

CITY OF NASHUA, NH



Annual Action Plan for Community Development Block Grant and HOME Investment Partnership Program

For the period July 1, 2019 – June 30, 2020

Jim Donchess, Mayor

City of Nashua

City Hall, 229 Main Street

Nashua, NH 03060

Adopted 05/28/2019

Executive Summary

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

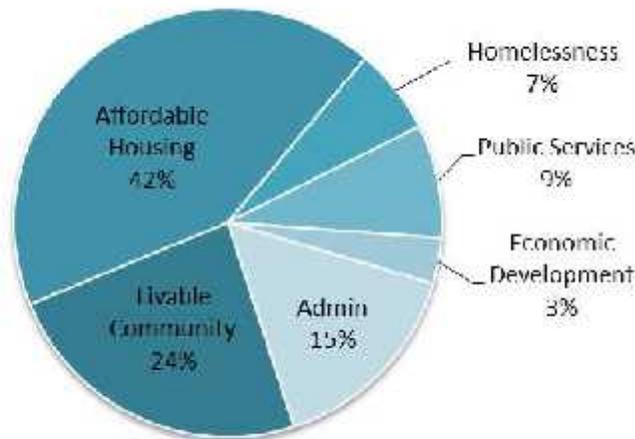
1. Introduction

This Annual Action Plan (AAP) serves as the application for funding to the U.S. Department of Housing and Community Development (HUD) for the Community Development Block Grant (CDBG) and HOME Investment Partnership Program. The AAP details the activities and funding planned during FY2020, covering July 1, 2019 – June 30, 2020. A draft of the AAP was made available for a 30-day public comment period beginning March 20, 2019 at the Urban Programs Department; advertised in the Nashua Telegraph; posted to the City’s website and through email, as requested.

This Action Plan uses the new HUD low/moderate income area data that went into effect April 1, 2019, which is based on 2011-2015 American Community Survey data. It is noted throughout the plan if alternate data was used to supplement the pre-populated information.

Fiscal year 2020 reflects the fifth and final year of the City of Nashua’s Five-Year Consolidated Plan. The Consolidated Plan identifies Nashua’s affordable housing, community development and economic development needs and outlines a comprehensive and coordinated strategy to address the needs. The City of Nashua is not an entitlement grantee under the McKinney Act, Emergency Shelter Grant (ESG) or Housing Opportunities for Persons with AIDS (HOPWA) programs. However funds from these programs may be sought on a competitive basis through the Greater Nashua Continuum of Care, consistent with this Consolidated Plan.

The goals of the Consolidated Plan parallel those that HUD has established for jurisdictions across the country to pursue as part of their consolidated planning efforts: to provide decent housing and a suitable living environment, and expand economic opportunities, principally for low- and moderate-income persons.



Objectives and Outcomes

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

Affordable housing: Housing continues to be one the City's highest priority. The City's HOME dollars directly support creation/preservation of affordable housing. The City will fund its long-standing housing rehab program for low-income, owner-occupied properties. However, new this year the City will implement a pilot program to cover rental rehab. Described in detail later in this Plan, rental rehab was a high need identified in the Consolidated Planning process. Code enforcement is also an important tool to maintain decent safe housing and address blight from vacant and poorly maintained properties.

Livable Community: The City will use CDBG funding toward improvements of facilities that serve the public and infrastructure projects, including improved lighting, sidewalks and parks. Facility improvements reflect a significant proportion of funding and include those owned by non-profit entities who serve Nashua's vulnerable populations.

Public Services: Expanding the availability of and increasing access to needed services is a key goal of the City. Services include, but are not limited to, mental health, job training, food banks and youth programs.

Homelessness: From a financial standpoint, the households most susceptible to becoming homeless are households who earn less than 30% median income and are severely cost-burdened (paying more than 50% of their income for rent). Other populations disproportionately at risk of becoming homeless are victims of domestic violence, substance abuse, those with severe mental health problems and people leaving prison.

In order to address this at-risk population, there is a need for long-term permanent affordable housing and supportive transitional/permanent housing for the at-risk sub-populations. Counseling, health-care, life-skills training and sustainable employment at an adequate wages are all critical to reducing homelessness within the City. CDBG funding will be used to support these efforts under the public service cap and HOME funds will be used to increase the supply of permanent affordable housing.

Economic development: Economic development was ranked high through citizen participation in the Consolidated Plan. A new initiative to foster the development of micro-enterprises will be assisted in this Plan year, with the goal of reaching approximately 40-50 low-moderate income entrepreneurs.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

As of submittal of this Action Plan, the City has nearly completed year four of the five-year Consolidated Plan. The Consolidated Annual Performance Evaluation Report (CAPER) is prepared shortly after the end of the fiscal year and contains the final/accurate numbers of accomplishments. Following is a summary showing progress to date. Keeping in mind, goals may be evenly spread over the five-year Plan, or may

be planned to occur at the beginning/end of the plan. For each major category, we have indicated whether we are on target, ahead or behind according to the original Consolidated Plan.

Affordable Housing - This objective is largely on or ahead of target. The number of units under “Ensure Safe & Sanitary Housing, which reflects units addressed under the HUD Lead-Paint Grant, is over our 5-year goals by more than 150%. Homeowner Rehab (units completed under the Housing Improvement Program) and Rental Housing Development (new construction/substantial rehab of low income rental housing, primarily through the HOME program) are on target to reach the 5-year goals.

The one area under this category failing to meet the 5-year goals is Homeownership. Our plans to fund a down payment assistance program were met with challenges related to FHA lending guidelines, and the program was never launched. Some progress was made through a partnership with Habitat for Humanity, we have assisted in the development of four new owner units.

Public Services – This objective is generally ahead or on target in reaching planned goals. Youth & Special Needs Population focused activities continue to be the community’s priority, followed by General Public Services. The one area lagging behind is Transportation. Although identified in the community planning process as a high need/priority, it has not been funded in the annual allocation process. However many strides in meeting the needs of low-moderate income individuals has been made by the City independent of Plan funding. One recent example includes a newly expanded service to Walmart in Amherst, NH. The service offers riders more opportunities to get to Walmart and Amherst shopping plazas by providing additional service hours including new Saturday service and night service on Tuesdays and Fridays. The new service, which began on March 5, 2019, builds off the success of the Route 10 pilot program that NTS launched back in 2017, which answered an overwhelming request by NTS customers for round-trip service to Walmart.

Homelessness – Limited resources under the ConPlan are available to address this need directly and the City relies on the work of the Greater Nashua Continuum of Care and the HUD grants they obtain to address this need in earnest. This objective is on target with planned resources through public services, outreach and overnight shelter beds. That is not to say that the community need is being met, rather that the numeric goals outlined in the ConPlan are on track. There continues to be disparate resources to adequately resolve homelessness in the community.

Economic Development – This objective has generally lagged behind at the expense of the success for other areas. Given the limited resources available, economic development has not been a funded priority in the action planning process. However, through an amendment to the PY18 (FY19) Plan, a combination of the Revolving Loan Fund balance and other priority year funds were reprogrammed to launch a micro-enterprise development initiative. Additionally, as described later in the Plan, CDBG resources are being allocated this Plan year to achieve assist an estimated total of 80-100 low-moderate income entrepreneurs. These efforts will help bring this goal into alignment.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The City follows its adopted Citizen Participation Plan for the development of each Annual Action Plan, which differs from development of the Consolidated Plan. Full details on the citizen participation and consultation process for the Consolidated Plan may be found in that document. Following is a summary of the efforts related to the Annual Plan.

The City issued a Request for Proposals (RFP) to identify activities on December 4, 2018, due January 10, 2019. Availability of the RFP was advertised in the Nashua Telegraph. The UPD also sent a courtesy e-mail to past or present recipients, those who had inquired throughout the year and to as many non-profit entities in the City as possible.

The City hosted a technical assistance/informational workshop on December 12, 2018. A public hearing, seeking input on priorities for the upcoming fiscal year was held on February 11, 2019 (all public hearings are advertised in the Nashua Telegraph 10-14 days prior). The RFP's and City's CDBG activity requests are evaluated through the Human Affairs Committee (HAC). The Action Plan was discussed at four Human Affairs Committee (HAC) meetings, noticed through the City's meeting agenda protocol. A second public hearing, to obtain input on the proposed Action Plan activities was held April 8, 2019. All meetings were posted and open to the public, consistent with the state's public meeting laws and are televised live on local access as well as web stream. The DRAFT Action Plan was made available for a 30-day comment period on March 20, 2019. However comment was accepted at public meetings up until adoption by the Board of Aldermen on May 28, 2019.

Related to the public service process, the Citizens Advisory Commission for Community Grants (CAC) accepted, evaluated and made funding recommendations. The City pools both general fund and CDBG dollars toward public services activities. The CAC is comprised of seven Nashua residents, three appointed by the Mayor, three by the Board of Aldermen and one Aldermanic liaison. The meetings are publically posted, subject to the same NH laws as all appointed bodies. The application period ran concurrently to CDBG and is administered through Urban Programs Department. The CAC met seven times from January 17 – February 21, 2019 to evaluate proposals.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

At the February 11, 2019 Public Hearing/HAC meeting, Carrie Schena, Urban Programs Manager, provided a summary of the CDBG and HOME programs, especially related to the anticipated funding amounts, allocation timeline and how that affects development of the Action Plan. Eight people offered testimony during the Public Hearing in favor of continued CDBG funding and explained their general proposals.

A Nashua Resident, Fred Teeboom, commented at several of the Human Affairs Committee and the final Board of Aldermen meeting. His comments were directed toward proposed changes to the Owner-Occupied Housing Improvement Program. Mr. Teeboom is in support of amending the existing policy to include grants below the current \$5,000 threshold. However, disagrees with the proposed range of \$1,000-\$5,000, stating that the threshold should be lower than \$1,000. The proposed changes also include directing these grants to owners at or below 30% AMI (other income levels would be offered loans), to which he commented the income level should be 50% AMI. The dollar and income targeting were discussed at several meetings with the Board ultimately deciding to keep the \$1,000 minimum and target the grants to households at or below 30% AMI (others assisted at this level will receive a loan). The decisions were based on staying out of the realm of maintenance (lower dollar values) and seeing what the demand is over the next year before deciding if the grant threshold should increase to 50% AMI.

All comments from public meetings may be found on the City's website. Posted under the Human Affairs Committee meetings of 2/11/19, 3/11/19, 4/8/19, 5/13/19 and the Board of Aldermen meeting 5/28/19.

Written comments submitted are attached to this plan.

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

All comments and views were accepted and considered. However, the Board of Aldermen did not necessarily change program design based on comments received, as discussed above in #5.

7. Summary

N/A

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

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

Describe the agency/entity 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	NASHUA	Community Development, Urban Programs
HOME Administrator	NASHUA	Community Development, Urban Programs

Table 1 – Responsible Agencies

Narrative (optional)

The City of Nashua’s Urban Programs Department within the Community Development Division is the administrator for the CDBG and HOME Programs.

Funds under the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009, such as Emergency Solutions Grant (ESG) or Housing Opportunities for Persons with AIDS (HOPWA) programs, are sought on a competitive basis and managed by the Greater Nashua Continuum of Care, consistent with this Consolidated Plan.

Consolidated Plan Public Contact Information

Carrie Schena
 Urban Programs Manager
 Community Development Division
 T: 603-589-3087
 F: 603-589-3398

AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

The activities listed below highlight the efforts to obtain public input and consultations to develop this plan. The City relies on information from HUD, the public, non-profits, the private sector and itself to compile the data needed to prioritize needs and goals. Since significant public input is needed to develop the Consolidated Plan, we rely heavily on it to develop each annual action plan. The public is invited to help direct resources on a year-to-year basis through public hearings and meetings. Overall we follow the 5-year Plan as a guide.

Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

The City of Nashua regularly coordinates with public and assisted housing providers along with private and governmental health, mental health, and service agencies. Community Development Division staff regularly attends meetings and other events involving the community and various stake holders. The CD Division works closely with other City Divisions, such as the Division of Public Health & Community Services, that also work closely with outside agencies to address needs. Engaging with nonprofit service providers on a regular basis will continue to foster an environment where the City works in tandem with the community towards better development.

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

The Greater Nashua Continuum of Care (GNCOOC) is the primary decision making group that manages the overall planning effort for homelessness. The communities served by GNCOOC include Nashua, Brookline, Amherst, Hollis, Merrimack, Milford, Mont Vernon, Hudson, Litchfield and Mason. The GNCOOC utilizes federal, state and private funds to address the needs of homeless, including competitive grants. Participating partner agencies include transitional housing providers, permanent housing providers, veteran’s services organizations, and shelter programs.

The City is represented at the GNCOOC by Manager of the Welfare Department, a department within the City of Nashua’s Division of Public Health & Community Services (DPHCS). The Welfare Officer is a member of the GNCOOC Executive Board and also chairs the GNCOOC Ending Homelessness sub-committee. The Ending Homelessness sub-committee was very active in the creation and implementation of the Coordinated Entry process for the Greater Nashua community, working with partner agencies to provide clients access to necessary homeless prevention and shelter services, including chronically homeless individuals and families and veteran populations.

The DPHCS also provides outreach to homeless and at-risk members of the community through health activities on the Outreach Van. HOPWA funds granted to the GNCOOC are also managed by this department.

The GNCOOC actively seeks funding to continue these services and the City supports homelessness prevention, in part, through periodic funding under the CDBG/HOME programs. This Action Plan includes support to the Nashua Soup Kitchen and Shelter (rehab to increase # of beds for homeless women); and public service support to Marguerite’s Place (transitional housing). Other examples of City

efforts to address the needs of homeless include the Mayor's Opioid Taskforce (addressing opioid addiction has a direct relationship to preventing homelessness); the Division of Public Health & Community Services' Welfare Department, Community Health Improvement Plan (CHIP), the Police Department and other departments who work collaboratively to address systemic problems that lead to homelessness.

The GNCOC's Ending Homelessness Subcommittee reports that the Coordinated Entry program has been running successfully for approximately two years. They are looking to improve by reviewing other states, developing a phone menu that will automatically direct the caller depending on their need/family type. They are also exploring how deal with the shortage of affordable housing in the area when clients are ready to move into permanent housing, noting that the existing wrap-around service protocol is critical in addressing this stage of transition. Addressing homelessness is more fully described in AP-65.

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

The City is not a direct recipient of ESG funds. The GNCOC applies for ESG funds through the SuperNOFA competitive process and identifies the community's needs for these funds directly.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

2	Agency/Group/Organization	Southern NH Services
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended focus group session to prioritize needs and develop goals/objectives of the Consolidated Plan.
3	Agency/Group/Organization	NASHUA SOUP KITCHEN AND SHELTER
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended focus group session to prioritize needs and develop goals/objectives of the Consolidated Plan. Participated in AP priority setting.
4	Agency/Group/Organization	Bridges
	Agency/Group/Organization Type	Services-Victims of Domestic Violence Victims of domestic & sexual assault
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended focus group session to prioritize needs and develop goals/objectives of the Consolidated Plan.
5	Agency/Group/Organization	HARBOR HOMES
	Agency/Group/Organization Type	Housing Services - Housing Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended focus group session to prioritize needs and develop goals/objectives of the Consolidated Plan.
6	Agency/Group/Organization	Greater Nashua Mental Health Center
	Agency/Group/Organization Type	Services-Health Health Agency
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended focus group session to prioritize needs and develop goals/objectives of the Consolidated Plan.

7	Agency/Group/Organization	Marguerite's Place
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children Homelessness Strategy Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended focus group session to prioritize needs and develop goals/objectives of the Consolidated Plan.
8	Agency/Group/Organization	Greater Nashua Habitat for Humanity
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended focus group session to prioritize needs and develop goals/objectives of the Consolidated Plan.
9	Agency/Group/Organization	Front Door Agency
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-homeless Services-Education Services-Employment

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children Homelessness Strategy Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended focus group session to prioritize needs and develop goals/objectives of the Consolidated Plan.
10	Agency/Group/Organization	Lamprey Health Care
	Agency/Group/Organization Type	Health Agency Including mental health care
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended focus group session to prioritize needs and develop goals/objectives of the Consolidated Plan.
11	Agency/Group/Organization	Nashua PAL (Police Athletic League)
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Families with children Homelessness Strategy Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Attended focus group session to prioritize needs and develop goals/objectives of the Consolidated Plan.

12	Agency/Group/Organization	Neighborworks Southern NH
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	NWSNH has qualified as a CHDO, created a Tree Street Plan, focuses on neighborhood revitalization, consults with the City on housing priorities and initiatives.

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

No agencies were intentionally excluded, the City attempts to include all not-for profit entities, as many financial, planning, inter-departmental and regional agencies as possible.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Greater Nashua Continuum of Care	The Continuum of Care provides the framework and services for many of the activities provided locally to provide assistance and housing to homeless individuals and families.
Nashua Regional Plan	Nashua Regional Planning Commission	Community & Economic Vitality, Environment, Housing and Transportation. The City especially relied on the Housing Needs Chapter of the Regional Plan.
Tree Street Neighborhood Plan	City of Nashua, Community Development	Enhancing suitable living environments for low-income residents and areas.
2017-2018 Biennial Housing Plan	NH Housing Finance Authority	Affordable housing
2015 Analysis of Impediments to Fair Housing	NH Housing Finance Authority	Affordable housing, fair housing, rental data
2000 Master Plan	City of Nashua	Housing, conservation, economic development, transportation, community facilities, public services

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
2015-2024 Ten Year Transportation Plan	State of NH	Economic development, transportation, opportunities for low-income residents
2017 Community Health Assessment	City of Nashua, Div of Public Health & Comm Services	Health & housing link, opportunities and suitable living environments for low-income residents
Housing Data (Purchase & Rental Trend Reports)	NHHFA	March 2019 report, analyzes current housing trends. Affordable Housing
Housing Needs in NH	NHHFA	Affordable housing
DRAFT AFH	City of Nasua	Fair Housing, Affordable Housing; preliminary data used to support goals/needs/priority

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

The City of Nashua's Community Development Division regularly coordinates with other Departments and Divisions throughout this City in addition to the Regional Planning Commission/Metropolitan Planning Organization (MPO), the State of NH Departments of Transportation and Environmental Services, NH Department of Health and Human Services, and the State Division of Historic Resources. Within the Community Development Division the Departments of Urban Programs, Transportation, Parking, Code Enforcement, Planning, Zoning, Building and Community Development work closely and cooperatively to implement the goals of the Consolidated Plan. Examples of cooperation include the distribution of the Consolidated Plan Resident Survey through the Nashua Transit System bus service and partnership with Code Enforcement and Building to begin the process of revising renovation standards to include "green building design".

The Urban Programs Department, who has primary responsibility for carrying out the Consolidated Plan, collaborates on state-wide efforts with the NH Housing Finance Authority on topics such as lead-paint, healthy housing and HOME funded affordable housing projects.

The Nashua Regional Planning Commission works closely with the Community Development Division on regional planning topics such as infrastructure, energy resources, fair housing and housing resources. In addition, the Nashua Regional Planning Commission serves as the regional MPO coordinating transportation related infrastructure funding through the state and federal government for both the Nashua Transit System and transportation infrastructure related funding within the City and region.

Regional partnerships support HUD's Office of Economic Resilience, Sustainable Communities Planning grant. This program supports regional planning efforts that integrate housing and transportation decisions, and increase state, regional, and local capacity to incorporate livability, sustainability, and social equity values into land use plans and zoning. In this area, the Nashua Regional Planning Commission was awarded and oversees the funds that would benefit Nashua. The Consolidated Plan is only one example of long-term planning that integrates the above concepts into our funded activities.

Other Economic Resilience partnerships include regional planning initiatives with the Greater Nashua Public Health Emergency Preparedness, regional environmental/sustainability initiatives through the Nashua Regional Planning Commission, and the Souhegan Mutual Aid program for hazardous materials. The City is also looking for other opportunities to support regional resilience planning through programs by the US Department of Housing and Urban Development and the US Environmental Protection Agency.

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation

Summarize citizen participation process and how it impacted goal-setting

During the Action Plan process we rely on Public Hearings and the regularly scheduled Human Affairs Committee meetings to obtain input on this year's goals. Two public hearings were (will be) conducted, in addition to the Human Affairs Committee meetings, providing the public the opportunity to comment throughout the Plan development.

This was the second year of the revamped Citizen's Advisory Commission. This group is comprised of seven Nashua residents, representing a cross-section of backgrounds, responsible for reviewing proposals related to human services (both CDBG and general fund). The Ordinance governing this group was changed to place its oversight in the Community Development Division, with the Urban Programs Manager as the staff liaison. This allows for integration with the CDBG process/timeline and a more seamless flow with the public service review process.

The Action Plan is built upon the goals and priorities identified in the Consolidated Plan which was developed using intensive public participation. Annual plans do not see the same level of participation and we rely heavily on the ConPlan to help direct funding over the course of the 5-years. Citizen participation was an integral component in developing the Consolidated Plan. During the Consolidated Plan process, in an attempt to reduce the burden of attending on-site collaborative sessions, the City utilized technology to access citizens. Recognizing many citizens do not like public speaking or public forums, we created an online survey through SurveyMonkey®. The survey link was advertised in the newspaper, on the City's webpage, announced at televised public meetings and emailed to service agencies. Posters with a QR code were posted in every city bus, in grocery stores and throughout the city. This allowed users with a smart phone or tablet to access the survey on the go. Paper copies were available at the Senior and Transit Centers. The survey was available for approximately eight weeks and collected 259 responses.

During development of the ConPlan, a focus group, attended by a cross section of agencies, was held on March 19, 2015. Representation from the City's non-profit agencies, Continuum of Care, financial, police, fire, schools and housing agencies were in attendance. Participants were given remotes to vote on topics in order to prioritize needs. Break-out groups were assigned at random to various topics to discuss goals. The final step allowed all participants to vote on the goals to prioritize the goals amongst the needs.

All of the consultation and citizen participation efforts impacted the prioritization of the goals listed in the Plan. The raw data provided throughout this Plan helps demonstrate need; yet community input is needed to direct the limited resources to their most critical needs/goals. In addition to the efforts listed here, Section PR10 – Consultations, offers details on who was contacted to develop the 5-year plan.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-targeted/broad community	See AP-05 section 4 for details of citizen participation	No comments received	None	
2	Public Hearing	Non-targeted/broad community	See AP-05 section 4 for details of citizen participation	Verbal comments received at the public hearings were in support of the proposed activities and in favor of CDBG funding in general. See AP-05 section 5 for details of comments received.	None	
3	Newspaper Ad	Non-targeted/broad community	Advertisements of public hearings	N/A - no comments received related to public notices/newspaper ads	None	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Internet Outreach	Non-targeted/broad community	N/A - social media promotion of Action Plan process	N/A - no comments received related to internet outreach/postings	N/A	
5	Public Meeting	Non-targeted/broad community	Citizens Advisory Commission meeting to discuss public service requests	No members of the public commented	N/A	
6	Public Meeting	Non-targeted/broad community	Citizens Advisory Commission meetings to discuss public service requests	No members of the public commented	N/A	

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

The City anticipates the following resources during FY2020 to address Consolidated Plan needs.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	646,750	30,000	394,827	1,071,577	0	Prior year includes: Housing rehab carried forward \$60,153 (of that \$24,223 is PI); Activity balances of \$114,673.84 reprogrammed; Park projects \$150,000; and E for All \$70,000 carried forward (note this \$70,000 includes the Revolving Loan Balance of \$46,646 reprogrammed to this activity). Prior year further detailed in AP-90.Expected amt: This is the final year of the current Consolidated Plan.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	359,905	25,000	652,795	1,037,700	0	Prior year funding based on PR27 report = \$605,795 + \$50,000 program income.Expected amt: This is the final year of the current Consolidated Plan.
Continuum of Care	public - federal	Housing	1,936,674	0	0	1,936,674	0	HUD funds awarded to the Greater Nashua Continuum of Care to address homeless needs (rental, transitional, supportive housing and services).
General Fund	public - local	Public Services	512,000	0	0	512,000	0	Local funds through the Mayor's budget for human service activities

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Public Housing Capital Fund	public - federal	Housing	12,999,463	0	0	12,999,463	0	2019 Operating Subsidy: \$2,113,200; 2019 Capital Fund Program: \$1,331,913 2019 Housing Choice Voucher Program (includes PBV):\$9,179,950 2019 Single Room Occupancy: \$374,400
Other	private	Housing	75,000	0	0	75,000	0	Private funds, in the form of property owner contributions, toward Lead Hazard Control Grant projects.
Other	public - federal	Housing	750,000	0	0	750,000	0	HUD Lead Paint & Healthy Homes grant 1/2018 to 12/2021. Approx amount to be spent during program year.

Table 5 - Expected Resources – Priority Table

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

Resources from private and non-Federal public sources are expected to leverage the federal funds detailed above, such as private contributions to Subrecipients, Low Income Housing Tax Credits, historic tax credits, and conventional mortgage products. Many of the City's grants require non-federal match. In these cases the federal grants leverage private resources (as described above) such as owner contributions, in-kind and donated/discounted services.

HOME Match: Each HOME project is evaluated to determine the amount of match provided during the underwriting phase by reviewing the proposal to identify eligible match. Since match can be “banked” and credited to future projects, some projects will offer higher or lower amounts of match. The City tracks match on a cumulative basis to ensure the minimum 25% is met.

Match is tracked using an Excel spreadsheet identifying the project contributing match, the value of match, date recognized, match source, annual Disbursement Requiring Match (from PR-33) and running match balance (credit). Documentation of match varies depending on type. Income received would be checks received; value of volunteer labor/materials documented through a final report upon project completion; cash match/private funds would be proof of grant awards/distributions, etc

Eligible match can be cash (but not owner equity), services, labor and donated materials/equipment, waived taxes or fees, value of donated land, cost of infrastructure improvements, or other resources that become a permanent contribution to affordable housing. Direct costs of supportive services to residents of HOME projects can also be considered as match.

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

There are no plans to develop public land in the upcoming year to address Consolidated Plan needs.

Discussion

No additional discussion

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Rental Housing	2015	2019	Affordable Housing		Production of Rental Housing	HOME: \$781,471	Rental units constructed: 8 Household Housing Unit
2	Homeowner Rehab	2015	2019	Affordable Housing		Rehabilitation of Existing Units	CDBG: \$149,153	Homeowner Housing Rehabilitated: 20 Household Housing Unit
3	Rental Rehab	2015	2019	Affordable Housing		Rehabilitation of Existing Units	CDBG: \$54,894	Rental units rehabilitated: 5 Household Housing Unit
5	Improvements to facilities for youth	2015	2019	Non-Homeless Special Needs		Public Facilities	CDBG: \$84,024	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 304 Persons Assisted
6	Improvements to facilities for special needs pop	2015	2019	Non-Homeless Special Needs		Public Facilities	CDBG: \$93,094	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 221 Persons Assisted
8	Ensure safe sanitary housing	2015	2019	Affordable Housing		Rehabilitation of Existing Units	HUD: \$750,000 Match: \$75,000	Rental units rehabilitated: 60 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
10	Parks/Trails/Green space	2015	2019	Non-Housing Community Development		Public Improvements and Infrastructure	CDBG: \$250,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 16250 Persons Assisted
11	Public Services - Youth	2015	2019	Non-Housing Community Development		Public Services	CDBG: \$39,257	Public service activities other than Low/Moderate Income Housing Benefit: 485 Persons Assisted
12	Public Services - Special Needs	2015	2019	Non-Housing Community Development		Public Services	CDBG: \$11,000	Public service activities for Low/Moderate Income Housing Benefit: 10 Households Assisted
14	Public Services - General	2015	2019	Non-Housing Community Development		Public Services	CDBG: \$22,968	Public service activities other than Low/Moderate Income Housing Benefit: 822 Persons Assisted
17	Economic Development - general	2015	2019	Non-Housing Community Development		Economic Development	CDBG: \$110,000	Businesses assisted: 40 Businesses Assisted
18	Homeownership	2015	2019	Affordable Housing		Homeownership	HOME: \$250,000	Homeowner Housing Added: 2 Household Housing Unit
19	Homelessness	2015	2019	Homeless		Homelessness	CDBG: \$75,000	Homeless Person Overnight Shelter: 77 Persons Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Rental Housing
	Goal Description	This goal covers potential rental housing production under the HOME program. Specific projects are identified on a rolling basis throughout the program year. Funds reflect current year Affordable Housing Development (\$269,929); CHDO (\$53,986); estimated program income (\$25,000) and Prior Year balances (\$405,556).
2	Goal Name	Homeowner Rehab
	Goal Description	Homeowner Housing Rehabilitated: 20 Household Housing Unit (\$89,000 current, \$60,153 prior year funds)
3	Goal Name	Rental Rehab
	Goal Description	New pilot program for housing rehab of rental units (1-8 units). Funds reflect prior year reprogrammed from FY18 HIP program income.
5	Goal Name	Improvements to facilities for youth
	Goal Description	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 304 Persons Assisted. Children's Home (10); PAL (252); Youth Council (42)
6	Goal Name	Improvements to facilities for special needs pop
	Goal Description	Assistance to PLUS Company (139); Opportunity Networks (82)
8	Goal Name	Ensure safe sanitary housing
	Goal Description	This goal reflects units assisted under the HUD Lead Paint & Healthy Homes Program
10	Goal Name	Parks/Trails/Green space
	Goal Description	Projects covered by this goal include: Labine Park restroom (3670 LMA); Splash Pad @ Rotary Pool (7760 LMA); Salem Street Tot Lot rehab (1,005 ppl) and Crown Hill Pool rehab (3,815 ppl)

11	Goal Name	Public Services - Youth
	Goal Description	Adult Learning Center (50 LMC); PAL 00 (360 LMC); Girls Inc (75 LMC)
12	Goal Name	Public Services - Special Needs
	Goal Description	Operating support of Marguerite's Place – transitional housing facility (10 Persons Assisted)
14	Goal Name	Public Services - General
	Goal Description	Public service activities for Low/Moderate Income Housing Benefit: 822 Individuals assisted. (Dental Connection)
17	Goal Name	Economic Development - general
	Goal Description	Assistance to E for All – support of micro enterprise development (40 LMC)
18	Goal Name	Homeownership
	Goal Description	This goal covers potential home ownership production under the HOME program. Specific projects are identified on a rolling basis throughout the program year. Funds would be allocated toward creation of new home owner units, not homebuyer assistance.
19	Goal Name	Homelessness
	Goal Description	Assistance to Nashua Soup Kitchen – asbestos remediation at 35 Spring Street to create new shelter

Projects

AP-35 Projects – 91.220(d)

Introduction

Projects/activities that will take place during the program year to address the priority needs and specific objectives identified in the Consolidated Plan can be found listed in the attached Resolution(s). Some prior year projects have been pulled into this Action Plan. In certain instances the planned project/activity experienced unforeseen delays, technical issues or was planned to occur in a later year. Particulars are noted in the individual project narratives. See attached R-19-126A for additional details.

Projects

#	Project Name
1	Public Services-Youth
2	Public Services - General
3	Public Services - Special Needs
4	Public Facility Improvements - Nashua Children's Home
5	Public Facility Improvements - Police Athletic League
6	Public Facility Improvements - Nashua Youth Council
7	Public Facility Improvements - Nashua Soup Kitchen and Shelter
8	Public Facility Improvements - Opportunity Networks
9	Public Facility Improvements - PLUS Company
10	Park Improvement Projects
11	Housing Improvement Program
12	Rental Rehab Program
13	Micro-Enterprise Development
14	HOME Affordable Rental Housing Development
15	Administration
16	Project Delivery
17	Homeownership
18	CHDO Housing Development

Table 7 - Project Information

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

The primary objectives of the activities listed are to benefit low-income and moderate-income residents. The resources covered by this Plan will be directed to those areas of the City where the highest concentrations of low-moderate income individuals reside.

The public facility and improvement projects that will receive funding meet eligibility criteria by providing services that directly benefit low and moderate-income served at the facility.

The greatest obstacle to meeting underserved needs is the limited availability of funding. The HOME Program suffered a 50% reduction in 2012 and has yet to be fully reinstated since that time. This year's allocation is still 27% lower than the pre-2012 cut. The cost to developing affordable housing continues to increase, creating greater discrepancies each year. Yet the program is still 20% lower than in 2012. The City's CDBG program was funded less than last year and has been nearly level funded for the past several years, which erodes the City's ability to meet needs.

The City of Nashua addresses this obstacle by pursuing other grant opportunities, such as the Lead Paint & Healthy Homes Program; collaborating with neighboring communities to share "lessons learned"; using best practice guidelines, systems, and previously created documents. Despite these efforts, Nashua, like all communities, continues to be faced with increased reporting requirements and compliance issues. Maintaining transparency and a high level of conduct requires extensive staff time.

AP-38 Project Summary

Project Summary Information1	Project Name	Public Services-Youth
	Target Area	
	Goals Supported	Public Services - Youth
	Needs Addressed	Public Services
	Funding	CDBG: \$63,045
	Description	Public services are those activities that benefit low-moderate income clients or low-mod areas through the provision of services (versus physical projects).
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Benefit of LMC at or below 80%, many less than 50%. The following three agencies will be assisted: Adult Learning Center -(39 LMC); Boys & Girls Club (266 LMC); Police Athletic League (365 LMC)
	Location Description	Adult Learning Center - 4 Lake Street Nashua, NH; Boys & Girls Club - 1 Positive Way Nashua, NH; Police Athletic League - 52 Ash Street Nashua, NH
	Planned Activities	Adult Learning Center - Funds will subsidize the cost of daycare tuition to lower cost to eligible families; ALC is an educational agency designed to provide the academic skills, job training and support services needed for adults and young adults to achieve more productive lives for themselves and their children. Boys & Girls Club - Funds will provide membership scholarships under the Hispanic Enrollment Program; Their mission is to enable all young people, especially those who need us most, to reach their potential as productive, caring, responsible citizens. PAL - General operating support of afterschool program; PAL offers sponsored sports, activities and enrichment programs focused on youth living in "at risk" neighborhoods; eliminate barrier to participation for all youth by providing PAL programs at no cost or reduced cost; promote health, fitness, and education while instilling the values of good character; reduce and eliminate substance abuse and other juvenile delinquent behavior.
2	Project Name	Public Services - General
	Target Area	

	Goals Supported	Public Services - General
	Needs Addressed	Public Services
	Funding	CDBG: \$22,968
	Description	Public services are those activities that benefit low-moderate income clients or low-mod areas through the provision of services (versus physical projects).
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Approx 822 very low income individuals
	Location Description	31 Cross Street Nashua, NH
	Planned Activities	The eligible public service activity is providing free/reduced cost dental care to Low Moderate Income persons. The city will provide perating support to Greater Nashua Dental Connection to purchase and install upgraded computer technology/systems. GNDC offers care to those who are eligible for benefits, as well as low-cost services to those without insurance or benefits. They offer significantly reduced fees to make quality care more accessible to those who may not be able to afford dental care on a regular basis.
3	Project Name	Public Services - Special Needs
	Target Area	
	Goals Supported	Public Services - Special Needs
	Needs Addressed	Public Services
	Funding	CDBG: \$11,000
	Description	Public services are those activities that benefit low-moderate income clients or low-mod areas through the provision of services (versus physical projects).
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	10 very low-income households
	Location Description	87 Palm Street Nashua, NH

	Planned Activities	Operating support of Marguerite’s Place – funds will be directed to the cost of utilities at the housing facility. Marguerite’s Place, Inc. helps women with children achieve self-sufficiency by providing them with safe, stable, transitional housing along with emotional, educational and supportive services.
4	Project Name	Public Facility Improvements - Nashua Children's Home
	Target Area	
	Goals Supported	Improvements to facilities for youth
	Needs Addressed	Public Facilities
	Funding	CDBG: \$39,024
	Description	Nashua Children's Home provides care and stability to boys and girls unable to remain with their families, special education services for students who have not been successful in public school settings, and supportive housing for youth that have aged-out of care.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	10 very low income youth
	Location Description	86 Concord Street, Nashua
Planned Activities	Approximately 44 windows to be replaced at youth group housing facility for girls age 15-18.	
5	Project Name	Public Facility Improvements - Police Athletic League
	Target Area	
	Goals Supported	Improvements to facilities for youth
	Needs Addressed	Public Facilities
	Funding	CDBG: \$20,000

	Description	Nashua PAL offers sponsored sports, activities and enrichment programs. Their goals include building friendship and trust among police officers and city youth by providing opportunities to interact in positive environments, such as sports, activities and enrichment programs; provide focused PAL programs for youth living in "at risk" neighborhoods; eliminate barrier to participation for all youth by providing PAL programs at no cost or reduced cost; promote health, fitness, and education while instilling the values of good character; reduce and eliminate substance abuse and other juvenile delinquent behavior.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 252 low-moderate income children served
	Location Description	52 Ash Street, Nashua
	Planned Activities	Fire safety improvements, including sprinkler system, fire alarm panel, fire doors, egress, handrails and other related corrections.
6	Project Name	Public Facility Improvements - Nashua Youth Council
	Target Area	
	Goals Supported	Improvements to facilities for youth
	Needs Addressed	Public Facilities
	Funding	CDBG: \$25,000
	Description	Nashua a Youth Council fills a critical niche for young people at the intersection of law enforcement, education, substance misuse and mental health symptoms.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Approx 42 low-moderate income youth served
	Location Description	112 West Pearl Street, Nashua
	Planned Activities	Heating System replacement for 2nd and 3rd floors of building
7	Project Name	Public Facility Improvements - Nashua Soup Kitchen and Shelter

	Target Area	
	Goals Supported	Homelessness
	Needs Addressed	Homelessness
	Funding	CDBG: \$75,000
	Description	Redevelopment of former school building to shelter and transitional housing facility.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 77 very low income individuals
	Location Description	35 Spring Street, Nashua
	Planned Activities	Funds applied toward the cost of asbestos remediation to ready the site for redevelopment into a shelter.
8	Project Name	Public Facility Improvements - Opportunity Networks
	Target Area	
	Goals Supported	Improvements to facilities for special needs pop
	Needs Addressed	Public Facilities
	Funding	CDBG: \$50,000
	Description	Opportunity Networks provides vocational opportunities and activities that promote life-enhancing skills for adults with developmental and acquired disabilities.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Approx. 82 very low & low income individuals.
	Location Description	116 Perimeter Road, Nashua
	Planned Activities	Accessibility and safety improvements, including ADA compliant doors and ADA bathroom renovations.
9	Project Name	Public Facility Improvements - PLUS Company
	Target Area	
	Goals Supported	Improvements to facilities for special needs pop
	Needs Addressed	Public Facilities

	Funding	CDBG: \$43,094
	Description	The PLUS Company, Inc. goals and objectives include to maximize options for vocational, social and financial independence, and integration for adults with disabilities. The PLUS Company, Inc. has shifted away from sheltered workshops to inclusive employment opportunities with the community. Group homes are giving way to individually supported home environments.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Approx. 139 very low income individuals
	Location Description	19 Chestnut Street, Nashua
	Planned Activities	Replacement of 5 roof-top HVAC units.
10	Project Name	Park Improvement Projects
	Target Area	
	Goals Supported	Parks/Trails/Green space
	Needs Addressed	Public Improvements and Infrastructure
	Funding	CDBG: \$150,000
	Description	Improvements to public parks
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Low-Mod Area Benefit; Labine Park restrooms (3670 LMA); Splash Pad @ Rotary Pool (7760 LMA); Salem Street Tot Lot rehab (1,005 ppl)
	Location Description	
Planned Activities	Labine Park - restroom rehabilitation; Rotary pool splash pad - installation of a new splash pad adjacent to existing pool Salem Street Tot Lot - rehab of park to include new play structures, land improvements/landscaping	
11	Project Name	Housing Improvement Program
	Target Area	
	Goals Supported	Homeowner Rehab

	Needs Addressed	Rehabilitation of Existing Units
	Funding	CDBG: \$149,153
	Description	Owner-occupied housing rehab; funding reflects \$60,153 carried forward from prior year balance plus \$89,000 allocated this program year.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Approx. 20 housing units/LMC - estimated 5 @ 30% AMI, 10 @ 50% AMI, 5 @ 80% AMI
	Location Description	Throughout the city.
	Planned Activities	Financial and technical assistance to eligible low-moderate income, owner-occupants in for essential repairs of 1-4 family residential properties. Financial assistance provided in the form of 0% deferred payment loans and/or grants for certain emergency work, as described in the Program's Guidelines. Minor rehab including code and safety corrections, repairs, accessibility, etc. Repayment of prior HIP loans, in excess of annual estimated program income, shall be added to this loan pool during the program year. Emergency work, costing at least \$1,000 and up to \$5,000, may be offered in the form of a grant rather than a loan to owners at or below 30% AMI. Owners earning above 30% AMI may be offered assistance in the form of a loan.
12	Project Name	Rental Rehab Program
	Target Area	
	Goals Supported	Rental Rehab
	Needs Addressed	Rehabilitation of Existing Units
	Funding	CDBG: \$54,894
	Description	Rehabilitation program for non-owner occupied properties, serving low income tenants.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Approx. 5 rental units, occupied by low-income tenants.
	Location Description	City-wide

	Planned Activities	Pilot program utilizing reprogrammed funds from FY18 HIP loan pool, offering 0% interest, deferred payment loans for essential repairs of residential rental properties containing 1-8 units, occupied by income eligible tenants. Financing and other terms more fully described in the Program's Guidelines. Properties located in the City's lowest income census tracts will receive priority.
13	Project Name	Micro-Enterprise Development
	Target Area	
	Goals Supported	Economic Development - general
	Needs Addressed	Economic Development
	Funding	CDBG: \$110,000
	Description	Provision of assistance toward development of micro-enterprises or persons interested in creating a micro-enterprise (a business of five or fewer employees, of which one is the owner). Funds include \$70,000 from prior year carried forward to this Action Plan and \$40,000 allocated this program year. Note, the \$70,000 prior year funds is a combination of the Revolving Loan Balance \$46,646 and other activities that either came in under budget or were cancelled. The \$70,000 allocation shall be reflected in an Amended Action Plan for program year 2018, as the change was made mid-year.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Approx 40 low-moderate income individuals.
	Location Description	
	Planned Activities	Assistance to "Entrepreneurship for All (E for All)" to provide technical assistance, business support, training and grants to micro-enterprise businesses, with a focus on underserved populations (i.e. new Americans, women, minorities)
14	Project Name	HOME Affordable Rental Housing Development
	Target Area	
	Goals Supported	Rental Housing
	Needs Addressed	Production of Rental Housing
	Funding	HOME: \$697,724

	Description	This goal covers affordable rental housing production under the HOME program. Specific projects are identified on a rolling basis throughout the program year. Funds reflect current year Affordable Housing Development (\$269,929); estimated program income (\$25,000) and Prior Year balances (\$402,795). Note, funding for this project is estimated and may be increased/decreased depending on proposals received. Changes in funding will be made proportionately to the Homeownership Project if needed.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approx 6 low income households; distribution of income level will vary depending on the specific proposals. There are normally some units targeted toward 50% AMI, occasionally some developers target 30% AMI and in all cases households would not be higher than 80% AMI.
	Location Description	Projects accepted on a rolling basis - sites may be selected throughout the City of Nashua.
	Planned Activities	Acquisition, new construction and/or substantial rehab of affordable housing developments.
15	Project Name	Administration
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$135,350 HOME: \$35,990
	Description	Program administration for CDBG.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Admin benefits all goals, projects, needs and activities carried out under this plan.
	Location Description	
	Planned Activities	General administration and planning costs of carrying out the CDBG, HOME and other related HUD projects by the Urban Programs Department, including but not limited to regulatory compliance monitoring, IDIS management, preparation of required grant reports, advertising, recording fees, etc.
16	Project Name	Project Delivery

	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$115,000
	Description	Direct costs related to carrying out housing rehab programs. Costs cover 100% of salary/fringe of the Rehab Specialist and 25% of the Grant Management Specialist (S&F).
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Project delivery is directly tied to housing rehab projects.
	Location Description	Individual projects are located throughout the City, based on eligible properties/owners.
	Planned Activities	Construction management related Housing Rehab Programs, including but not limited to the direct cost of the Urban Programs Department staff to conduct environmental reviews, drafting scope of work, preparation of bid documents, bidding, construction management and Davis Bacon compliance (where applicable).
17	Project Name	Homeownership
	Target Area	
	Goals Supported	Homeownership
	Needs Addressed	Homeownership
	Funding	HOME: \$250,000
	Description	Home ownership production under the HOME program. Specific projects are identified on a rolling basis throughout the program year. Funds shall be directed toward creation of new home owner units, not home buyer assistance. Amount of funding is estimated and may increase or decrease depending on proposed projects. Funding for Increases/Decreases will relate to the General Affordable Housing Project identified as rental development.
	Target Date	7/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	We anticipate at least two low-income households will be assisted.

	Location Description	Projects are accepted on a rolling basis - sites may be located throughout the City of Nashua.
	Planned Activities	Acquisition, rehab and/or new construction to create homewonership opportunities for low-income households.
18	Project Name	CHDO Housing Development
	Target Area	
	Goals Supported	Rental Housing
	Needs Addressed	Production of Rental Housing
	Funding	HOME: \$53,986
	Description	Set aside of 15% of annual grant, allocated toward Community Housing Development Organizations (CHDO), non-profits with a mission to create affordable housing.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately two low-income households
	Location Description	Proposals accepted on a rolling basis. Sites may be located throughout the City of Nashua.
Planned Activities	CHDO housing development is almost always combined with general HOME Affordable Housing, as the 15% set-aside is not enough to fill the developent subsidy gap. Funds may be applied to acquisition, rehab and/or new construction.	

AP-50 Geographic Distribution – 91.220(f)

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

At this time, the City does not have a formal target area. The primary objectives of the activities within this Plan are to benefit low-income and moderate-income residents. The resources covered by this Plan will be directed to those areas of the City where the highest concentrations of low-moderate income individuals reside.

The public facility and improvement projects that receive funding meet eligibility criteria by providing services that benefit low and moderate-income persons living throughout the community.

Rationale for the priorities for allocating investments geographically

By nature activities occur in low-income areas. The City has not prioritized based on a geographic area, rather the priority is driven by the beneficiary (i.e. youth, homeless, special needs, etc).

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

This section reflects households provided affordable housing that meets the definition at 24 CFR 92.252. The # of units reflects the estimated households assisted under the HOME program. We estimate 6 rental units through general affordable housing development; 2 rental units under CHDO development; and 2 units under home ownership development, for a total of 10 units. Since proposals are accepted on a rolling basis, it is difficult to estimate whether these units will be new construction, rehab of existing units, acquisition or a combination. The distribution below is an estimate.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	10
Special-Needs	0
Total	10

Table 8 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	8
Rehab of Existing Units	2
Acquisition of Existing Units	0
Total	10

Table 9 - One Year Goals for Affordable Housing by Support Type

Discussion

Applications for HOME development projects are accepted on a rolling basis throughout the year. The numbers above reflect projects in the pipeline or inquiries that we anticipate becoming projects during the year. As of this writing there are no formal applications pending/in the pipeline. Estimate of 10 units is relative to the amount of funding available.

AP-60 Public Housing – 91.220(h)

Introduction

The City has limited resources to assist the needs of the Nashua Housing and Redevelopment Authority (NHRA) and its clients, especially when compared with the needs of those who do not have access to affordable housing. However, as the quality of the living environment for residents is critical to the neighborhoods where public housing is placed, the City will do everything it can to support revitalization efforts.

As the Responsible Entity, the City conducts the environmental reviews for the NHRA. These are done according to the terms of an Agreement. The City recently added the NHRA to our Programmatic Agreement with NH SHPO to streamline historic review. The City dedicates significant time to preparing these reviews and considers this support critical to the NHRA's operations and ability to maintain its housing stock.

NHRA has established a 501c3, Nashua Affordable Housing Corporation. NHRA is in the planning stages of changing the face of public housing through alternative affordable housing solutions within the City of Nashua and surrounding communities.

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

The Nashua Housing and Redevelopment Authority plans the following actions during the next year to address public housing needs and Section 8 Housing Choice Voucher Program goals:

- J Apply for additional Section 8 Housing Choice Vouchers, should they become available.
- J Utilize Project Based Vouchers to provide additional low income housing choices to the community.
- J Continue to achieve acceptable scores within the Public Housing Assessment (PHAS) system. NHRA was designated a Standard Performer in 2018 – NHRA will make every effort to increase its designation.
- J Strive to maintain high performer status under the existing Section Eight Management Assessment Program (SEMAP) standards. A High Performer Status was achieved under SEMAP during 2018.
- J Plan for alternative affordable housing opportunities under HUDs Rental Assistance Demonstration program, or any other programs available to the NHRA.
- J Ongoing oversight and incorporation of bi-annual development and unit inspections to ensure properties meet or exceed HUD standards.
- J Plan and assess capital improvements to NHRA's public housing stock in order to improve the sustainability of its properties. A full review of NHRA's five-year capital improvement plan was completed, and work is ongoing to address some of these needs. Recent work completed included roof, siding, window and door replacements at multiple developments. Upcoming work will continue to address the building envelopes at public housing developments.
- J Finalize environmental site assessments (and any required mitigation) at all housing sites.

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

The Nashua Housing and Redevelopment Authority has a Resident Advisory Board (RAB) consisting of public housing residents and Section 8 participants. The Executive Director meets with the RAB annually to discuss any programmatic opportunities and plans for new initiatives. RAB members participate in the creation and acceptance of NHRA's Annual PHA Plan, and work together with NHRA staff to address common goals and objectives. Should any opportunities present themselves to encourage home ownership, NHRA will act on those opportunities. The NHRA does not currently have a program in place to encourage home ownership. However there may be opportunity to partner with the City to target marketing of the HOME-funded home buyer assistance program to public housing residents. This effort is contingent on whether that program launches in the plan year.

The NHRA plans to continue the following initiatives to involve residents:

- J Meetings with residents to encourage and promote the start-up of Resident Associations to promote socialization and special community activities run by the resident leadership of the Association.
- J Meetings with residents to encourage and assist in starting Crime Watch groups at developments showing a need or desire to have one.
- J NHRA representation at all Resident Association meetings with management acting as a liaison between residents and NHRA.
- J Involvement from the Resident Advisory Board (group of individuals from public housing and Section 8 selected to serve on this Board) in the planning and development of NHRAs required Annual and Five-Year Plan.
- J Educational sessions provided to residents on site on important health and safety topics (bed bug awareness, fire prevention, etc.)
- J Management will work closely with local and state agencies such as the Welfare Dept., Health Dept., mental health providers, and family services providers to determine assistance needed for NHRA families.
- J Management will collaborate with local community agencies to provide services and programs for NHRA residents.
- J Monthly review of all criminal activity reports supplied by the local police department to coordinate efforts to resolve and/or prevent further problems.
- J Management develops and conducts efforts to involve families in community activities such as development beautification events.
- J NHRA representation at a multitude of community networking and service provider meetings.

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

NHA achieved a designation of *Standard Performer* in 2018.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The Greater Nashua Continuum of Care (GNCOC) is the primary decision making group that manages the overall planning effort for the entire COC. The communities served by the COC include Nashua, Brookline, Amherst, Hollis, Merrimack, Milford, Mont Vernon, Hudson, Litchfield and Mason. The GNCOC utilizes federal, state and private funds to address the needs of the homeless, including competitive HOPWA grants. Limited resources covered by this Plan are directed toward Homelessness. However, the City as a whole and many of its Divisions work to address this need outside of Plan resources. Information relating to the GNCOC's goals was obtained from their annual HUD reports.

For virtually all homeless individuals and families, decent, safe, affordable housing is a critical step in ending homelessness. In some cases, this is their only need. Often, in addition to affordable housing, the homeless also need supportive services to make the transition to independent living or to deal with other problems. Common issues include substance abuse, mental illness, childcare, transportation, life skills, job training and other basic life skills.

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

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

The City is represented at the GNCOC by the Manager of the Welfare Department, a department within the City of Nashua's Division of Public Health & Community Services (DPHCS). The Welfare Officer is a member of the GNCOC Executive Board and also chairs the GNCOC Ending Homelessness sub-committee. The Ending Homelessness sub-committee was very active in the creation and implementation of the Coordinated Entry process for the Greater Nashua community, working with partner agencies to provide clients access to necessary homeless prevention and shelter services, including chronically homeless individuals and families and veteran populations. The City's DPHCS also provides outreach to homeless and at-risk members of the community through health activities on the Outreach Van.

Three barriers identified by the COC for those who are unsheltered are: reluctance to go to shelter, lack of transportation, and lack of ID. To address these barriers, outreach providers can house individuals directly from unsheltered situations, provide transportation and bus tickets to services, and purchase birth certificates and ID cards.

The GNCOC will continue to implement several strategies which include: providing clients with documents needed for employment (identification cards and birth certificate), refer to job employment programs which help clients to obtain their GED-TASC and assist with resume writing, allow the homeless to use their address of job applications, SOAR Team Members assist by walking people through the process of signing up for benefits. GNCOC will also provide clients with a list of agencies that will hire sex offenders and those with a criminal background.

Specific outreach to the LGBT population and training to providers is also a priority. Southern NH HIV/AIDS Task Force is a non-profit AIDS Service Organization providing affordable housing, case management, and supportive services including access to medical care and medications to individuals and families living with HIV/AIDS and offers HIV testing and counseling to those at risk of HIV infection. As a member of the GNCOC, this agency offers a unique, holistic approach to care and prevention resulting in better outcomes for clients and community. While this Task Force is the lead agency, no GNCOC agency discriminates with regards to LGBT, and these agencies are trained on a regular basis on providing equal access to HUD Programs. Agencies also receive a list of resources to refer LGBT individuals to depending upon their need. Any client or community member with a discrimination claim due to HIV status or LGBTQIA identity are referred to GLAD – Gay and Lesbian Advocates and Defenders – New Hampshire.

In order to better identify and assess the needs of homeless youth, the GNCOC has partnered with the Balance of State COC (BOSCO) where COC leadership engaged the statewide Youth Subcommittee, which includes COC funded programs, child protection and juvenile justice staff, NH's Runaway and Homeless Youth programs (administered by Child and Family Services – CFS), and members of the former NH Homeless Teen Task Force, State Representatives, the Department of Education, and school district McKinney Vento homeless liaisons to increase PIT count participation by youth centered providers.

The GNCOC conducts an event, the Employment Connect annually at the Nashua Public Library. This event is targeted toward at-risk and homeless individuals to link with employment resources.

Addressing the emergency shelter and transitional housing needs of homeless persons

The Greater Nashua Continuum of Care continues to work to improve and streamline their Coordinated Entry process. Currently a phone line offers 24-hour response. A caller leaves a message with pertinent information and the assigned provider returns the call with shelter availability information. Plans to improve and streamline the process are ongoing. Goals include refining the intake form, continued training for participating providers and better data collection.

There are three emergency shelters operating in Nashua, two receiving some Emergency Solutions Grant (ESG) funds as well as several agencies with transitional housing programs. The shelter programs have relationships with the two local hospitals to provide support for individuals seeking services from the Emergency Department for behavioral health issues, and provide emergency shelter once they are discharged from the hospital.

All GNCOC participating agencies have programs established for the purpose of providing emergency or transitional housing. Each of these programs offers supportive services tailored to the client's needs. Services provided will include case management covering education, daycare, budgeting, interviewing, resume writing, employment skills, legal aid and counseling to assist individuals and families.

Under the ESG program the GNCOC has a goal that 70% of participating households will achieve housing stability for six months following the end of rental assistance and that 50% of participants will maintain or have increased their income at program exit, demonstrating sufficient income to maintain housing.

The GNCOC has established a practice of using the "no-wrong" door approach for families entering the systems. Clients are addressed in the Coordinated Entry System to identify a person's barriers to achieve stable housing. Families are prioritized based upon their complex, co-occurring issues that are

likely to impact housing stability. This approach involves quickly connecting homeless families within 30 days to permanent housing without preconditions and barriers to entry by performing intake, assessment, prioritization, housing location, move-in, case management, and on-going follow-up. Supportive services help to maximize housing stability and work to prevent the return to homelessness. Coordinated entry/shelters work with families on reunification with friends and/or family that may help while connecting them to resources to improve their situation to assist with housing stability on their own.

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

The GNCOC has been successful in having a high rate of individuals and persons in families in permanent housing projects, other than rapid rehousing, retain their permanent housing or exit to permanent housing destinations. The percentage last year was 96% to which they plan to meet or exceed this program year.

The number exiting to permanent housing projects which included Rapid Rehousing was much lower at 51%. In order to increase this percentage, the GNCOC is placing a concentrated focus on exits to permanent housing. Client destination is a primary factor examined on the CoC's Data Quality and Completeness Report. Along with this, the CoC is also refining its by-name list procedure to make the list more accurate, simpler, and actionable thereby increasing the speed and volume of persons exiting from the street, ES, and TH to permanent housing destinations. The CoC continues to work on delivering evidence-based, high quality case management training. This includes training case managers to utilize the CoC-required Full SPDAT assessment, Motivational Interviewing, and Housing Stabilization. Harbor Homes Inc. a funded agency is responsible for overseeing this measurement.

The GNCOC is part of the state's Homeless Youth Subcommittee, which provides overarching strategy and TA to end youth homelessness. Additionally, GNCOC is working with the neighboring Manchester COC, and the consultant they hired to set benchmarks and receive TA around ending youth homelessness. The model closely follows GNCOC's efforts around ending veteran homelessness, achieved in 2017. Of note, there is significant underfunding to address youth homelessness in NH, partly because the state lacks data to demonstrate the need for federal funding in particular. To address this, Harbor Homes and several other GNCOC member agencies actively fundraise to support an end to youth homelessness. NH is the only state in New England that does not have a youth homeless shelter. The Youth Homelessness Committee is researching strategies implemented in other States, such as "Host Homes" to start as a pilot here. Harbor Homes also joined forces with the Nashua School District four years to co-employ a Homeless Student Liaison who identifies homeless youth in the schools and provide them with assistance.

The GNCOC Data Collection Committee conducts monthly reviews of Coordinated Entry calls from homeless youth, youth who visit GNCOC's Resource who identify as being literally homeless, and annual information from the Department of Education on students who are literally homeless. The GNCOC selected these measures as they represent the places that homeless youth are most likely to be accessed and where good data can be captured to reduce duplication and target additional services as

necessary (e.g. pregnant/parenting youth).

The GNCOC's Coordinated Entry refers Veterans to Harbor Homes' Veterans FIRST programming and/or NH211 which provides services from one point. Harbor Homes has the following programs: SSVF, HVRP, VASH, GPD, emergency, and permanent housing for Veterans. Harbor Homes works in collaboration with the VA, other government agencies, GNCOC and the community to ensure the needs of the homeless veterans are met. The various agencies that work with the Veterans meet and communicate regularly to exchange information, create strategies, and make and track referrals for those on the list. Of note, the GNCOC achieved an effective end to veteran homelessness in 2017. This is the result of collaborative and dynamic outreach efforts with multi-funded outreach streams. The GNCOC and its Vet Subcommittee is focusing on community education and information to the community on how to align in our mission to build and maintain a robust system VFW, American Legion and DAV conventions; with connections provided with handouts for each posts with statewide 211 information.

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

During the past year, GNCOC experienced an almost 2 percent reduction (1.88% or 11 people) in the number of first-time homeless from 584 to 573 persons. This reduction can be attributed to the GNCOC's Coordinated Entry Team which has placed diversion as its top priority when meeting with homeless individuals. Through diversion the Team is able to determine if an individual is truly homeless, has no other place to go and needs to be in a homeless facility. Some are more on the "risk of becoming homeless" due to payments owed on utility bills, rent, etc. In these cases the team works to find resources to address this issue so the individual can remain housed. The CoC continues to educate providers order to identify risk factors for homelessness through a diversion process. These risks include safety, employment/income status, family dynamics, mental and physical health, substance use, and history of housing and homelessness.

Diversion is attempted before entering an emergency shelter and several diversion attempts may occur before the client is fully assessed. All these diversion attempts are documented in HMIS, and clients are not engaged for permanent housing placement until all diversion options have been exhausted. Diversion also helps to determine if there are other locations such as a relative or friend's house where they can stay. When prevention funds are available, they are used to respond to service issues. Harbor Homes Inc. a funded agency, with the GNCOC Board is responsible for overseeing this Assessment Team and its strategy.

Harbor Homes Inc. will begin a 5 year \$400,000 grant from USDHHS (Substance Abuse and Mental Health Services Administration), to assist youth ages 18-24 with permanent housing. Approximately 150 individuals will be assisted. The funding will allow Harbor Homes to implement a comprehensive recovery and treatment program to individuals with a history of substance use disorders, and include permanent housing to further support a healthy transition to self-sufficiency and sustainability.

The GNCOC's adopted discharge protocols, which covers discharge from foster care, health care, mental health and corrections can be found at their website <http://nashua-coc.org/>

Discussion

CDBG funding will be directed to the Nashua Soup Kitchen & Shelter to remediate asbestos in a commercial building that will be developed into new a shelter facility, offering emergency shelter for single adults and families with children, as well as the creation of 10 units of permanent housing for individuals experiencing homelessness.

In response to the opioid drug crisis facing New Hampshire, a new task force on Substance Use Prevention, Treatment and Recovery was formed in January 2016 in Nashua, and began meeting to discuss how various organizations and agencies can work together to combat the opioid crisis. After 14 overdose deaths occurred in Nashua within a 2-month period (the highest number to date at that point in time), the task force proposed the creation of a safe station initiative that would serve those who are seeking treatment and recovery from drugs and substance misuse.

The City of Nashua (notably its Fire Department) has partnered with Harbor Homes, Ambulance Medical Rescue (AMR), St. Joseph's Hospital, Southern NH Health System and Revive Recovery Resource Center to implement a unique and successful strategy for helping individuals in need of substance use disorder treatment. Since late November 2016, 24 hours a day, an individual in need of help can go to any Nashua fire station ("Safe Station") and ask for assistance. The firefighters provide a quick assessment to determine if emergency medical care may be needed. Within 20 minutes, through texts, emails, and phone calls, a Harbor Homes trained recovery support provider responds in person to transport the participant to one of three locations where substance use disorder treatment, behavioral and primary health care, and emergency shelter will be provided.

As most City hospital Emergency Rooms may be overwhelmed with patients, this program assists all by weeding out those individuals seeking assistance that may not need immediate medical attention, but need immediate help. In its first year, over 1,100 individuals received assistance and the incidence of overdoses was reduced by 24%. The City plans to expand the network and services offered to increase the number emergency shelter beds available.

Below is a summary from the 10-year Plan to End Homelessness:

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

NH Housing Finance Authority's 2018 Rental Survey, conducted by the University of New Hampshire Survey Center, polled the owners and managers of more than 23,000 unsubsidized (market rate) rental housing units around the state (15% of the total number of units). The survey found that the statewide median gross rent of \$1,296 (including utilities) for two-bedroom units has increased nearly 19% in the past five years, and that for the fifth year in a row rents have increased.

New Hampshire's vacancy rate stands at 1.96% for two-bedroom units. In comparison, the U.S. Vacancy rate is 7% and in the Northeast it is 5.1%. (A vacancy rate of 4% to 5% is considered a balanced market for supply and demand.) The availability of units in the southern tier counties (Hillsborough, Merrimack, Rockingham and Strafford) as well as in the Upper Valley's Hanover/Lebanon area is especially low.

The highest rents are located in the southern counties near the state's largest cities and close to employers as well as the Boston job market. This is also where most of the state's rental housing properties are located. In order to afford the statewide median cost of a typical two-bedroom apartment with utilities, a renter would have to earn 117% of the statewide median renter income, or over \$47,100 a year.

Furthermore, fair housing and affordable housing are closely intertwined. The City was working toward developing an Assessment of Fair Housing that revealed there are some public policies that affect the limited availability of affordable housing. Examples include single family zoning restrictions, lot and green space restrictions, etc. Other barrier examples include families opting to house multiple households in one unit, due to rising rents and economic downturns. Nashua does not restrict the number of related persons in one dwelling unit, however there can only be up to three unrelated people. The City's most affordable housing, namely rental, is coterminous with the inner city where the housing is dense, the population is predominately low-income and open space is limited. Parking in higher density areas or for homes with large families is a problem as parking space is limited. Nashua generally does not allow overnight parking on city streets, however recently revised its parking ban to allow certain streets (those in the most dense/low-income neighborhoods) to park on the street.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

Many communities in New Hampshire during the height of population growth established incentives for the development of housing for older persons as permitted under state and federal law. Given that the State has an aging population the development of age restricted housing was partially in response to meeting a growing demand. Additionally, senior housing theoretically had lower tax implications to municipalities than housing with children, making it more desirable. While such developments are exempt from familial status and age discrimination complaints, their proliferation came at the detriment of meeting housing demands for families with children. This past year the City amended it's Senior

Housing Ordinance to tighten the definitions and criteria to qualify as senior housing. The legislation better regulates where this housing can be developed and it's suitability within the proposed neighborhood.

Recent studies identified a serious mismatch between the existing housing stock in the state and the needs and desires of our changing population. NH's Accessory Dwelling Unit (ADU) law, which took effect on June 1, 2017 permits a residential living unit that is within or attached to a single-family dwelling and that provides independent living facilities for one or more persons, including provisions for sleeping, eating, cooking, and sanitation on the same parcel of land as the principal dwelling unit it accompanies. ADU's increase the housing supply without further land development, are an affordable housing option for many low-moderate income residents, improves homeowner cash flow and are helpful to the elderly and/or disabled people who may want to live close to family members.

Regarding development, the City has a AAA bond rating and comparatively low building fees, which creates a positive lending environment. The result of which can be seen in a recent uptick in affordable housing development throughout the city. During this plan year we expect to see the completion of 22 Marshall Street, containing 152 affordable housing units (100% of the project)/10 of which are HOME units.

The City has also adopted The Community Revitalization Tax Relief where property owners who intend to substantially rehabilitate a building located in downtown may apply to the City for a period of temporary, finite, tax relief during which the property tax on the structure would not increase as a result of its substantial rehabilitation (between 5 and 13 years). In exchange for the relief, the property owner grants a covenant ensuring there is a public benefit to the rehabilitation. Given that downtown Nashua contains mill building ripe for conversion this incentive may facilitate affordable housing development (as was the case for 30 Front Street/Cotton Mill). The City also offers tax exemptions for many segments of the community reducing the assessed value of the property as follows: blind exemption \$75,000; disabled exemption \$155,000; elderly exemption ranges from \$155,000-\$225,000. In the past year, the city increased the elderly exemption amount and will continue to review credits to determine increases as necessary.

Lastly, the City worked with the Governor's Office for the successful designation of two of our most distressed Census Tracts as Opportunity Zones to spur economic development. Opportunity Fund investors will receive a deferral of taxes owed on unrealized capital. Further after 10 years, the investor will be eligible for an increase in the basis of their original investment, meaning significantly lower taxes at the end of the term.

Discussion:

As noted, the City began developing an Assessment of Fair Housing. Following the suspension of the rule, we will use the data and community input already obtained to assist us in preparing an Assessment of Fair Housing (AI) in the upcoming year. The completion of the AI will help inform the development of our next Consolidated Plan.

AP-85 Other Actions – 91.220(k)

Introduction:

The Action Plan describes, in detail, the activities and actions the City is planning for the upcoming year. Following is additional information on actions not covered elsewhere in the Plan.

Actions planned to address obstacles to meeting underserved needs

The greatest obstacle to meeting underserved needs is the limited availability of funding. Federal and local budget cuts, a competitive housing market and political climate have resulted in the increased need for services, economic opportunities and affordable housing.

While the City relies on CDBG and HOME, these funds alone are not enough to address all needs. The City addresses this obstacle by pursuing other grant opportunities, such as the Lead Paint & Healthy Homes Program; collaborating with neighboring communities to share “lessons learned”; using best practice guidelines, systems, and previously created documents. Partnering to leverage resources toward common goals is a major component in meeting underserved needs. Streamlining services by using technology also helps provide improved services.

Actions planned to foster and maintain affordable housing

The City works to maintain affordable housing through the oversight and management of its existing HOME assisted units, directing HOME funds to new projects, and by providing CDBG grants to providers of affordable housing. Many of the City’s HOME assisted projects are aging and in need of capital repairs. To this end, the City has modified the legal agreements for projects that have achieved the affordability period (in most cases 20+ years), thereby allowing new HOME funds to be applied, creating new affordability periods and long term quality housing.

Addressing substandard rental housing continues to be a high need. As of this writing (mid-March) Code Enforcement Department has taken 686 new cases. If we project that through the end of the fiscal year, the total could easily reach 968, a 19% increase over the 811 last year. The majority of these complaints are housing related and located in the City’s Census Tracts with the highest concentrations of low-income, rental occupied units. These statistics, along with frequent inquiries related to programs for rental rehab, demonstrate the need/demand to create a rental rehab program. This year’s Action Plan includes a pilot program, using some of the repaid housing loan program income toward rental rehab. Although it is a small start, we will reevaluate the program after one year. At which time the next Consolidated Plan will be underway and offer an updated look at need. Further, under the City’s HUD Lead-paint & Healthy Homes grant we are able to assist rental properties address lead hazards and minor rehab using Healthy Homes Initiative funds.

Actions planned to reduce lead-based paint hazards

Since 2007, the City, through the Urban Programs Department, has been successful in securing grant funding from HUD’s Office of Healthy Homes and Lead Hazard Control to address lead paint and other

health hazards in units occupied by low-moderate income households. As of this writing the City has been awarded a total of \$11,700,000 through four separate grants. This year we anticipate addressing hazards in approximately 60 housing units occupied or available to low-income households.

The City also addresses lead hazards through the Housing Improvement Program. Complying with HUD's Lead Safe Housing Rule, certain work will trigger the need to address lead paint. In all other projects, the City requires contractors to use lead safe work practices and EPA's Renovate, Repair and Paint protocols.

The City of Nashua's Division of Public Health and Community Services provides free blood lead screenings, education and home visits with a specialist from the Environmental Health Department. Nurses offer one-on-one education with parents of children with elevated blood lead levels. The City is working toward reaching a "One Touch" approach in dealing with the multiple health hazards in homes. A one touch approach takes advantage of the fact that many different agencies may be visiting a home. Whichever is the first to get their foot in the door should identify the potential hazards, correct the problems, refer occupants to services or educate, thus reducing the number of visits/agencies to one home. Keeping this goal in mind, the City's Code Enforcement Department has been trained to recognize potential lead hazards, especially in homes where young children reside, and make referrals to the Urban Programs Department. The City recently bought cloud-based software that will allow us to re-create the "One-Touch" assessment on our own. The State of NH had previously launched, but subsequently dismantled a state-wide assessment form.

Actions planned to reduce the number of poverty-level families

There are a variety of actions the City undertakes throughout the year in an effort to reduce the number of poverty-level families and increase self-sufficiency. Both CDBG and general fund support public service activities and agencies that are providing services to break the cycle of poverty. These services include job training, counseling, budgeting/life skills, child care and more. CDBG & HOME also directly impacts households, living at or below the poverty level, by reducing the cost of housing, improving energy efficiency, public transportation and health care assistance. CDBG funds in the Action Plan are allocated to a new economic development initiative, Entrepreneurship for All (E for All), toward the development of micro-enterprises. E for All's mission is to accelerate economic and social impact through entrepreneurship. Leveraging the CDBG funds, over a five-year period they plan to directly create 200 businesses (including non-profits), 500 jobs, \$10 million in capital raised. Further, in other similar cities, they have reported direct systems changes. These include:

- Changes in institutional practice - Greater Nashua will gain new cultural competency practices to better meet lending needs of entrepreneurs from low-income neighborhoods
- Changes in entrepreneurial support systems – new pipeline of entrepreneurs from low-income neighborhoods will be created for Greater Nashua and other capital providers (private banks and quasi-public financing institutions)
- Changes in city policy – City of Nashua and its partners will be able to support One Greater Nashua goals to build social inclusion and integration across groups

Additionally, the City's Economic Development Department works diligently to grow the City's economy,

specifically by working to redevelop vacant or underperforming commercial corridors. Developing a variety of businesses in Nashua is critical to providing living-wage jobs for a diverse population with multiple jobs skills and experiences. Economic Development is accomplished by utilizing many different funding sources including, but not limited to, the CDBG Economic Development Fund, tax-increment financing (TIF) and local funds. Urban Programs has been working more closely with EcoDev to explore HUD funded opportunities that may improve economic opportunities for low income individuals.

Actions planned to develop institutional structure

Central responsibility for the administration of the Annual Action Plan is assigned to the Urban Programs Department (UPD). UPD will coordinate activities among the public and private organizations' efforts to realize the prioritized goals of the Annual Action Plan. Extensive public-private partnerships have been established and organized to address the City's housing and community development needs. The UPD will draw from the expertise in the community, the GNCOC and other networks to strengthen existing partnerships and develop new collaborative relationships. It is impossible to list all of the City's partnerships that develop institutional structure, however listed below are several highlights:

The Division of Community Development provides the staff liaison/Vice Chair to the Environment and Energy Committee. Its purpose is to further sustainability and livability in Nashua by promoting environmental stewardship and renewable energy, encouraging energy conservation and energy efficiency, reducing environmental impacts and encouraging green initiatives both within the municipality and beyond to reach businesses and residents. The Committee is encouraged to recommend municipal energy and energy efficiency projects that would result in cost savings for the City. The Committee will advise the Mayor and Board of Aldermen on environmental and energy issues.

The City's Office of Emergency Management takes innovative approaches to address unmet disaster needs that deliver resilience to future disasters and multiple benefits (e.g., economic revitalization, job creation, community amenities). Specific examples include ongoing efforts:

- J Community Assessment for Public Health Emergency Response (CASPER): The CASPER has been used historically within the City of Nashua to help policy makers, healthcare providers, and social service organizations understand the current health concerns of residents and identify gaps in resources or services. Included in the CASPER were a number of questions related to community resilience and preparedness. All the information collected through this anonymous door-to-door survey was analyzed and organized into meaningful measures for organizations throughout the Greater Nashua area to develop better programs and provide effective services for the people they serve.
- J AmeriCorps Ready Corps Program: Nashua OEM sponsored two AmeriCorps members through the Points of Light's Ready Corps Program to assist in developing connections with community organizations to promote disaster preparedness. Points of Light's Resilient Communities is a whole-community effort that engages local change-makers from a diversity of socioeconomic, racial, and professional backgrounds to take individual and collective action that has a clear, measurable impact and develops local leaders and organizations for long-term change. The program has plans to continue with one Ready Corps member for the 2017-2018 service year.
- Congestion Mitigation and Air Quality Improvement (CMAQ): Nashua participates in the CMAQ program to help improve air quality, lower emissions, and improve transportation

infrastructure effectiveness through projects expanding transit services and improvements to traffic management systems. The City actively pursues grant funding under this program.

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

The City has recently taken, or is planning to take the following actions:

- J Community Resilience Strategy: The City of Nashua began working with community stakeholders throughout 2018 to develop a comprehensive resilience initiative. The Resilient Nashua Initiative's main purpose is to identify acute shocks and chronic stressors impacting the City of Nashua, now and in the future, and collaboratively find solutions to address these complex issues. The first task was to update the City's Hazard Mitigation Plan as well as develop a Resilience Strategy Plan to improve overall resilience for the community as a whole. Throughout 2018 and 2019 the City will host a variety of opportunities, such as workshops, for stakeholders and the public to contribute to the Resilient Nashua Initiative. All community members are encouraged to take part. This Initiative has a direct connection to low-moderate income residents, as their resources are scarce to recover or absorb trauma. Overall goals include: Identify acute shocks impacting the City of Nashua Identify chronic stressors impacting the City of Nashua Encourage diverse stakeholder dialogue through an inclusive environment Identify opportunities to improve the City of Nashua's resilience
- J Working to implement actions that permanently increase community resilience (e.g., building code updates, integration of low-cost hazard mitigation into HUD-funded owner rehab and lead paint activities and integrating disaster/hazard mitigation and planning into CDBG public facility activities). The 2017 Greater Nashua Community Health Assessment is the third comprehensive Community Health Assessment conducted by the Division of Public Health and Community Services and their Public Health Advisory Council partners. It is a product of the collaboration of over 33 organizations, programs and City departments serving the Greater Nashua Community. Like the previous CHAs, data from the assessment will be used to prioritize health issues, develop goals and strategies to improve health outcomes, and implement evidence-informed initiatives to make our community a healthier place to live, work, and thrive.
- J In response to the Community Health Assessment, the City creates the Community Health Improvement Plan (CHIP). This works on a three year cycle. The Public Health Advisory Council (PHAC) completed the process to develop the region's third plan, the 2018-2021 CHIP, that details the evidence and strategies that will be implemented to bring positive change in the prioritized areas. Priority areas will include: Behavioral Health (suicide, mental health, and substance misuse), Chronic Disease, Maternal and Child Health, Weight Management/Physical Activity/Nutrition, and Public Health Emergency Preparedness.
- J 2-1-1 is New Hampshire's first statewide, comprehensive, information and referral service. Through a unique coalition of non-profit, government, corporate and volunteer partners, New Hampshire residents need only dial 2-1-1 to be connected, at no cost, with trained Information and Referral Specialists who can provide them with the health and human service information they need to get help, give help or discover options. 2-1-1 NH is an initiative of Granite United Way and relies on donors and partners like Eversource, the State of New Hampshire, Volunteer NH and local United Ways.

Program Specific Requirements

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

Introduction:

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies the balance of program income receipted during PY2018 (FY19) that is available to fund activities in PY19 (FY20). This information was taken from the PR09 report as of submission and may change by end of program year. Repaid loans in the amount of \$64,223.00 were receipted; program income for FY19 was estimated to be \$40,000 (and allocated to FY19 activities. Any excess is moved to the HIP program (\$24,223). These funds will be carried forward to PY19/FY20 for owner rehab projects.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	24,223
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	24,223

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	98.50%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(l)(2)

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

None

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

The City may undertake homebuyer development during the plan year. However, we do not plan to offer a down payment assistance program. The City's full Resale/Recapture Policy is attached to this Action Plan and once approved, will be available on our website.

Eligible applicants must be low-income households (<80% AMI). They need not be a first time home buyer or current resident of Nashua. Nashua will utilize the purchase HUD limits in accordance with 92.254(a)(2)(iii). The City does not plan to solicit applications from buyers directly, rather the developer will be responsible for that function. The developer must ensure a fair and equitable process. The City will require a marketing plan from the developer prior to awarding funds. This will allow the City the opportunity to ensure home owner units are available to a wide range of eligible buyers. The City will publically advertise the amount of funds available at least annually on our website, following approval of the Annual Action Plan. The website also provides information on eligible activities and how to apply for development funds. Developer proposals must outline how the home buyers will be identified. The City will also post buyer eligibility information for each project, including who to contact and how to apply. (The web address is <https://www.nashuanh.gov/316/Housing-Programs-CDBG-HOME>). The City anticipates home ownership development occurring primarily through non-profit entities with existing missions/criteria for the population they intend to serve, as identified in their proposal. There are no specific plans to limit beneficiaries to a particular segment of the low-income population, however in some cases, a developer may propose to give preference to a certain population, such as Veterans, homeless, victims of domestic abuse, disabled households, etc. If a proposal is submitted that limits beneficiaries, the limitation would be made public through the local funding approval process (via the Board of Aldermen), allowing the public an opportunity to comment.

The City will apply a Recapture provision when there is a direct subsidy to the buyer. **Direct HOME subsidy** is the amount of HOME assistance, *including any program income*, that enabled the homebuyer to buy the unit. The direct subsidy includes down payment, closing costs, interest subsidies, or other HOME assistance provided directly to the homebuyer. In addition, direct subsidy includes any assistance that reduced the purchase price from fair market value to an affordable price. If HOME funds are used for the cost of developing a property and the unit is sold below fair market value the difference between the fair market value and the purchase price is considered to be directly attributable to the HOME subsidy.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

When a buyer is not directly assisted, recapture is not allowed as detailed in 24 CFR Part 92.254(a)(5)(i). For example, if the City provides HOME assistance to the developer to subsidize development and the home is sold at fair market value, the buyer is not directly assisted and resale provisions must be applied.

Please see the attached policy for the full details of the City's Resale Provisions.

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

None

Percentage of L/M activities shown above reflects PY19 - 100%; PY18 - 95.55%; PY17 - 100%

Other Program Specific requirements, not listed above include:

a) CDBG origin year grant: As shown in AP-15, CDBG funds reprogrammed from prior year activities are detailed in the attached local legislation, Resolution R-19-126, which includes grant origin year. Reprogrammed activities/balances equal \$67,264.84. Some activities included in prior year plans that did not start will be carried forward this year as follows:

-) Labine Park – restrooms \$40,000; PY16 & PY18 (FY17/FY19)
-) Salem St Tot Lot – General park improvements \$40,000; PY17 (FY18)
-) Rotary Common – Splash pad \$70,000 PY18 (FY19)
-) Housing Rehab loan fund - \$60,153 PY18 (FY19)
-) E for All – prior year funds reprogrammed during PY18 per Resolution R-18-101, project implemented in PY19 \$70,000. Funds derived from balance of RLF fund \$46,846.18, Bridges Kitchen rehab \$13,862.50, and Salvation Army bathroom under budget \$9,291.32

b) Program income expected to be received during the program year: As shown in AP-15, the City anticipates \$30,000 in CDBG program income derived from the repayment of housing rehab loans. Under the HOME program we anticipate \$25,000 from repayment under of a HODAG loan (Clocktower Place).

c) Program income amounts not included in a prior action plan: None

d) Program income previously generated under a lump sum drawdown agreement for which a new agreement will be executed during the program year pursuant to 24 CFR 570.513(b): None

g) Reimbursements other than program income, made to the local account: None



RESOLUTION

AUTHORIZING THE MAYOR TO APPLY FOR AND EXPEND THE COMMUNITY DEVELOPMENT BLOCK GRANT (“CDBG”) AND HOME INVESTMENT PARTNERSHIP PROGRAM FUNDS FOR FISCAL YEAR 2020

CITY OF NASHUA

In the Year Two Thousand Eighteen

RESOLVED by the Board of Aldermen of the City of Nashua

That the Mayor be, and hereby is, authorized to file an application with the U.S. Department of Housing and Urban Development (“HUD”) for the annual Community Development Block Grant (“CDBG”) under the provisions of Title I of the Housing and Community Development Act of 1974, as amended, and the HOME Investment Partnership Program under the provisions of Title II of the Cranston-Gonzales National Affordable Housing Act, and to execute all understandings, assurances and agreements as required therein;

That the following CDBG activities shall be carried out with an annual grant of \$646,750; estimated program income of \$30,000; and reprogrammed funds in the amount of \$114,673.84, as described herein, for a total of \$791,423.84. All activities are more fully described and shall be consistent with the proposals contained in the communications to the Human Affairs Committee dated February 7, 2019;

Reprogrammed Funds:

FY18 Salvation Army	\$3,656.68
FY18 CDBG Administration	\$624.50
FY18 Contingency	\$118.62
FY18 Project Delivery	\$1,080.15
FY18 HIP loan balance (program income)	\$61,784.89
FY18 Contingency	\$47,409.00

Activities to be funded in FY18:

1. Public Services - \$97,012.50

Support of public service programs principally benefiting low-moderate income beneficiaries of Nashua. This pool of funds shall be applied to CDBG eligible activities identified through the Citizens Advisory Commission for Community Grants process. Public Services shall not exceed 15% of the entitlement award plus prior year program income.

RESOLUTION

R-19-126 Amended

2. Entrepreneurship For All (E for All) - \$40,000
Entity will facilitate economic development by providing technical assistance, advice, and business support services to owners of microenterprises and persons developing microenterprises.
3. Nashua Children's Home - \$39,024
Window replacement at youth facility, located at 86 Concord Street.
4. Nashua Police Athletic League (PAL) - \$20,000
Fire safety improvements, including sprinkler system, fire alarm panel, fire doors, egress and other related corrections as outlined in proposal.
5. Nashua Soup Kitchen & Shelter - \$75,000
Asbestos remediation at 35 Spring Street to allow property to be developed as a shelter for single adults and families with children.
6. Opportunity Networks - \$50,000
Accessibility and safety improvements, including ADA compliant doors and ADA bathroom renovations.
7. PLUS Company - \$43,094
Replacement of five roof-top HVAC units at 19 Chestnut Street.
8. Youth Council - \$25,000
Heating System replacement for 2nd and 3rd floors of 112 West Pearl Street
9. CDBG Grant Administration - \$135,350
General administration and planning costs of carrying out the CDBG and other related HUD projects by the Urban Programs Department, including but not limited to regulatory compliance monitoring, IDIS management, preparation of required grant reports, advertising, recording fees, etc. Amount shall not exceed 20% of the entitlement award plus actual program income received during the program year.
10. Project Delivery - \$115,000
Construction management related to physical CDBG projects and Housing Improvement Program, including but not limited to the direct cost of the Urban Programs Department staff to conduct environmental reviews, drafting scope of work, preparation of bid documents, bidding, construction management and Davis Bacon compliance.
11. Housing Improvement Program (HIP) - \$89,000
Financial and technical assistance to eligible low-moderate income, owner-occupants in for essential repairs of 1-4 family residential properties. Financial assistance provided in the form of 0% deferred payment loans and/or grants for certain emergency work, as described in the Program's Guidelines. Minor rehab including code and safety corrections, repairs, accessibility, etc. Repayment of prior HIP loans, in excess of annual estimated program income, shall be added to this loan pool during the program year. Emergency work, costing at least \$1,000 and up to \$5,000, may be offered in the form of a grant rather than a loan to owners at or below 30% AMI. Owners earning above 30% AMI may be offered assistance in the form of a loan.

RESOLUTION

R-19-126 Amended

12. Rental Rehab Program - \$54,894

Pilot program utilizing reprogrammed funds from FY18 HIP loan pool, offering 0% interest, deferred payment loans for essential repairs of residential rental properties containing 1-8 units, occupied by income eligible tenants. Financing and other terms more fully described in the Program's Guidelines. Properties located in the City's lowest income census tracts will receive priority.

13. Contingency – \$8,049.34

Reserve funds that may be applied to any of the activities described herein for unforeseen costs. Funds may be directed to other unforeseen eligible community needs, subject to Board of Aldermen approval. Contingency budget may be adjusted to reflect an increase or decrease in the annual CDBG allocation, as announced by HUD following approval of this Resolution. If CDBG award is significantly less than anticipated and this Contingency line cannot cover the reduction, all activities will be adjusted proportionately.

That all open and active CDBG activities from previous Action Plans be carried forward and entered in the FY20 Action Plan as applicable; and

That the following HOME activities be carried out with an annual grant of \$359,905:

1. HOME Grant Administration - \$35,990.50

Administration of the HOME Program by the Urban Programs Department, including determining eligibility, technical assistance to participants, compliance with program regulations, underwriting, preparation and review of construction specs, environmental review, long-term monitoring and reporting to HUD.

2. Community Housing Development Organization (CHDO) Reserve - \$53,985.75

Mandatory set aside, equal to 15% of the annual grant, for specific activities to be undertaken by a private nonprofit, community-based organization that has staff with the capacity to develop affordable housing for the community it serves. In order to qualify for designation as a CHDO, the organization must meet certain requirements pertaining to their legal status, organizational structure, capacity and experience as it relates to the project they are developing.

3. Affordable Housing Development - \$269,928.75

Acquisition, rehabilitation and /or conversion of residential and/or non-residential buildings to create affordable rental and/or home-owner housing, occupied by HOME-eligible households. Projects may be developed by non-profit, for-profit, public or private entities.