRAM
REVISED MARCH 2019. Approved at Annual Action Plan Public Hearing.

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

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

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

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

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

1. Process for Citizen Participation

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

Individual Citizens

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

Newton Housing Partnership

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

Fair Housing Committee

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

Commission on Disability

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

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

Organizations, Agencies and the Newton Housing Authority

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

Planning and Development Board

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

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

City Council

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

2. Public Meetings and Public Hearings

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

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

The two public hearings are:

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

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

The public hearings for the Consolidated Plan will cover:

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

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

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

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

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

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

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

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

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

3. Notice of Meetings

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

Public Meetings

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

Public Hearings of the Planning and Development Board

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

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

- Amendments to the Proposed Use of Funds

Notices for public hearings for amendments to the use of funds proposed in the Consolidated Plan and/or Annual Action Plan will be e-mailed or mailed to Board members. Notice will also be posted on the Electronic Posting Board, the Public Notice Board and broadcast on the television monitor on the first floor of City Hall. Notice will also be provided on the City's website in the City Calendar and

listed in the Planning and Development Department’s weekly “Friday Report” which is e-mailed or mailed to City officials, agency/organization representatives and residents.

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

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

5. Access to Information

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

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

6. Comments

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

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

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

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

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

7. Timely Response

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

8. Technical Assistance

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

9. Use of the Citizen Participation Plan

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

10. Jurisdiction Responsibility

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

CITIZEN PARTICIPATION PLAN

WESTMETRO HOME CONSORTIUM CITIZEN PARTICIPATION PLAN

REVISED MARCH 2018

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

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

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

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

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

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

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

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

1. Process for Citizen Participation

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

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

2. Public Hearings

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

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

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

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

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

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

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

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

3. Notice of Meetings

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

Newspaper

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

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

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

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

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

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

5. Access to Information

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

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

6. Comments

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

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

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

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

Housing and Community Development Program Planning and
Development Department
1000 Commonwealth Avenue
Newton, MA 02459
E-mail: rpowers@newtonma.gov/ Fax: 617-796-1142

7. Timely Response

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

8. Technical Assistance

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

9. Use of the Citizen Participation Plan

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

10. Jurisdiction Responsibility

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

WESTMETRO HOME CONSORTIUM ANTI-DISPLACEMENT AND RELOCATION PLAN

Permanent Relocation

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

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

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

Temporary Relocation

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

APPENDIX: PUBLIC COMMENTS + RESPONSES



Regional Housing Services Office

Serving Acton, Bedford, Concord, Lexington, Lincoln, Sudbury, Wayland, and Weston

Office Address: 37 Knox Trail, Acton, MA 01720
Phone: (978) 287-1092

Website: WWW.RHSOhousing.org
Email: INFO@RHSOhousing.org

January 29, 2020

John Stella
PO Box 543
Bedford, MA 01730

Dear John,

I am writing in response to your letter to the City of Newton regarding the FY21-FY25 Consolidated Plan for the WestMetro HOME Consortium of which Bedford is a member.

The FY21-FY25 HOME Consolidated Plan provides a planning framework for the HOME funds allocated to Bedford. In the past, Bedford has been allocated approximately \$20,000 per year through the HOME Program, which is likely to stay somewhat constant. This level of funding is more aptly suited to renovation and smaller projects, which is why Bedford plans to utilize the HOME funds for improvements at the Bedford Housing Authority units, and their Tenant-Based Rental Assistance Program – both of which serve low income households.

Your letter references the need for low income veteran's housing. As you may know, Bedford is a leader in the state in providing low income housing for veterans with 130 units dedicated to providing permanent, supportive housing for homeless Veterans and those at imminent risk of homelessness.

And lastly, the Town of Bedford and its residents were able to substantially influence the design of the residential development at the former Coast Guard property. Through community workshops, public meetings and numerous town meeting articles, the Coast Guard property was developed for homeownership condominiums, of which 4 are permanently restricted to low income households.

Thank you for taking the time to participating in the planning process for the FY21-FY25 HOME Consolidated Plan.

Please feel free to contact me further if you have additional comments,

Sincerely,

Elizabeth Rust
Agent for Bedford

CC: Amanda Berman, Director of Housing and Community Development
Alyssa Sandoval, Bedford Economic Development Director

Tiffany Leung

From: Amanda Berman
Sent: Thursday, February 06, 2020 3:31 PM
To: Barney Heath; Girard Plante
Cc: Tiffany Leung; Jini Fairley; robpcaruso@yahoo.com
Subject: RE: Planning Board Public Hearing on Monday, February 3, 2020

Thank you so much Girard for attending Monday night's public hearing, and for the follow-up email.

On April 6th, we will be back in front of the Planning & Development Board for another public hearing. This presentation will include our FY21 Annual Action Plan, which will outline the human service and emergency solutions grant allocations for the upcoming program year.

Please let us know if you have any additional questions.

Best,

Amanda Berman
Director of Housing & Community Development
Department of Planning & Development
City of Newton
617-796-1147 (Direct)
617-796-1120 (Dept)
aberman@newtonma.gov
www.newtonma.gov/gov/planning

From: Barney Heath <bheath@newtonma.gov>
Sent: Tuesday, February 4, 2020 5:40 PM
To: Girard Plante <gap4peace@aol.com>
Cc: Amanda Berman <aberman@newtonma.gov>; Tiffany Leung <tleung@newtonma.gov>; Jini Fairley <jfairley@newtonma.gov>; robpcaruso@yahoo.com
Subject: RE: Planning Board Public Hearing on Monday, February 3, 2020

Thanks Girard for the kind words and coming to our meeting last night. We appreciate the feedback.

Barney S. Heath
Director of Planning and Development
City of Newton, MA
617-796-1120

From: Girard Plante <gap4peace@aol.com>
Sent: Tuesday, February 04, 2020 11:03 AM
To: Barney Heath <bheath@newtonma.gov>
Cc: Amanda Berman <aberman@newtonma.gov>; Tiffany Leung <tleung@newtonma.gov>; Jini Fairley <jfairley@newtonma.gov>; robpcaruso@yahoo.com
Subject: Planning Board Public Hearing on Monday, February 3, 2020

[DO NOT OPEN links/attachments unless you are sure the content is safe.]

Staffers of Planning and Development Department -

Kudos to each of you for working on the exhaustive, comprehensive Consolidated Plan!

The expansive document is startling in its various community problems that mirror many similar 'societal' situations across America.

While these particular problems plague the West Metro municipalities listed in the Plan, no matter peoples' socioeconomic background, I am troubled by the numerous ways that they must daily live.

Last night's discussion of the Plan focused primarily on income disparities and affordable accessible housing.

You never dove into the stark realities confronting individuals and families dealing with homelessness, domestic violence, drug addiction, suicide, food disparities and more.

My sense after reading the Plan is that most Newton residents lacking knowledge of the problems that require health and human services, intervention by various social service agencies and entities for an array of personal problems, will be stunned to learn such problems exist within the affluent communities.

In addition, I applaud the earnest efforts of the many people staffing the agencies/entities that are daily prepared to respond to unsettling albeit real-life matters such as domestic violence, safe

houses, sexual assault, stalking, and so on.

In spite of my near-four decades active involvement in my respective communities, myriad knowledge attained from my advocacy work, I was not aware the Consolidated Plan includes a vast network of agencies/entities that cover health and human services and social services counselors ready to respond to the unique needs certain individuals are confronting.

It is reassuring to know a vast network is in place to assist in the vexing problems too many people struggle with. I shall keep all that in mind as my advocacy brings me to all manner of dire situations.

Will you be holding a public hearing that focuses primarily on the above matters in the future? I believe it's vital information despite the delicate issues and alarming problems.

Peace,

Girard A. Plante, Journalist
Accessibility Specialist

2/17/2020

To Planning and Development Department & Board:

I would like to provide some comments on the Draft Consolidated Plan for 2021-25.

My major concern has to do with coordination of the funds received from ESG & CDBG. I believe that a more thoughtful drafting of the RFPs for both programs; closer monitoring of the subrecipients; and collaboration between the ESG & CDBG providers will provide better outcomes. I support coordination of the goals for both ESG and CDBG recipients. If the greatest needs are not being met by a subrecipient, then the program ought not to be funded.

Based on the identified needs, what are the best ways to maximize the impact of the ESG and CDBG funds?

1. If 58% of households, who are housing cost burdened, fall at or below 50% AMI, then a commensurate % of ESG and CDBG funds should be targeted to this group even if HUD allows services to moderate income folk;
2. Since the total number of low-to-moderate-income owner households, that are housing cost burdened, 62% are elderly, ESG and CDBG funds should target this population, not with fitness programs, but with case management to determine if the homeowner is eligible for public programs and resources to decrease their burden – programs like the city’s tax assistance program & reduced water/sewer bills; fuel assistance; accessory apartments; and housing rehabilitation;
3. If the “lack of affordable (<50% AMI) and accessible units in Newton is creating instability for persons with disabilities and seniors”, we should prioritize funding and/or develop ways to supplement the housing assistance to these populations – like the Tenant Based Rental Assistance, provided by Bedford, Framingham, Natick, Waltham and Wayland;
4. Since the City’s Inclusionary Zoning Ordinance (effective 1/1/2021) does not assure that **all** market-rate and mixed income projects will include units at or below 50% AMI, we may find that the above rental assistance program could meet this need.

The report states that Brookline Community Mental Health Center uses ESG funds to work with the Brookline Housing Authority. I would strongly suggest that BCMHC have an agreement with the Newton Housing Authority as well. It should be a goal that BCMHC use its expertise to assist Newton in forming a similar coalition to the one established in Brookline to provide a safety net program.

Middlesex Human Service Agency and Community Day Center of Waltham use ESG funds to support the homeless population. Due to their locations, in an adjacent community, I would like to see – as a goal – that both set up satellite office hours with a Newton-based organization such as TSS or Family Access.

When issuing the RFP, “the City of Newton will convene local providers from the former BNWW CoC, as well as representatives from the BoS CoC, to discuss the allocation of ESG funds among the program’s eligible components.” In theory this is a great idea, but it keeps the funds within a small group of providers and may miss the opportunity to have new subrecipients in the mix. Perhaps there should be a goal of increasing the pool of local providers when discussing the allocation of funds.

I think the idea of collaboration amongst subrecipients of **both** ESG and CDBG is crucial to getting the best outcomes from the funds administered. Brown-bag sessions are a good opportunity to form a network of human service **and** housing providers to better meet the goals of the Consolidated Plan. Going forward, both groups of subrecipients should come together, at a minimum, for quarterly meetings **and** the quarterly reports submitted to Planning and Development should more clearly collect information about collaboration to maximize the impact of the limited funds and prevent a small group of individuals and families.

Thank you including these comments with your plan.

Kathy Laufer

26 Mosman Street, W. Newton



Ruthanne Fuller
Mayor

City of Newton, Massachusetts
Department of Planning and Development
1000 Commonwealth Avenue Newton, Massachusetts 02459

Telephone
(617) 796-1120
Telefax
(617) 796-1142
TDD/TTY
(617) 796-1089
www.newtonma.gov

Barney Heath
Director

June 11, 2020

Kathy Laufer
26 Mosman Street
West Newton, MA 02465

RE: Draft FY21-25 Consolidated Plan for Newton and the WestMetro HOME Consortium

Dear Ms. Laufer:

The City of Newton is in receipt of your comments and thanks you for your feedback relative to the City of Newton's Draft FY21-25 Consolidated Plan. The Department of Planning and Development has carefully reviewed your recommendations and has addressed your concerns below.

- 1.) **Comment:** My major concern has to do with coordination of the funds received from ESG & CDBG. I believe that a more thoughtful drafting of the RFPs for both programs; closer monitoring of the subrecipients; and collaboration between the ESG & CDBG providers will provide better outcomes. I support coordination of the goals for both ESG and CDBG recipients. If the greatest needs are not being met by a subrecipient, then the program ought not to be funded.

Department Response: Staff has been working closely with the Commissioner of Health & Human Services and her staff to refine the RFP's for both the Human Services and ESG programs, to better align the requests for proposals with the City's identified needs. For the FY21 Human Service RFP, an important change was made to remove the program's sole emphasis on economic mobility in exchange for services and/or interventions that focus on supporting and enhancing the lives of vulnerable low- and moderate-income and presumed eligible residents across the lifespan. The three key priority areas identified in the RFP were: 1.) Enrichment and Care for Vulnerable Youth, 2.) Stability and Self-Sufficiency for Vulnerable Adults, and 3.) Promoting Economic Security and Vitality for Older Adults.

Additionally, the review process was streamlined and included a two-step process, where staff from both the Planning & Development Department and Health & Human Services Department came together to review and rank each proposal, with a priority given to proposals that demonstrated a strong return on investment in terms of community impact, as well as the development of significant program outcomes, among other metrics. The review committee also focused on the proposals' connection to the three priority areas, and sub-priorities, identified in the Request for Proposals.

Additionally, in FY19, staff kicked off the Consolidated Planning process with two brown bag lunches for the Human Service and ESG subrecipients to initiate stronger coordination and knowledge sharing amongst these organizations, as well as the City. These sessions were highly productive for the participants and staff plans to implement these sessions on a more regular basis.

While staff monitors all subrecipients on a quarter basis, through the detailed review of quarterly reports, regular communication with each subrecipient provides staff with critical information on the program's successes and challenges throughout the year. This regular communication strengthens relationships and allows staff to anticipate issues that may arise with a subrecipient. Annually, staff conducts a risk assessment to determine which subrecipients are to be formally monitored according to HUD's guidelines, which includes an on-site visit to the agency's site.

- 2.) **Comment:** Based on the identified needs, what are the best ways to maximize the impact of the ESG and CDBG funds? If 58% of households, who are housing cost burdened, fall at or below 50% AMI, then a commensurate % of ESG and CDBG funds should be targeted to this group even if HUD allows services to moderate income folk.

Department Response: Approximately 48% of households who are housing cost burdened (>30% of income spent on housing costs) in Newton have incomes at or below 50% AMI and approximately 16% of households in Newton who are housing cost burdened have annual incomes between 50% and 80% AMI (moderate-income).

ESG funds are only available to individuals and households that are currently homeless or at-risk of homelessness and have an annual income at or below 30% AMI.

While the Newton Housing Partnership and Planning & Development Board have discussed the concept of targeting CDBG funds to residents and households at or below 50% AMI, no concrete policy has been put in place at this time. This will surely be a conversation that the City continues to have with each affordable housing project that seeks CDBG and HOME funds; however, I do not foresee staff recommending that Human Service funds be targeted in such a strict way, as the need for these services is very present amongst moderate-income residents, as well as those who are extremely low- and low-income in Newton.

- 3.) **Comment:** Since the total number of low-to-moderate-income owner households, that are housing cost burdened, 62% are elderly, ESG and CDBG funds should target this population, not with fitness programs, but with case management to determine if the homeowner is eligible for public programs and resources to decrease their burden – programs like the city's tax assistance program & reduced water/sewer bills; fuel assistance; accessory apartments; and housing rehabilitation.

Department Response: In FY21, the City of Newton will support Riverside Community Care's mental health services, which promote the health, wellbeing and self-sufficiency of children, adults, and elders. Through CDBG's Human Services program, Riverside Community Care will provide outpatient mental health and case management services to vulnerable low-income youth, adults and elders in Newton. While CDBG funded the City's Senior Services fitness program in FY20, this program will not receive CDBG funding in FY21.

- 4.) **Comment:** If the “lack of affordable (<50% AMI) and accessible units in Newton is creating instability for persons with disabilities and seniors”, we should prioritize funding and/or develop ways to supplement the housing assistance to these populations – like the Tenant Based Rental Assistance, provided by Bedford, Framingham, Natick, Waltham and Wayland;

Department Response: Staff and the Newton Housing Partnership have continued to discuss ways in which to support the creation, rehabilitation and preservation of affordable units at or below 50% AMI. We seek to support new development of affordable units at this level with CDBG and HOME funds; and the City’s new Inclusionary Zoning ordinance, updated in summer 2019, requires private developers to provide a percentage of a project’s units at 50% AMI. The need for units at this level, and for these specific populations, is ever present and continued efforts must be undertaken to create the critical units, through increased funding, changes in zoning, creative public-private partnerships, and more effective advocacy for a diversity of housing throughout Newton. Tenant Based Rental Assistance (TBRA), however, continues to be a challenge in a market like Newton, where the subsidy needed to support one household is so large. The City’s previous TBRA program served three households, and only one of those households was able to find permanent housing in Newton. Staff will continue to assess this program, but at this time, we feel strongly that our HOME dollars are put to better use through the creation of new units.

- 5.) **Comment:** Since the City’s Inclusionary Zoning Ordinance (effective 1/1/2021) does not assure that **all** market-rate and mixed income projects will include units at or below 50% AMI, we may find that the above rental assistance program could meet this need.

Department Response: Effective August 1, 2019, the City’s updated Inclusionary Zoning ordinance requires the following: For rental Inclusionary Housing Projects with 10 or more residential dwelling units, where two or more rental Inclusionary Units are required at Tier 1 (50%-80% AMI), the AMI used for establishing rent and income limits for these Inclusionary Units must average no more than 65% of AMI. Alternatively, at least 50% of such units may be priced for households having incomes at 50% of AMI and the remaining Inclusionary Units may be priced for households at 80% of AMI. With Inclusionary Housing projects, we tend to see most developers choosing to provide half of the Tier 1 units at 50% AMI and half at 80% AMI, with the occasional 65% AMI unit.

- 6.) **Comment:** The report states that Brookline Community Mental Health Center uses ESG funds to work with the Brookline Housing Authority. I would strongly suggest that BCMHC have an agreement with the Newton Housing Authority as well. It should be a goal that BCMHC use its expertise to assist Newton in forming a similar coalition to the one established in Brookline to provide a safety net program.

Department Response: Staff will explore this concept with Brookline Community Mental Health Center; however, it should be noted that Newton Housing Authority residents due rely on BCMHC’s ESG funds.

- 7.) **Comment:** Middlesex Human Service Agency and Community Day Center of Waltham use ESG funds to support the homeless population. Due to their locations, in an adjacent community, I would like to see – as a goal – that both set up satellite office hours with a Newton-based organization such as TSS or Family Access.

Department Response: Staff will explore this concept with these organizations; however, it should be noted that these subrecipients have strong working relationships and often refer clients to each other on a regular basis.

- 8.) **Comment:** When issuing the RFP, “the City of Newton will convene local providers from the former BNWW CoC, as well as representatives from the BoS CoC, to discuss the allocation of ESG funds among the program’s eligible components.” In theory this is a great idea, but it keeps the funds within a small group of providers and may miss the opportunity to have new subrecipients in the mix. Perhaps there should be a goal of increasing the pool of local providers when discussing the allocation of funds.

Department Response: Staff will consider this recommendation.

- 9.) **Comment:** I think the idea of collaboration amongst subrecipients of **both** ESG and CDBG is crucial to getting the best outcomes from the funds administered. Brown-bag sessions are a good opportunity to form a network of human service **and** housing providers to better meet the goals of the Consolidated Plan. Going forward, both groups of subrecipients should come together, at a minimum, for quarterly meetings **and** the quarterly reports submitted to Planning and Development should more clearly collect information about collaboration to maximize the impact of the limited funds and prevent a small group of individuals and families.

Department Response: In FY19, staff kicked off the Consolidated Planning process with two brown bag lunches for the Human Service and ESG subrecipients to initiate stronger coordination and knowledge sharing amongst these organizations, as well as the City. These sessions were highly productive for the participants and staff plans to implement these sessions on a more regular basis. We will consider bringing the ESG and Human Service subrecipients together, rather than hold separate sessions for the two programs.

The final version of the Consolidated Plan will be submitted to HUD by June 30, 2020. Your comments and the Planning Department’s response will be included within the appendices of that final document.

Thank you again for your comments and your participation in the planning process for the FY21-25 Consolidated Plan. If you have any questions, please don’t hesitate to reach me at aberman@newtonma.gov or (617) 796-1147.

Sincerely,



Amanda Berman
Director of Housing and Community Development

Cc: Mayor Ruthanne Fuller
Barney Heath, Director of Planning & Development
Planning & Development Board

Tiffany Leung

From: Amanda Berman
Sent: Monday, March 2, 2020 5:26 PM
To: Tiffany Leung; Kevin McCormick
Subject: RE: CDBG funds

Hi Kevin,
I'm so sorry for the delay! Please see my notes in red below.

The Consolidated Plan is a document that represents the City of Newton, as well as the other twelve WestMetro HOME Consortium communities. While entitlement communities like Waltham are required to submit to HUD their own Consolidated Plan as it relates specifically to the use of their CDBG funds, our ConPlan is the place where these communities are required to discuss the use of their HOME funds. Many of the communities provide detail in this plan on other housing projects and programs (not necessarily funded by HOME) that complement the projects and programs funded through HOME. Some of the communities tend to provide more detail than others.

Please let us know if you have any other questions.

Best,

Amanda Berman
Director of Housing & Community Development
Department of Planning & Development
City of Newton
617-796-1147 (Direct)
617-796-1120 (Dept)
aberman@newtonma.gov
www.newtonma.gov/gov/planning

From: Tiffany Leung <tleung@newtonma.gov>
Sent: Monday, February 24, 2020 9:09 AM
To: Kevin McCormick <mc.sail@verizon.net>
Cc: Amanda Berman <aberman@newtonma.gov>
Subject: RE: CDBG funds

Hi Kevin,

Thank you for taking a very close look at the draft Consolidated Plan. Appreciate your feedback. Amanda and I will look over these pages and make the appropriate changes.

Tiffany Leung
Community Development Planner
Department of Planning & Development
City of Newton
617-796-1146 (Direct)
617-796-1120 (Dept)
www.newtonma.gov/gov/planning

From: Kevin McCormick <mc.sail@verizon.net>
Sent: Friday, February 21, 2020 2:49 PM
To: Tiffany Leung <tleung@newtonma.gov>
Subject: RE: CDBG funds

[DO NOT OPEN links/attachments unless you are sure the content is safe.]

Tiffany,

Thanks for getting back to me. Here are the places I found CDBG for other communities

Page 96, bottom paragraph, "City of Waltham CDBG Lead Loan Program"

As Tiffany mentioned, Waltham is an entitlement community and receives its own CDBG funds, which it uses to fund this program. The City of Newton is not responsible for the administration / management of Waltham's CDBG funds.

Page 98, middle of first paragraph, "CDBG funded lead paint program" that I think is Waltham

Same comment as above.

Page 124, last line, "CDBG funding" that is Waltham

Same comment as above. Waltham is an entitlement community and receives its own CDBG funds each year, which it uses to fund these program.

Page 146, second last paragraph, "CDBG funding"

Same comment as above.

Page 148, last paragraph, "CDBG"

Same comment as above, however, some of the services that are discussed in this paragraph are funded through HOME.

Page 165, second paragraph, whole paragraph discusses CDBG funded program for Waltham

Same comment as above.

Kevin

From: Tiffany Leung [<mailto:tleung@newtonma.gov>]
Sent: Friday, February 21, 2020 10:33 AM
To: Kevin McCormick
Cc: Amanda Berman; Gabriel Holbrow
Subject: RE: CDBG funds

Hi Kevin,

I hope this email finds you well. Amanda is away this week, but Gabriel mentioned that you had a question about the draft Consolidated Plan.

You are correct. Newton's CDBG funds must be spent in Newton, and projects must specifically benefit low- and moderate-income people in Newton. HOME funds are received on behalf of the 13-member WestMetro HOME Consortium. Lastly, because of our relationship with Brookline, Waltham, and Watertown from the former Continuum

of Care, ESG funds be used to serve homeless individuals and families or those at-risk of homelessness living in the four communities.

Waltham, Brookline, and Framingham, while they are part of the WestMetro HOME Consortium, they are also entitlement communities like Newton. So as a standalone community, they also receive their own CDBG funds from HUD. They do not use Newton's CDBG funds.

That might not have been clear in the Consolidated Plan. Do you mind pointing out the specific section(s) or page(s) that calls out the use of CDBG funds by Waltham and Brookline? We will be sure to clarify in the final draft.

Many thanks,
Tiffany Leung
Community Development Planner
Department of Planning & Development
City of Newton
617-796-1146 (Direct)
617-796-1120 (Dept)
www.newtonma.gov/gov/planning

From: Gabriel Holbrow <gholbrow@newtonma.gov>
Sent: Friday, February 21, 2020 10:21 AM
To: Tiffany Leung <tleung@newtonma.gov>
Cc: Amanda Berman <aberman@newtonma.gov>
Subject: FW: CDBG funds

Dear Tiffany,

Thanks for talking with me just now about Mr. McCormick's question on the Consolidated Plan. Here is his email with his question(s).

Gabriel Holbrow

From: Kevin McCormick <mc.sail@verizon.net>
Sent: Friday, February 21, 2020 9:36 AM
To: Gabriel Holbrow <gholbrow@newtonma.gov>
Subject: RE: CDBG funds

[DO NOT OPEN links/attachments unless you are sure the content is safe.]

Gabriel,

Thanks

Sometime next week is fine

Kevin

From: Gabriel Holbrow [<mailto:gholbrow@newtonma.gov>]
Sent: Friday, February 21, 2020 8:55 AM
To: Kevin McCormick
Cc: Amanda Berman
Subject: RE: CDBG funds

Dear Mr. McCormick,

Amanda is indeed out this week. We expect her back on Monday, February 21.

I am not familiar enough with the Consolidated Plan to directly answer your question. (Honestly, my way of answering your question, if the answer had to come from me, would be... to first ask Amanda.) However, I believe that Amanda will be able to explain when she returns.

Gabriel Holbrow

Community Planner – Engagement Specialist
Department of Planning & Development
City of Newton

gholbrow@newtonma.gov
(617) 796-1140
Room B10, 1000 Commonwealth Avenue
Newton, Massachusetts 02459-1449

From: Kevin McCormick <mc.sail@verizon.net>
Sent: Thursday, February 20, 2020 5:10 PM
To: Gabriel Holbrow <gholbrow@newtonma.gov>
Subject: FW: CDBG funds

Gabriel

Amanda has not gotten back to me concerning my email below. Perhaps she is out this week or very busy. And maybe I should go through you for these type of messages. Does that make sense in the future?

The reason that I am asking about Newton's CDBG is that the Draft Consolidated Plan mentions CDBG funding that is being used in other communities such as Waltham and Brookline and I want to know if those CDBG funds are from Newton or through the other communities. If the funds do not come from Newton I don't think they should be in Newton's Con Plan.

Thanks

Kevin McCormick

From: Kevin McCormick [<mailto:mc.sail@verizon.net>]
Sent: Monday, February 17, 2020 9:58 PM
To: Amanda Berman (aberman@newtonma.gov)
Subject: CDBG funds

Amanda,

I have question about Newton's CDBG Funds. I know that the HOME funds are spent by all members of the Consortium and the ESG funds can go to different organizations in the Continuum of Care. But I thought the CDBG funds that Newton receives would only be spent within Newton. Is that true?

Kevin McCormick

When responding, please be aware that the Massachusetts Secretary of State has determined that most email is public record and therefore cannot be kept confidential.

When responding, please be aware that the Massachusetts Secretary of State has determined that most email is public record and therefore cannot be kept confidential.

UNITING CITIZENS FOR HOUSING AFFORDABILITY (U-CHAN)
53B TAFT AVENUE
WEST NEWTON, MA 02465
617-543-8097

January 21, 2020

Amanda Berman, Director of Housing and Community Development
Department of Planning and Development
Newton City Hall
1000 Commonwealth Avenue
Newton, MA 02459

Dear Ms. Berman.

I am writing to submit information which U-CHAN believes should be considered as the Housing Department composes its DRAFT of the 2021-2025 Consolidated Plan.

Many of us for many years have been disappointed and frustrated at the lack of participation in the public meetings by the direct beneficiaries of the human service programs and housing projects funded by the federal funds. We do not believe it is because they are disinterested rather it has been due to meetings being held at a time not convenient for them to attend i.e. middle of the day when they are working or evening when they would need to have childcare.

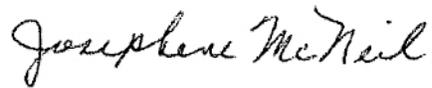
This year we decided that we would seek an alternative way to seek their input – a survey. To that end we contracted with a Brandeis student under the supervision of Tatjana Meschede, Ph.D. Associate Director, Institute on Assets and Social Policy (IASP), Senior Scientist/Senior Lecturer at the Heller School for Social Policy and Management at Brandeis University to prepare an online survey which would be used by (1) nonprofits that service this population and (2) managers of housing subsidized by public funds. Those nonprofits and property managers distributed the surveys. While the number of respondents was limited – 28 -; it is substantial compared to the number of attendees at the Planning Department public presentations. So we think the data are meaningful.

We included questions in the survey about (1) family income; (2) housing and neighborhood, including experience of homelessness ; (3) transportation; (4) employment need/desires.; (5) perceived social supports and (6) connection with the community. With the assistance of our Brandeis collaborators, we compiled what we consider the most important

results in a summary report that is attached. I hope that you will consider them as you prepare the draft.

Please feel free to contact me if you have need of any further information. We have more results than those highlighted in the report and would be happy to share them with you.

Sincerely,

A handwritten signature in cursive script that reads "Josephine McNeil".

Josephine McNeil
Co-Chair U-CHAN

Cc: Ruthanne Fuller, Mayor
Barney Heath, Director of Planning and Development Department
Peter Doeringer, Planning and Development Board Chair
Susan Albright, President of City Council

U-CHAN (UNITING CITIZENS FOR AFFORDABLE HOUSING IN NEWTON)
53B TAFT AVENUE
WEST NEWTON, MA 02465
PHONE: 617-543-8097
EMAIL: jomac1941@aol.com

April 13, 2020

Deborah Crossley, Chair
Zoning and Planning Committee (ZAP)
Newton City Hall
1000 Commonwealth Avenue
Newton, MA 02459

RE: FY 21-25 Consolidated Plan and FY 21 Annual Action Plan

Dear Ms. Crossley,

It is my understanding that ZAP will be asked to ratify the FY 21-25 Consolidated Plan and the FY'21 Annual Action Plan (the "Plans"). By and large this will be a perfunctory exercise given the need to submit the Plans to HUD by May 15th. Despite that U-CHAN would like to highlight several shortcomings in the Plans. We are of the opinion that even though the expenditure of these funds are within the total prerogative of the Mayor, you the city council should be concerned about the housing and human services needed by the citizens of Newton, especially the most needy.

1. FY 21-25 Consolidated Plan
 - a. Citizen Participation Plan –

- i. In recognition of past failures to include the voices of low-income residents of affordable housing, we commissioned a survey of low-income residents in Several subsidized housing projects, public housing Units and units created by inclusionary housing in Newton. Results of that survey are included in the survey results and letter to the Planning Department transmitting those results. – *the results of those survey are not included in the plan.*
- ii. Public notices are to be sent to TAB; it is not clear that TAB will be published long term – *alternate notice method should be included.*
- iii. Access to drafts only online – *at least five copies should be placed in Newton library with at least 3 available for limited circulation.*

b. Needs Assessment

i. Human Services

The attached survey mentioned above, identified two areas of need most identified by the low-income residents were housing supports and services related to increasing their economic status such as help with preparing cover letters, Resumes and interviewing skills i.e. pathways to economic mobility – *this need was not included in Newton’s Strategic Plan section of the plan.*

ii. Housing

The assessment identifies those individuals and families who are most housing cost burdened are those with incomes below 50% of the AMI – *Newton does not prioritize its use of federal funds for this population.*

FY'21 Annual Action Plan

1. Citizens Participation Plan

a. The Newton Housing Partnership (NHP) is mentioned as playing a central role in review of CDBG, HOME funds and activities – *with respect to housing proposal, the NHP's advice should be sought earlier in the vetting process.*

b. Written communications to Planning Department will receive written response within 15 days – *that process in not being followed.*

2. The City Council is the final citizen policy board to review and take action – *the timing of the submission is too late for meaningful input; they should receive interim reports so they are in a position to make knowledgeable decisions in a short period of time.*

3. Human Services

The plan shows the ESG funds are awarded to many sub recipients but not broken down by community – *quarterly reports from sub recipients should include data by community including race and ethnicity and amount Awarded or what purpose.*

4. HOME Funding for Housing

No plans shown for use of funds in Newton – *HOME funds should be used for tenant based rental assistance program with economic mobility funding.*

In closing, U-CHAN believes that the City Council has among its numerous responsibilities; the care of its citizens, especially the most vulnerable, even if that care is being paid for by federal funds as opposed to Newton taxes.

Therefore, we recommend that the City Council request the Planning Department make a detailed and comprehensive report to ZAP

(housing) and the Programs and Services committee (human services) over the next several months to address the shortcomings above and others. It is possible for the Plans to be changed by a process called “Substantial Change”; if it is determined that changes should be made to better serve the needs of Newton’s low and moderate income citizens.

Thank you for your attention to these matters. They are especially important now in light of the devastation that is being inflicted upon the low income population by COVID 19.

In the recently passed CARES ACT congress appropriated additional CDBG and ESG funds specifically to assist persons whose housing is impacted as a consequence of the virus. The City of Newton will receive additional funds at the same rate it currently receives for those funds.

Please feel free to contact me with any questions.

Sincerely,

Josephine McNeil
Co-chairperson of U-CHAN

Cc: Mayor Ruthanne Fuller
Barney Heath, Director of Planning and Development
Amanda Berman, Manager of the Housing Department
Peter Doeringer, Chair of the Planning and Development Board



Ruthanne Fuller
Mayor

City of Newton, Massachusetts
Department of Planning and Development
1000 Commonwealth Avenue Newton, Massachusetts 02459

Telephone
(617) 796-1120
Telefax
(617) 796-1142
TDD/TTY
(617) 796-1089
www.newtonma.gov

Barney Heath
Director

June 11, 2020

Josephine McNeil
U-CHAN (UNITING CITIZENS FOR AFFORDABLE HOUSING IN NEWTON)
53B Taft Avenue
West Newton, MA 02465

RE: Draft FY21-25 Consolidated Plan for Newton and the WestMetro HOME Consortium

Dear Ms. McNeil:

The City of Newton is in receipt of your comments and thanks you for your feedback relative to the City of Newton's Draft FY21-25 Consolidated Plan. The Department of Planning and Development has carefully reviewed your recommendations and has addressed your concerns below.

- 1.) **Comment:** FY 21-25 Consolidated Plan - Citizen Participation Plan: In recognition of past failures to include the voices of low-income residents of affordable housing, we commissioned a survey of low-income residents in several subsidized housing projects, public housing Units and units created by inclusionary housing in Newton. Results of that survey are included in the survey results and letter to the Planning Department transmitting those results. – *the results of those survey are not included in the plan.*

Department Response: Staff received, reviewed, and considered the survey results and the results of this survey are included in this final version of the FY21-25 Consolidated Plan.

- 2.) **Comment:** FY 21-25 Consolidated Plan - Citizen Participation Plan: Public notices are to be sent to TAB; it is not clear that TAB will be published long term – *alternate notice method should be included.*

Department Response: Staff will provide for alternative notice methods if and when the TAB is no longer published. In the meantime, as listed in the Citizen Participation Plan, we take the following measures to advertise and post notices of public hearings:

- Meeting notices for the Consolidated Plan, Annual Action Plan, and CAPER will be e-mailed or mailed to Planning & Development Board members and posted on the Electronic Posting Board, the City webpage relevant to the subject matter (i.e. <http://www.newtonma.gov/fairhousing>), and the Public Notice Board, and broadcast on the television monitor, both located on the first floor of City Hall.

- Notice will also be provided on the City’s website in the City Calendar and listed in the Planning and Development Department’s weekly “Friday Report” which is e-mailed or mailed to City officials, agency/organization representatives and residents.
- While this is not included in the CPP, staff also emails notices of public hearings related to these plans to the Newton Housing Partnership, Fair Housing Committee, and all current and past ESG and Human Services subrecipients.

3.) **Comment:** FY 21-25 Consolidated Plan - Citizen Participation Plan: Access to drafts only online – *at least five copies should be placed in Newton library with at least 3 available for limited circulation.*

Department Response: Staff published the final draft of the FY21-25 Consolidated Plan in the midst of the coronavirus pandemic, in which all Planning Department staff were working remotely, and the Newton Library was closed to the public.

4.) **Comment:** Needs Assessment – Human Services: The attached survey mentioned above, identified two areas of need most identified by the low-income residents were housing supports and services related to increasing their economic status such as help with preparing cover letters, Resumes and interviewing skills i.e. pathways to economic mobility – *this need was not included in Newton’s Strategic Plan section of the plan.*

Department Response: As detailed in the Needs Assessment section of the Plan, of the public service needs identified through the Consolidated Planning process, many coincided with housing such as landlord education and supportive services to maintain successful tenancy. Supportive services include assistance with basic needs and life skills, financial literacy, and mental health services. Other public service needs identified include financial assistance for security deposits and first and last month’s rent, access to affordable childcare, legal services, home care for the elderly, and job training. Another public service need that often came up throughout the needs assessment sessions was the need for better transportation options for low- to moderate-income individuals and families to allow access to services and programs, as well as the need for translation and interpretation services for non-English speaking individuals and families.

In FY21, the Human Service program will emphasize services and/or interventions that focus on supporting and enhancing the lives of vulnerable low- and moderate-income and presumed eligible residents across the lifespan. The three key priority areas identified in the FY21 Human Service Request for Proposals (RFP) were: 1.) Enrichment and Care for Vulnerable Youth, 2.) Stability and Self-Sufficiency for Vulnerable Adults, and 3.) Promoting Economic Security and Vitality for Older Adults.

As detailed in the FY21 Human Service RFP, proposals falling under Priority Area Two “should provide services and/or interventions to vulnerable adults ages 19-61 years, designed to provide critical support, training, and services that encourage stable and independent lives with recognition that a comprehensive approach might include education, job training, family supports, supportive housing, financial literacy, physical and mental health, and special population support. Programs should focus on and describe how they will create one or more of the following outcomes:

- Promote career preparation and family support with an emphasis on jobs that pay self-sustaining and/or family-sustaining wages.
- Promote increased stability for populations who are at the highest risk of “falling through the cracks” including interventions for becoming more independent once stabilized.

- Provide physical and/or mental health services that meet a need otherwise unlikely to be met.

5.) **Comment:** Needs Assessment – Housing: The assessment identifies those individuals and families who are most housing cost burdened are those with incomes below 50% of the AMI – *Newton does not prioritize its use of federal funds for this population.*

Department Response: ESG funds are only available to individuals and households that are currently homeless or at-risk of homelessness and have an annual income at or below 30% AMI.

While the Newton Housing Partnership and Planning & Development Board have discussed the concept of targeting CDBG funds to residents and households at or below 50% AMI, no concrete policy has been put in place at this time. Staff and the Newton Housing Partnership have continued to discuss ways in which to support the creation, rehabilitation and preservation of affordable units at or below 50% AMI. We seek to support new development of affordable units at this level with CDBG and HOME funds; and the City’s new Inclusionary Zoning ordinance, updated in summer 2019, requires private developers to provide a percentage of a project’s units at 50% AMI. The need for units at this level, and for these specific populations, is ever present and continued efforts must be undertaken to create the critical units, through increased funding, changes in zoning, creative public-private partnerships, and more effective advocacy for a diversity of housing throughout Newton.

6.) **Comment:** FY21 Annual Action Plan – Citizen Participation Plan: The Newton Housing Partnership (NHP) is mentioned as playing a central role in review of CDBG, HOME funds and activities – *with respect to housing proposal, the NHP’s advice should be sought earlier in the vetting process.*

Department Response: Staff will continue to work with the Newton Housing Partnership to review affordable housing projects that seek federal and local funds. Staff will continue to encourage developers to present proposed projects to the NHP early on in the development review process so the Partnership has the ability to positively impact the outcome of a project.

7.) **Comment:** FY21 Annual Action Plan – Citizen Participation Plan: Written communications to Planning Department will receive written response within 15 days – *that process is not being followed.*

Department Response: As stated in the Citizen Participation Plan, “Citizens and other interested parties may present oral comments at the time of the hearing and/or submit written comments for 30 days after the public hearing for the proposed Consolidated Plan, Annual Action Plan, Analysis of Impediments to Fair Housing Choice and any substantial or material changes and for 15 days after public hearings for the proposed Citizen Participation Plan and the CAPER... The City of Newton will respond in writing within 15 calendar days to any written comments, questions or complaints received regarding the Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan, CAPER or the Newton Housing and Community Development Program in general... The City of Newton will consider all comments in preparing its final Citizen Participation Plan, Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan and CAPER for submission to HUD, and will include a summary of all comments received and the actions taken to address each comment.”

Staff acknowledged the receipt of all comments during the 30 day public comment period and provided in this final version of the Consolidated Plan to be submitted to HUD is a summary of all the comments received, as well as the actions taken to address each comment, of which this letter is a part.

8.) **Comment:** FY21 Annual Action Plan: The City Council is the final citizen policy board to review and take action – *the timing of the submission is too late for meaningful input; they should receive interim reports so they are in a position to make knowledgeable decisions in a short period of time.*

Department Response: Staff will consider this proposal; however, Councilors are in communication with staff throughout the year to inquire about the specifics of our federal programs and subrecipients.

9.) **Comment:** FY21 Annual Action Plan – Human Services: The plan shows the ESG funds are awarded to many sub recipients but not broken down by community – *quarterly reports from sub recipients should include data by community including race and ethnicity and amount.*

Department Response: Staff will consider this proposed change to our ESG quarterly reports.

10.) **Comment:** FY21 Annual Action Plan – HOME Funding for Housing: No plans shown for use of funds in Newton – *HOME funds should be used for tenant based rental assistance program with economic mobility funding.*

Department Response: At this time, staff is in communication with 2Life Communities regarding its Golda Meir House Expansion Project. 2Life will seek Newton HOME dollars to support the creation of additional affordable senior units.

Tenant Based Rental Assistance (TBRA), however, continues to be a challenge in a market like Newton, where the subsidy needed to support one household is so large. The City’s previous TBRA program served three households, and only one of those households was able to find permanent housing in Newton. Staff will continue to assess this program, but at this time, we feel strongly that our HOME dollars are put to better use through the creation of new units.

11.) **Comment:** We recommend that the City Council request the Planning Department make a detailed and comprehensive report to ZAP (housing) and the Programs and Services committee (human services) over the next several months to address the shortcomings above and others. It is possible for the Plans to be changes by a process called “Substantial Change”; if it is determined that changes should be made to better serve the needs of Newton’s low and moderate income citizens.

Department Response: Staff will consider this proposal, in communication with City Council leadership; however, the Planning & Development Board, acting as Newton’s Community Development Board, is the governing citizen body for the City’s CDBG, HOME and ESG Programs and staff regularly reports to the P&D Board throughout the year.

The final version of the Consolidated Plan will be submitted to HUD by June 30, 2020. Your comments and the Planning Department’s response will be included within the appendices of that final document.

Thank you again for your comments and your participation in the planning process for the FY21-25 Consolidated Plan. If you have any questions, please don't hesitate to reach me at aberman@newtonma.gov or (617) 796-1147.

Sincerely,

A handwritten signature in black ink, appearing to read 'Amanda Berman', is positioned above the typed name.

Amanda Berman
Director of Housing and Community Development

Cc: Mayor Ruthanne Fuller
Barney Heath, Director of Planning & Development
Planning & Development Board

APPENDIX: CITY COUNCIL BOARD ORDER

CITY OF NEWTON

IN CITY COUNCIL

April 21, 2020

ORDERED:

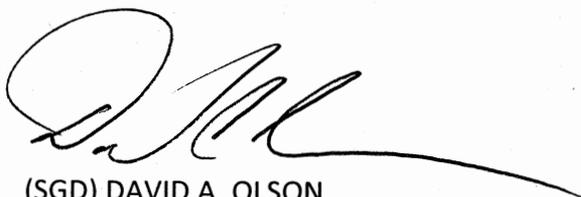
That, in accordance with the recommendation of the Zoning & Planning Committee through its Chair Deborah J. Crossley, the following is hereby approved by the Honorable City Council:

#213-20 Authorization to submit FY21-FY25 Consolidation Plan and FY21 Annual Action Plan
HER HONOR THE MAYOR requesting City Council Authorization, pursuant to the 2019 Revised Citizen Participation Plan, to submit the FY21-FY25 Consolidation Plan and FY21 Annual Action Plan to the US Department of Housing and Urban Development (HUD) for the City of Newton Community Development Block Grant (CDBG) and Emergency Solution Grant (ESG) funds and the WestMetro HOME Consortium.

Under Suspension of Rules

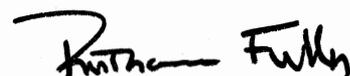
Readings Waived and Item Approved

22 yeas 0 nays 1 absent (Councilor Baker) 1 recused (Councilor Ryan)



(SGD) DAVID A. OLSON

City Clerk



(SGD) RUTHANNE FULLER

Mayor

Date: 4/24/20

APPENDIX: CERTIFICATIONS

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text"/>	4. Applicant Identifier: <input type="text" value="B-20-MC-25-0019"/>	
5a. Federal Entity Identifier: <input type="text" value="UPG Code: MA251650"/>	5b. Federal Award Identifier: <input type="text" value="B-20-MC-25-0019"/>	
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text" value="City of Newton"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="46-001404"/>	* c. Organizational DUNS: <input type="text" value="0765768260000"/>	
d. Address:		
* Street1: <input type="text" value="1000 Commonwealth Avenue"/>		
Street2: <input type="text"/>		
* City: <input type="text" value="Newton"/>		
County/Parish: <input type="text"/>		
* State: <input type="text" value="MA: Massachusetts"/>		
Province: <input type="text"/>		
* Country: <input type="text" value="USA: UNITED STATES"/>		
* Zip / Postal Code: <input type="text" value="02459-1149"/>		
e. Organizational Unit:		
Department Name: <input type="text" value="Planning and Development"/>	Division Name: <input type="text" value="Housing/Community Development"/>	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text" value="Mrs."/>	* First Name: <input type="text" value="Amanda"/>	
Middle Name: <input type="text"/>		
* Last Name: <input type="text" value="Berman"/>		
Suffix: <input type="text"/>		
Title: <input type="text" value="Director of Housing and Community Development"/>		
Organizational Affiliation: <input type="text" value="City of Newton"/>		
* Telephone Number: <input type="text" value="617-796-1147"/>	Fax Number: <input type="text"/>	
* Email: <input type="text" value="aberman@newtonma.gov"/>		

Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

X: Other (specify)

Type of Applicant 3: Select Applicant Type:

*** Other (specify):**

WestMetro HOME Cons; BoS CoC

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

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.218

CFDA Title:

CDBG/Entitlement Grant Program

*** 12. Funding Opportunity Number:**

B-20-MC-25-0019

*** Title:**

City of Newton CDBG Program

13. Competition Identification Number:

Title:

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

Form SF 424 Attachment - Question 14.pdf

Add Attachment

Delete Attachment

View Attachment

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

City of Newton CDBG Program

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:
* a. Applicant * b. Program/Project

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

17. Proposed Project:
* a. Start Date: * b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="1,931,323.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value="100,000.00"/>
* g. TOTAL	<input type="text" value="2,031,323.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**
 a. This application was made available to the State under the Executive Order 12372 Process for review on
 b. Program is subject to E.O. 12372 but has not been selected by the State for review.
 c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**
 Yes No
If "Yes", provide explanation and attach

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

Authorized Representative:
Prefix: * First Name:
Middle Name:
* Last Name:
Suffix:
* Title:
* Telephone Number: Fax Number:
* Email:

* Signature of Authorized Representative:  * Date Signed:

Form SF 424
City of Newton

14. Areas Affected by Project – Attachment

CDBG Program: City of Newton

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

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

Form SF 424
City of Newton

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

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text"/>	4. Applicant Identifier: E20-MC-25-0010	
5a. Federal Entity Identifier: UPG Code: MA251650	5b. Federal Award Identifier: E20-MC-25-0010	
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text" value="City of Newton"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 46-001404	* c. Organizational DUNS: 0765768260000	
d. Address:		
* Street1: 1000 Commonwealth Avenue	Street2: <input type="text"/>	
* City: Newton	County/Parish: <input type="text"/>	
* State: MA: Massachusetts	Province: <input type="text"/>	
* Country: USA: UNITED STATES	* Zip / Postal Code: 02459-1149	
e. Organizational Unit:		
Department Name: Planning and Development	Division Name: Housing/Community Development	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: Mrs.	* First Name: Amanda	Middle Name: <input type="text"/>
* Last Name: Berman	Suffix: <input type="text"/>	
Title: <input type="text" value="Director of Housing and Community Development"/>		
Organizational Affiliation: <input type="text"/>		
* Telephone Number: 617-796-1147	Fax Number: <input type="text"/>	
* Email: <input type="text" value="aberman@newton.gov"/>		

Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

X: Other (specify)

Type of Applicant 3: Select Applicant Type:

* Other (specify):

WestMetro HOME Cons; BoS CoC

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

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.231

CFDA Title:

City of Newton ESG Program

*** 12. Funding Opportunity Number:**

E20-MC-25-0010

* Title:

City of Newton ESG Program

13. Competition Identification Number:

Title:

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

Form SF 424 Attachment - Question 14.pdf

Add Attachment

Delete Attachment

View Attachment

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

City of Newton ESG Program

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

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

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="167,734.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value=""/>
* g. TOTAL	<input type="text" value="167,734.00"/>

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

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

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

Yes No

If "Yes", provide explanation and attach

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

** I AGREE

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

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:



* Date Signed:

Form SF 424
City of Newton

14. Areas Affected by Project – Attachment

CDBG Program: City of Newton

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

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

Form SF 424
City of Newton

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

Application for Federal Assistance SF-424	
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	
* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	
* If Revision, select appropriate letter(s): _____ * Other (Specify): _____	
* 3. Date Received: _____	4. Applicant Identifier: M20-DC25-0213
5a. Federal Entity Identifier: UPG Code: MA251650 Newton	5b. Federal Award Identifier: M20-DC25-0213
State Use Only:	
6. Date Received by State: _____	7. State Application Identifier: _____
8. APPLICANT INFORMATION:	
* a. Legal Name: City of Newton	
* b. Employer/Taxpayer Identification Number (EIN/TIN): 46-001404	* c. Organizational DUNS: 0765768260000
d. Address:	
* Street1: 1000 Commonwealth Avenue	_____
Street2:	_____
* City: Newton	_____
County/Parish:	_____
* State: MA: Massachusetts	_____
Province:	_____
* Country: USA: UNITED STATES	_____
* Zip / Postal Code: 02459-1149	_____
e. Organizational Unit:	
Department Name: Planning and Development	Division Name: Housing/Community Development
f. Name and contact information of person to be contacted on matters involving this application:	
Prefix: Mrs.	* First Name: Amanda
Middle Name:	_____
* Last Name: Berman	_____
Suffix:	_____
Title: Director of Housing and Community Development	
Organizational Affiliation: _____	
* Telephone Number: 617-796-1147	Fax Number: _____
* Email: aberman@newton.gov	

Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

X: Other (specify)

Type of Applicant 3: Select Applicant Type:

*** Other (specify):**

WestMetro HOME Cons; BoS CoC

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

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Investment Partnerships Program

*** 12. Funding Opportunity Number:**

MA20-DC25-0213

*** Title:**

WestMetro HOME Consortium

13. Competition Identification Number:

Title:

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

Form SF 424 Attachment - Question 14.pdf

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

WestMetro HOME Consortium Program

Attach supporting documents as specified in agency instructions.

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

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

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="1,480,032.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value="350,000.00"/>
* g. TOTAL	<input type="text" value="1,830,032.00"/>

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

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

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

- Yes
- No

If "Yes", provide explanation and attach

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

** I AGREE

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

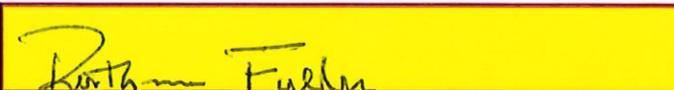
Authorized Representative:

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

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative: 

* Date Signed:

Form SF 424
City of Newton

14. Areas Affected by Project – Attachment

CDBG Program: City of Newton

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

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

Form SF 424
City of Newton

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

ASSURANCES - NON-CONSTRUCTION PROGRAMS

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

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

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

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

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

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

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor
APPLICANT ORGANIZATION City of Newton; Community Development Block Grant Program	DATE SUBMITTED 5/12/20

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

ASSURANCES - NON-CONSTRUCTION PROGRAMS

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

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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor
APPLICANT ORGANIZATION City of Newton; ESG program	DATE SUBMITTED 5/12/20

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

ASSURANCES - NON-CONSTRUCTION PROGRAMS

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14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor
APPLICANT ORGANIZATION City of Newton; HOME Investment Partnerships Program	DATE SUBMITTED 5/12/20

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

ASSURANCES - CONSTRUCTION PROGRAMS

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

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1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor
APPLICANT ORGANIZATION City of Newton, Community Development Block Grant program	DATE SUBMITTED 5/12/20

ASSURANCES - CONSTRUCTION PROGRAMS

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

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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor
APPLICANT ORGANIZATION City of Newton, ESG program	DATE SUBMITTED 5/12/20

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

ASSURANCES - CONSTRUCTION PROGRAMS

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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor
APPLICANT ORGANIZATION City of Newton, HOME Investment Partnerships program	DATE SUBMITTED 5/12/20

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

CERTIFICATIONS

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

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

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

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

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

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

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

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

Ruthann Fuller
Signature of Authorized Official

5/12/20
Date

Mayor
Title

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

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

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

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

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

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

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) FY21-25 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws -- It will comply with applicable laws.

Ruthann Fuller
Signature of Authorized Official

5/12/20
Date

Mayor
Title

OPTIONAL Community Development Block Grant Certification

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

Ruthann Fuller
Signature of Authorized Official

5/12/20
Date

Mayor
Title

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Subsidy layering -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

Ruthann Fuller
Signature of Authorized Official

5/12/20
Date

Mayor
Title

Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

Major rehabilitation/conversion/renovation – If an emergency shelter’s rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for these individuals.

Matching Funds – The recipient will obtain matching amounts required under 24 CFR 576.201.

Confidentiality – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

Discharge Policy – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

Ruthanne Follen
Signature of Authorized Official

5/12/20
Date

Mayor
Title

Housing Opportunities for Persons With AIDS Certifications

The HOPWA grantee certifies that:

Activities -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building -- Any building or structure assisted under that program shall be operated for the purpose specified in the consolidated plan:

1. For a period of not less than 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For a period of not less than 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

Signature of Authorized Official

Date

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.