

CITY OF NASHUA, NH



ANNUAL ACTION PLAN

for

Community Development Block Grant and
HOME Investment Partnership Program

For the One-Year Period July 1, 2020 – June 30, 2021

FINAL REPORT

James Donchess, Mayor
City of Nashua
City Hall, 229 Main Street
Nashua, NH 03060

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

Introduction

The City anticipates the following resources being available during the term of the Plan. Nashua is an Entitlement community for CDBG and HOME and we apply as a City directly to HUD for Lead-Paint grant awards. Other funds listed, including COC and Housing Authority are listed for informational purposes. The City is not the direct recipient and does not manage the funds. In other states/jurisdictions, the city may be a direct recipient and this template provides for them to report. However, all the funds listed do help in meeting community needs identified in this Plan.

01/15/2021 MINOR AMENDMENT #1 to reflect corrected Entitlement amounts per HUD guidance: -\$101 CDBG and -\$100 HOME

09/14/21 MINOR AMENDMENT #2 Several projects were removed from the PY20 Action Plan and added to the PY21 Plan. Total value \$65,000

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	664,414	45,000	287,767	997,181	2,542,457	Expected Remainder of Consolidated Plan: Past 5-year annual average for 4 years. Prior year funds: PAL \$20,000; Labine Park \$40,000; NSKS \$75,000; HIP Balance \$102,447; Impact Fund balance \$8,275; Salem St Tot Lot bal \$547; other project balances reprogrammed into activities listed in this action plan \$41,557
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	427,776	0	559,392	987,168	1,402,898	Prior year funding based on PR27 report. Development funds avail=\$450,485; CHDO =\$76,224.72; Admin = \$32,683. Expected amt remainder of Consolidated Plan: 5-year past average for 4 years.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other	private	Housing	75,000	0	0	75,000	300,000	Private funds, in the form of property owner contributions, toward Lead Hazard Control Grant projects. Anticipated new grant for remainder of Plan period
Other	private	Multifamily rental rehab	15,000	0	0	15,000	60,000	Private funds, in the form of property owner contributions required under the rental improvement program.
Other	public - federal	Housing	13,750,000	0	0	13,750,000	59,000,000	HUD Lead Paint & Healthy Homes grant. Current grant end 12/2020, new grant estimated and anticipated.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other	public - federal	Housing TBRA	1,940,000	0	0	1,940,000	7,200,000	HUD funds awarded to the Greater Nashua Continuum of Care to address homeless needs (rental, transitional, supportive housing and services). Est remaining = \$1.8M*4 years
Other	public - state	Housing	100,000	0	0	100,000	400,000	State lead paint loan fund. Used as supplement/gap filler to HUD lead grant projects
Other	public - local	Public Services	522,000	0	0	522,000	2,090,088	Local funds through the Mayor's budget for human service activities. Remaining est = \$522k*4 years + inflation increase

Table 1 - Expected Resources – Priority Table

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

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/discouted 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 receipted 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

The city currently has no plans to develop publically owned land to address needs identified in this Plan. Individual Action Plans will be updated as needed if the opportunity arises.

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

Table 2 – Goals Summary

Goal Descriptions

1	Goal Name	Rental Housing
	Goal Description	Affordable housing development under the HOME program
2	Goal Name	Homeowner Rehab
	Goal Description	Owner-occupied rehab program; 0% deferred loans to low income owners of 1-4 family properties.

3	Goal Name	Rental Rehab
	Goal Description	Annual plan includes fundign to Rental Improvement Program.
5	Goal Name	Improvements to Youth Facilities
	Goal Description	Annual Plan includes Boys & Girls Club (529 ppl)
6	Goal Name	Special Needs Facility Improvements
	Goal Description	Annual Plan includes allocation to PLUS Company (250 ppl) and Opportunity Networks (45 ppl)
11	Goal Name	Public Services - Youth
	Goal Description	Operating support to agencies that provide youth services - includes PAL and Boys & Girls Club
12	Goal Name	Public Services - general
	Goal Description	
13	Goal Name	Public Services - Special Needs Pop
	Goal Description	Operating assistance to Opportunity Networks
18	Goal Name	Public Facility Improvements - Homeless
	Goal Description	Annual Plan includes allocations to Marguerite's Place (10 hh's) and Front Door Agency (23 HH's)
19	Goal Name	Public Services - Homeless/Transitional Hsg
	Goal Description	Operations support to Marguerite's Place and Front Door Agency

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 Plan. Particulars are noted in the individual project narratives.

Total of CDBG projects = \$971,311; funds available in AP-15 totals \$987,167. The difference is uncommitted funds: approx \$5,570 in Contingency for PY20 construction projects; \$20,000 from the project at PAL, cancelled in June 2020 and not yet reallocated; and \$518 balance of Tot Street Lot park improvement project, also not yet programmed.

01/15/2021 MINOR AMENDMENT #1 to reflect corrected Entitlement amounts per HUD headquarters: - \$101 CDBG and -\$100 HOME; admin adjusted

09/14/21 MINOR AMENDMENT #2 - Projects updated: Parks/Trails/Greenspace projects did not occur during program year due. Ash St. Futsal court will be carried out in PY21 - project delayed due to staffing capacity; Sandy Pond and Los Amigos Parks - Quotes were obtained and additional funds are needed to carry out this project. Public Works is overseeing and hopes to carry this out in PY21. All three projects were entered in the PY21 Action Plan. (\$35,000/5670 LMC removed)

Public Facility-Homeless was updated to remove Front Door Agency (\$30,000/23 LMC removed). Entity received other grant funding to carry out the project. The activity was amended to assist a different transitional housing location, also owned by Front Door Agency. The amended project was carried forward and entered in the PY21 Action Plan.

Projects

#	Project Name
2	Public Facility - Youth
3	Public Facility - Homeless
4	Public Facility - Special Needs
5	Project Delivery - Housing Rehab (14H)
6	Admin Costs
7	Housing Rehab - Owner Occupied
8	Housing Rehab - Rental Properties
9	HOME - CHDO Development
10	Affordable Housing Development

#	Project Name
11	Public Facility Improvements - Nashua Soup Kitchen and Shelter
12	Public Services - Youth
13	Public Services - Homeless-Transitional
14	Public Services - Special Needs
15	Public Services - COVID-19 response (CDBG reprogrammed)

Table 3 - 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 Information

1	Project Name	Public Facility - Youth
	Target Area	
	Goals Supported	Improvements to Youth Facilities
	Needs Addressed	Public Facility Improvements
	Funding	CDBG: \$47,236
	Description	Rehab of youth facilities
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approx 529 low-mod youth will benefit from the improvements
	Location Description	Boys & Girls Club of Greater Nashua - address is One Positive Place Nashua, NH 03060
	Planned Activities	Renovation to the pool decking and tile. CDBG award is \$39k; project funding includes an estimated \$8,236 of staff time charged for construction oversight.
2	Project Name	Public Facility - Homeless
	Target Area	
	Goals Supported	Public Facility Improvements - Homeless
	Needs Addressed	Public Facility Improvements
	Funding	CDBG: \$42,671
	Description	Annual Plan includes allocations to Marguerite's Place
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Marguerite's Place 10 @ 30% AMI
	Location Description	85-87 Palm Street (Marguerite's)

	Planned Activities	Replacement of old vinyl windows at transitional housing facility owned by Marguerite's Place; CDBG award \$30k Est. construction management staff costs \$12,671
3	Project Name	Public Facility - Special Needs
	Target Area	
	Goals Supported	Special Needs Facility Improvements
	Needs Addressed	Public Facility Improvements
	Funding	CDBG: \$58,137
	Description	Annual Plan includes allocation to PLUS Company and Opportunity Networks
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	PLUS Company (250 ppl) and Opportunity Networks (45 ppl) - total 295 @ or below 30% AMI
	Location Description	19 Chestnut Street - PLUS company 116 Perimeter Road, Unit A
	Planned Activities	PLUS Company: Entry renovations to improve accessibility access; CDBG award \$15k Opportunity Networks: Bathroom renovations to include a motorized lift and other accessibility improvements; CDBG Award \$33k Staff time est. charged for construction management \$10,137
4	Project Name	Project Delivery - Housing Rehab (14H)

	Target Area	
	Goals Supported	Homeowner Rehab Rental Rehab
	Needs Addressed	Rehab of Existing Units
	Funding	CDBG: \$91,066
	Description	Cost of staff to develop scope of work, provide construction management for housing rehab projects.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	This activity is tied to housing rehab projects. Beneficiaries are reported within those activities.
	Location Description	City-wide
	Planned Activities	City staff provides construction management for physical projects; prepares scope of work, oversees bidding, on-site management of contractors, invoicing, Davis Bacon if applicable, etc. The total was calculated by taking the total cost allocated to rehab and public services, then assigning a proportionate amount for budgeting purposes. Actual hours will be tracked and assigned accordingly. This activity covers approx 67% of the Project Administrator who oversees the construction management of rehab and public facility projects. It also covers a portion of other staff who charge time directly to housing rehab (as tracked on weekly time reports).
5	Project Name	Admin Costs

	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$141,882 HOME: \$75,460
	Description	Administrative costs related to CDBG and HOME
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Admin benefits all activities carried out under the Plan
	Location Description	
	Planned Activities	Administrative costs for staff to operate the CDBG and HOME programs. Includes Plan development, reports, monitoring, tracking, budgeting, Subrecipient management, meetings, etc. CDBG admin is limited to 20% of annual allocation, plus program income received during the year. If estimated PI is not fully met, admin will be reduced. Note: HOME Admin includes \$32,683 carried forward from prior years. No more than 10% will be committed/expended for this program year.
6	Project Name	Housing Rehab - Owner Occupied
	Target Area	
	Goals Supported	Homeowner Rehab
	Needs Addressed	Rehab of Existing Units
	Funding	CDBG: \$152,447

	Description	Loan program to assist low-moderate income property owners with essential repairs. \$102,447 carried forward from prior year balance; \$50,000 current year.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 10 housing units: 6 @ 80%, 2 @ 50% and 2 @ 30% AMI
	Location Description	City-wide
	Planned Activities	<p>Financial and technical assistance to eligible, low-moderate income, owner-occupants in the form of deferred payment (0% interest) loans for essential repairs of 1-4 family residential properties. Minor rehab including code and safety corrections, repairs, accessibility, etc. Minor emergency repairs of \$1,000-\$5,000 may be awarded as a grant for owners earning less than 30% AMI.</p> <p>Repayment of prior rehab loans, in excess of annual estimated program income, shall be added to this loan pool during the program year (repaid loans shall be pro-rated 50/50 between owner and rental program).</p>
7	Project Name	Housing Rehab - Rental Properties
	Target Area	
	Goals Supported	Rental Rehab
	Needs Addressed	Rehab of Existing Units
	Funding	CDBG: \$150,000

	Description	Loan program to assist landlords who rent to low-income tenants with essential repairs.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approx. 10 total units with tenants at 50% and 305 AMI
	Location Description	City-wide
	Planned Activities	The program offers deferred payment (0% interest) loans for essential repairs of residential rental properties containing 1-8 units. Properties must be occupied by income eligible tenants; rents charged must not exceed HUD published fair market rents; and owners must provide a 10% match based on total project cost. Each owner may receive only one loan per year capped at \$20,000 for one unit plus \$5,000 for each additional unit. Properties located in the City's lowest income census tracts will receive priority (i.e. French Hill, Crown Hill and Tree Streets neighborhoods)
8	Project Name	HOME - CHDO Development
	Target Area	
	Goals Supported	Rental Housing
	Needs Addressed	Production of Affordable Rental Housing
	Funding	HOME: \$140,391

	Description	Housing development by a Certified Housing Development Organization. \$76,224.72 prior year funds carried forward; \$64,166.40 current year (edited 1/26/21 to reflect EN reduction).
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Housing developed will benefit 50% and 30% AMI - approximately 5 units.
	Location Description	TBD
	Planned Activities	HOME Applications taken on a rolling basis. Neighborworks of Greater Nashua is in the planning stages to rehab rental properties using CHDO funds.
9	Project Name	Affordable Housing Development
	Target Area	
	Goals Supported	Rental Housing
	Needs Addressed	Production of Affordable Rental Housing
	Funding	HOME: \$771,317
	Description	General housing development (non-CHDO) under the HOME program. \$450,485 prior year funds; \$320,832 current year funds (edited 1/26/21 to reflect EN reduction).
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Approx 25 units developed, targeted toward 50% and 30% AMI.
	Location Description	City-wide

	Planned Activities	HOME applications accepted on a rolling basis. This project covers affordable housing development by non-CHDO entities (private or for-profit). New construction, redevelopment, or substantial rehab.
10	Project Name	Public Facility Improvements - Nashua Soup Kitchen and Shelter
	Target Area	
	Goals Supported	Public Facility Improvements - Homeless
	Needs Addressed	Homelessness
	Funding	CDBG: \$75,000
	Description	Redevelopment of former school building to shelter and transitional housing facility. Carried forward from PY19 (local FY20)
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	306 homeless individuals @ or below 30% AMI.
Location Description	35 Spring Street	
	Planned Activities	Redevelopment of a former school building; new facility will contain emergency shelter, programming space, day center, and transitional housing. Project will result in an increase of shelter beds for women (from 6 to 12), increase family shelter units (from 6 to 12) and create 11 new units of affordable housing.
11	Project Name	Public Services - Youth

	Target Area	
	Goals Supported	Public Services - Youth
	Needs Addressed	Public Services
	Funding	CDBG: \$52,677
	Description	Operation support to agencies that provide youth services
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	B&G Club 875 PAL 361 Youth 30-50% AMI
	Location Description	One Positive Place - B&G Club 52 Ash Street - PAL
	Planned Activities	Boys & Girls Club Hispanic outreach program; PAL after school and summer youth programs
12	Project Name	Public Services - Homeless-Transitional
	Target Area	
	Goals Supported	Public Services - Homeless/Transitional Hsg
	Needs Addressed	Public Services
	Funding	CDBG: \$41,000
	Description	Operating support to two transitional housing facilities
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	FDA 23 low-income FHOH Marguerite's Place 10 low-income female HOH
	Location Description	
	Planned Activities	Opearting support of the FDA and Marguerite's Place Transitional Housing Program
13	Project Name	Public Services - Special Needs
	Target Area	

	Goals Supported	Public Services - Special Needs Pop
	Needs Addressed	Public Services
	Funding	CDBG: \$6,000
	Description	Operating support for Opportunity Networks
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approx 45 very low income, disable individuals
	Location Description	Perimiter Road, Nashua NH
	Planned Activities	Support of their health and wellness program
14	Project Name	Public Services - COVID-19 response (CDBG reprogrammed)
	Target Area	
	Goals Supported	Public Services - general
	Needs Addressed	Public Services
	Funding	CDBG: \$8,275
	Description	Public services authorized under the CARES Act of 2020 to prevent, prepare for and respond to Coronavirus. EN funds reprogrammed in PY2019 - this project is balance uncommitted at year end, carried forward.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Approx 15 low-income individuals; specific activites TBD
	Location Description	TBD

	Planned Activities	Balance of COVID-19 Impact Fund carried forward, derived from reprogrammed EN Funding, as authorized by the CARES Act. Original program allocated all funds, however some entities negotiated their award down to reflect eligible costs.
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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. As previously discussed, Census Tracts 104-108 have the highest need and although not formal, by default most of the activities are targeted to that area.

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.

Geographic Distribution

Target Area	Percentage of Funds

Table 4 - Geographic Distribution

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).

Discussion

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	12
Special-Needs	0
Total	12

Table 5 - 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	12
Rehab of Existing Units	0
Acquisition of Existing Units	0
Total	12

Table 6 - 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. Estimate above reflects 10 rental units coming online through 22 Marshall Street; and 2 homeowner units through Habitat for Humanity at Paxton Terrace.

Although the NHRA Bronstein redevelopment may seek HOME funds; the units produced would likely be claimed in next year's Action Plan.

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. HOME funds may be allocated to the Bronstein Redevelopment. Further the City is assisting to help this project through the permitting process including land use considerations.

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.

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

The Nashua Housing and Redevelopment Authority (NHRA) is planning a major redevelopment that will have a significant (positive) impact on the number of affordable housing units, will greatly improve the layout of the area and living conditions of its current residents. The Bronstein Apartments (the "Property") is a 48-unit public housing development located on a 4.2-acre site at 41 Central Street, Nashua, NH and is owned and operated by the NHRA. The Property was built in 1971 and is in poor physical condition. NHRA has partnered with Boston Capital to redevelop Bronstein Apartments utilizing competitive 9% and 4% low-income housing tax credits, bond financing, and the HUD Section 18 Demolition/Disposition Program. The development team is proposing to replace the obsolete public housing with approximately 204 newly constructed units of mixed-income rental housing. Seventy (70) units will be affordable to extremely-low and low-income individuals and families.

The demolition and disposition of public housing is authorized under Section 18 of the Housing Act of 1937, as amended. NHRA will submit a Section 18 Demo/Dispo application to HUD in 2020. The application will meet all of the administrative steps and requirements of 24 CFR Part 970 and HUD Notice PIH 2018-04 including justification that the Property is obsolete as to physical condition, location, or other factors, making it unsuitable for housing purposes, and no reasonable program of modifications is cost-effective to return the public housing project or portion of the project to its useful life.

Once the Section 18 application is approved by HUD, the Declaration of Trust will be released from the Property and it will no longer operate under the public housing program, but under HUD's Project-Based Voucher Program. The Property will continue to operate with rental subsidy under Section 8 of the Housing Act of 1937.

The timeline for the redevelopment of Bronstein Apartments will be approximately 24-months.

Other actions during the next year to address public housing needs and Section 8 Housing Choice Voucher Program include:

- Apply for additional Section 8 Housing Choice Vouchers, should they become available.
- Utilize Project Based Vouchers to provide additional low income housing choices to the community.
- 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.
- 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 2019
- Plan for alternative affordable housing opportunities under HUDs Rental Assistance Demonstration program, or any other programs available to the NHRA.
- Ongoing oversight and incorporation of bi-annual development and unit inspections to ensure properties meet or exceed HUD standards.
- 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.
- 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:

- 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.
- Meetings with residents to encourage and assist in starting Crime Watch groups at developments showing a need or desire to have one.
- NHRA representation at all Resident Association meetings with management acting as a liaison between residents and NHRA.
- 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.
- Educational sessions provided to residents on site on important health and safety topics (bed bug awareness, fire prevention, etc.)
- 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.
- Management will collaborate with local community agencies to provide services and programs for NHRA residents.
- Monthly review of all criminal activity reports supplied by the local police department to coordinate efforts to resolve and/or prevent further problems.
- Management develops and conducts efforts to involve families in community activities such as development beautification events.
- 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

Not applicable

Discussion

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

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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. has begun 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 was allocated last Plan year to the Nashua Soup Kitchen & Shelter to assist in redeveloping a former school building 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. This project will begin this year.

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.

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

Introduction:

NH Housing Finance Authority's 2019 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 the median two bedroom rent in Nashua increased from \$1,310 per a month in 2015 to \$1,506 per month in 2019. A 19% increase in the last four years and 28% increase since 2009.

Nashua's vacancy rate in 2019 is 0.3% for a two bedroom in Nashua, whereas 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. The average renter in the Nashua region makes \$15.63 per hour, or about \$32,000 per year. This would allow for a maximum of \$800 per month for housing expenses. This is half of the income needed to afford a rental unit at the 2019 median rent of \$1,506 per unit.

Furthermore, fair housing and affordable housing are closely intertwined. The most recent Analysis of Impediments to Fair Housing (conducted as an Assessment of Fair Housing) 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, limitations on parking, 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

During the height of population growth many communities in NH established incentives for the development of housing for older persons. Given that the State has an aging population the development of age restricted housing was partially in response to meeting a growing demand. 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 its 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 its 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 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.

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.

The Housing Appeals Board was signed into law in the summer of 2019 and will become effective January 1, 2021 providing an expedited route for appeals to land use board decisions. This law requires decisions be made in 90 days, instead of the current system which takes more than a year and many times several years for a decision.

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:

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. Code Enforcement had a total of 618 Housing Complaints this past fiscal year (compared to over 900 housing complainants the year before). The last 3 months were very quiet, with very little tenant complaints due to the Covid-19 and the fact tenants could not be evicted per Governor’s order. (State Order now lifted). 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 will be re-applying for a new grant (the current grant is nearly expended and ends December 15, 2020). Under the new award we anticipate approximately \$4M and to address approximately 250-270 units. Nashua has a very aggressive and successful lead paint program. We are optimistic we will receive continued funding.

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'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 also recently entered into a data sharing agreement with the state to obtain information directly regarding lead-poisoned children. This will help streamline and expedite our response.

Actions planned to reduce the number of poverty-level families

Actions planned to develop institutional structure

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:

- **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 hosted a variety of opportunities, such as workshops, for stakeholders and the public to contribute to the Resilient Nashua Initiative. All community members were 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. The final report identified goals: 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.
- **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).
- **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.
- **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.

Discussion:

None additional

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 PY2019 (FY20) that is available to fund activities in this Plan. This information was taken from the PR09 report as of the end of program year. Repaid loans in the amount of \$97,450.00 were receipted; program income for FY20 was estimated to be \$30,00; PI above and beyond the estimate is moved to the HIP program (\$67,450). These funds will be carried forward into this Plan year to fund the rehab program.

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	67,450
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:	67,450

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.	97.70%

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 does not plan to carry out new home buyer activities during the Plan year. Although, one HOME project carried over from PY19 may be completed. This project, 10 Paxton Terrace, was covered by the existing/approved Resale/Recapture Policy (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. Developer proposals must outline how the home buyers will be identified. The City will 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 publicly advertise the amount of funds available at least annually on our website.

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

Housing Trust Fund (HTF)
Reference 24 CFR 91.220(I)(5)

1. Distribution of Funds

- a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2).

- b. Describe the jurisdiction's application requirements for eligible recipients to apply for HTF funds.

- c. Describe the selection criteria that the jurisdiction will use to select applications submitted by eligible recipients.

d. Describe the jurisdiction's required priority for funding based on geographic distribution, which is a description of the geographic areas of the State (including areas of low-income and minority concentration) in which it will direct assistance during the ensuing program year.

e. Describe the jurisdiction's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner.

f. Describe the jurisdiction's required priority for funding based on the extent to which rents for units in the rental project are affordable to extremely low-income families.

g. Describe the jurisdiction's required priority for funding based on the financial feasibility of the project beyond the required 30-year period.

h. Describe the jurisdiction's required priority for funding based on the merits of the application in meeting the priority housing needs of the jurisdiction (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations).

i. Describe the jurisdiction's required priority for funding based on the location of existing affordable housing.

j. Describe the jurisdiction's required priority for funding based on the extent to which the application makes use of non-federal funding sources.

2. Does the jurisdiction's application require the applicant to include a description of the eligible activities to be conducted with HTF funds?

3. Does the jurisdiction's application require that each eligible recipient certify that housing units assisted

with HTF funds will comply with HTF requirements?

4. Performance Goals and Benchmarks. The jurisdiction has met the requirement to provide for performance goals, consistent with the jurisdiction's goals established under 24 CFR 91.215(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

5. Rehabilitation Standards. The jurisdiction must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The jurisdiction's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The jurisdiction must attach its rehabilitation standards below. If the jurisdiction will not use HTF funds for the rehabilitation of housing, enter "N/A".

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; Capital Needs Assessments (if applicable); and broadband infrastructure (if applicable).

6. Resale or Recapture Guidelines. Below, the jurisdiction must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the jurisdiction will not use HTF funds to assist first-time homebuyers, enter "N/A".

7. HTF Affordable Homeownership Limits. If the jurisdiction intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the jurisdiction will not use HTF funds to assist first-time homebuyers, enter "N/A".

8. Limited Beneficiaries or Preferences. Describe how the jurisdiction will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the jurisdiction will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income

population, enter "N/A."

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the jurisdiction must not limit or give preferences to students. The jurisdiction may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303 only if such limitation or preference is described in the action plan.

9. Refinancing of Existing Debt. Enter or attach the jurisdiction's refinancing guidelines below. The guidelines describe the conditions under which the jurisdiction will refinance existing rental housing project debt. The jurisdiction's refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the jurisdiction will not refinance existing debt, enter "N/A."

<TYPE=[section 9 end]>

Discussion:

Other Program Specific requirements, not listed above include:

a) CDBG origin year grant: Reprogrammed activities/balances equal \$41,527.69. [\$41,527 is reprogrammed from FY20 Housing Rehab; \$0.69 from the remaining balances of FY19 CDBG Administration, FY19 Construction Management and FY17 Vietnam Veterans Basketball Court] See local Resolution, this amount is spread among activities planned in first year Action Plan. Breakdown of Prior Year funds:

- Nashua PAL – PY19/FY20 \$20,000 – project cancelled by recipient in July; funds available to reprogram; not allocated
- Nashua Soup Kitchen & Shelter – new facility \$75,000
- Labine Park – restrooms \$40,000; PY16 & PY18 (FY17/FY19)
- Housing Rehab loan fund - \$102,447 PY19 (FY20)
- COVID-19 Impact Fund - balance not yet committed from EN funds \$8,275
- Salem St Tot Lot - available, but not yet reprogrammed \$518

b) Program income expected to be received during the program year: As shown in AP-15, the City anticipates \$45,000 in CDBG program income derived from the repayment of housing rehab loans.

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

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

f) Overall benefit measurement: PY18 95.55%; PY19 100%; PY20 100%