

Executive Summary

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

1. Introduction

The Mayor has directed the Brockton Redevelopment Authority to work closely and collaboratively with public and private housing agencies, other municipal instrumentalities as directed, the Commonwealth's Department of Housing and Community Development and with several non-profit organizations working in the areas of affordable housing, homelessness, social services, and anti-poverty programs as in years past. The Brockton Redevelopment Authority will maintain solid working ties and relationships with the extended network of housing and social service providers operating in Brockton and within the region, while working to build new relationships for the City. While the City faces many new challenges and following outcomes in early 2020, the core needs of the community remain the same and amplified. The BRA will remain active and engaged members and participants of the Mayor's Economic Advisors, which acts as a focal point for municipal entities, non-profit organizations and private industry interests pursuing a common economic development agenda. The management of these federal grants will be done so with participation from the community members, business and organization directors, surveyed needs of the community, innovative ideas to progress the City forward while curing current needs, and anything else needed to ensure best use of dollars for the community and future.

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.

The objectives and outcomes for this Annual Action Plan include the City addressing emergency critical basic needs; stabilization of foreclosed ownership properties and neighborhoods experiencing significant numbers of foreclosures; deteriorating rental housing stock and the on going need for more low income housing; accessibility modifications to public facilities to enable people with mobility impairments to enjoy public assets and services; improving the vitality of the City's downtown and increasing the appeal of local businesses opportunities; supporting and providing a broad range of public service needs for lower income residents; and supporting other special needs, including housing and supportive services, of Brockton residents.

In assigning priority to projects and need categories the City considers a variety of factors including community input, the community's emerging and critical needs, like the devastating foreclosure trend,

significant public facility capital needs, and the service needs of residents; the number of low income people served; and the number and relative percentage of people in need.

The City of Brockton intends to support efforts to reduce crime; enhance the quality of community life through the provision of better public facilities, neighborhood stabilization efforts, and infrastructure improvements aimed at supporting economic development; and reduce poverty and improve the quality of life for people living at or below the poverty level by expanding economic opportunities and supporting vital social/public service providers and facilities that help create and/or retain jobs. The City will also act to stabilize, improve and increase access to owner occupied housing for low and moderate income residents, including addressing the community's significant needs relating to the foreclosure crisis and stabilize, improve and increase the supply of affordable rental units for low and moderate income community members as well as residents with special housing and service needs.

3. Evaluation of past performance

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

For many years now, the Brockton Redevelopment Authority has utilized this federal funding in very similar ways each year. The dollars are always spent to their max, or being allocated and preparing for specific larger projects, the programs and projects that run year over year operate smoothly with great satisfaction from the community. With this in mind, a lot of the plans for this coming fiscal year will remain the same. However, there is always room for growth, improvement and innovation and with that we will be looking to try new things and work on new projects to ensure that the grants are being spent to make the largest impact possible with every dollar.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The Citizen Participation Process for this Annual Action Plan includes the following steps:

- Publication of the proposed document will be available for thirty (30) days
- It will be posted on the City of Brockton's website and the Brockton Redevelopment Authority's website as well as hard copies available at the Office of the Brockton Redevelopment Authority, the Brockton Housing Authority, all public libraries, the Office of the Mayor at City Hall and the Office of the City Clerk. Additionally, copies will be made available free of charge for review and/or distribution to interested residents and the general public at the office of the Brockton Redevelopment Authority. If required, translation may be made available to explain segments of the Plans to non-English speaking people.
- A public hearing will be held about half way through the thirty (30) day period

- During the thirty (30) day publication period, we will be looking for and accepting comments on the proposed plan
- At the close of the thirty (30) day period, all comments will be added to the document and any adjustments needed to the proposed plan will be made

However, with the Cares Act waivers, in order to get this funding out in a more timely manner, we will be shortening the typical thirty (30) day comment period to ten (10) days, with a virtual hearing near the beginning of the ten (10) days to review the proposal with the community and allow thought time and review of the recorded hearing.

*It should be noted that the waivers only require a five (5) day comment period and no public hearing.

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.

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

7. Summary

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		Brockton Redevelopment Authority
HOPWA Administrator		Brockton does not receive HOPWA funds
HOME Administrator		Brockton Redevelopment Authority
HOPWA-C Administrator		Brockton does not receive ESG funds

Table 1 – Responsible Agencies

Narrative (optional)

The City of Brockton has designated the Brockton Redevelopment Authority (BRA) as the lead agency with respect to the Community Development Block Grant (CDBG) program and the Home Investment Partnerships Program (HOME). It is the responsibility of the BRA, under the direction of the Mayor to prepare and submit the City of Brockton's HUD reporting, manage the tracking and spending of the funds, and all other needs and responsibilities that come with having the funds.

Consolidated Plan Public Contact Information

Brockton Redevelopment Authority

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

1. Introduction

The City of Brockton acting through the Brockton Redevelopment Authority has continuously sought input as to the most pressing needs facing the City of Brockton and in particular, its low and moderate income and minority populations. A number of methods were employed to consult with Brockton residents, non-profit organizations, and social service providers including inter-agency meetings, public hearings and forums. The City has relied heavily on these consultations in the development of the Consolidated Five Year Plan. The City will continue to encourage and maintain open lines of communication with all citizens, organizations and agencies throughout the life of the Consolidated Plan and in the preparation and implementation of Annual Action Plans. While also using the applications for funding that comes in to see the need requests.

A notice regarding the public hearing held on the plan were published ten (10) days prior to the hearing. A link to the draft plan was placed on the BRA website at www.brocktonredevelopmentauthority.com. In addition, the draft plan was available for comment at the office of the Mayor, the Brockton Redevelopment Authority, Brockton Housing Authority, Brockton Main Public Library and the two branch libraries.

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 Brockton and the Brockton Redevelopment Authority participates in many regular group meetings to bridge between all housing providers and agencies supporting the City. Such as the Brockton Housing Partnership, South Shore Continuum of Care, Mayor's Neighborhood Stabilization Group, and TDI District Group to name a few. On top of that, part of the application process for funding through CDBG and HOME requires that the applying agency disclose all working partners and explain to us their knowledge of those providing the same or similar services and how they interact or support one another in their efforts. These activities are geared to enhance coordination among public/private and assisted housing providers and governmental health, mental health, and other services agencies. As well, most all the agencies funding through public service funding, provide case management to the clients to ensure they are receiving the full wrap-around support services needed to thrive.

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 Brockton Redevelopment Authority holds a board position on the Continuum of Care for the South Shore region. Collaborations with the Brockton/Plymouth Continuum of Care and Father Bills &

MainSpring through the planning process has taken into consideration the assessments of homeless persons and other concerned parties with respect to the facilities, service, and program needs of homeless individuals and homeless families with children. Emergency shelter for individuals will be provided by Father Bills & MainSpring, located on North Main Street, called "MainSpring House". Emergency shelter for more than 50 families will be provided by the Old Colony YMCA David Jon Louison Center, located on Newbury Street. The David Jon Lousion Center utilizes an extensive community collaborative partnership that collectively meet families' needs. An example of collaboration is the partnership with the Brockton Housing Partnership (consortium of financial lenders and community partners) who provide financial literacy, credit counseling, and individual income and expense counseling to families at the shelter. Other agencies that they collaborate with include but not limited to: South Shore Housing, Northeast Behavioral Health Services, Catholic Charities, South Bay Early Intervention, School on Wheels, St. Patrick's Church etc.

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 of Brockton does not receive ESG funding directly. We do work closely with the Continuum of Care for the region to ensure all public services that are impacted with CDBG and HOME funds are utilizing the proper HMIS policies and procedures.

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

1	Agency/Group/Organization	Father Bills and MainSpring
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy HOPWA 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?	The BRA consults with Father Bill's and MainSpring (FBMS) on a monthly basis to provide needs assessment on employment training for economic opportunity and community revitalization for public service needs in the city. The WorkExpress program by FBMS anticipated to enroll 50 participants, where 90% of graduates will gain housing and 70% will gain employment. WorkExpress also provides critical landscaping, cleanup and graffiti removal services to improve Brockton neighborhoods.

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

Agency types that provide services to persons with HIV/Aids or child welfare agency, specifically and exclusively, were not consulted because there are no known/active agencies that participated in the Plan process. But it is important to note that many of the organizations and agencies consulted with do provide services and interactions with people of those communities and we do discuss and try to cover their needs.

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	Father Bills & MainSpring	The plan includes a Housing First approach by creating permanent supportive housing for chronically homeless persons. The plan also includes energizing local businesses, the Brockton Housing Authority and housing developers to create 100 affordable housing units for low income households and last, but not least, to prevent foreclosures and create more affordable housing for low income families in order to prevent their homelessness.
Urban Revitalization Plan	City of Brockton Planning Dept/ Brockton Redevelopment Authority	The plan covers a wide range of topics including housing, transportation, economic development, land use and zoning, open space, natural resources, and municipal services. Comprehensive planning is a process that determines community goals and aspirations in terms of community development. The outcome of this process is the Comprehensive Plan which dictates public policy in terms of transportation, utilities, land use, recreation, and housing. Comprehensive plans typically encompass large geographical areas, a broad range of topics, and cover a long-term time horizon.
Brockton Housing Strategy Plan	City of Brockton Planning Dept	The housing strategy plan has been prepared in accordance with the Massachusetts Department of Housing and Community Development guidelines and provides a framework and strategy to guide its housing policies and plans to increase the production of affordable housing in Brockton over the next decade (2018-2028).

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

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**

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	Internet Outreach	Minorities Non-targeted/broad community Residents of Public and Assisted Housing				

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The Brockton Redevelopment Authority will maintain solid working relationships with the extended network of housing and social service providers operating in Brockton and within the region. The City of Brockton expects funding for CDBG at \$1,429,997.00 and HOME at \$530,233.00 during time of drafting the FY2020 Annual Action Plan.

As of March 2020, the City of Brockton received \$841,179.00 in CDBG Care Act entitlement funds to assist with COVID-19 response and recovery which is included in this plan as CDBG Prior Year Resources for what has yet to be spent. At this time, the City of Brockton plans to use the funds in three general ways; small business assistance, rent and mortgage payment assistance, and nonprofit direct support for the community needs created or increased during this time. In addition to the new funds coming in, the HOME Program has been issued several waivers to increase funding opportunities with the resources currently at hand. As of now, the City of Brockton hopes to utilize these waivers to newly support the

decreased ability of many to pay rent.

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	1,429,997	0	2,603,174	4,033,171	3,000,000	The Brockton Redevelopment Authority, acting through the City of Brockton, will continue to monitor and work with the Public Service Agencies and provide oversight to all CDBG activities described in this Annual 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	530,233	450,000	499,785	1,480,018	1,100,000	The Brockton Redevelopment Authority, acting through the City of Brockton, will continue to provide oversight to all HOME funded activities described in the Annual Plan.

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

Wherever possible and to the greatest extent feasible, Brockton will utilize CDBG and HOME funds so as to leverage additional state, local and private investments in support of affordable housing, public services and economic development initiatives. Currently, CDBG has been used to match park grants, along with other local developments through the Section 108 Loan, each public service has additional funding sources, and now the LEAD Program is matching homeowner rehabilitation projects. DHCD has given the BRA a grant opportunity based on the current CDBG Homeowner Rehabilitation Program model to help alleviate that waiting list.

In recent years the HOME funds have leveraged NSP funds from the Massachusetts Department of Housing and Community Development and private financing from area banks to acquire and rehabilitate vacant, foreclosed, bank owned two and three family homes for the purpose of neighborhood revitalization. Renovated properties have proven to be the catalyst in stabilizing neighborhoods and attracting private investment. Recent projects have also utilized State Chapter 40R Smart Growth Zoning and Housing Production funds. Developers are also using local HOME funds to leverage both state and historic tax credits along with DHCD State Affordable Housing Trust Funds, state HOME funds and Brownfield funds. Continued bridge building with stakeholders in the neighborhoods is important to ensure long term vitality. The Brockton Housing Authority's Massachusetts Rental Voucher Program will fulfill the City's HOME Match Program.

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

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	Promote Economic Development	2018	2022	Non-Housing Community Development		Economic Development		
2	Promote Services that Promotes Self Sufficiency	2018	2022	Non-Housing Community Development	Downtown - Main Street City Wide Low and Moderate Census Tracts	Homeless/HIV/Aids Public Facilities Public Services		
3	Homeless Prevention	2018	2022	Homeless	Downtown - Main Street City Wide	Homeless/HIV/Aids Public Facilities Public Services		
4	Stabilize and Improve At-Risk Neighborhoods	2018	2022	Non-Housing Community Development	City Wide	Owner Occupied Housing Rental Housing		
5	Revitalize Target Neighborhoods	2018	2022	Affordable Housing	City Wide	Infrastructure Owner Occupied Housing Rental Housing		

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Homeless and At-Risk of Homelessness Services	2018	2022	Homeless	Downtown - Main Street City Wide	Homeless/HIV/Aids Public Facilities Public Services		
7	Increase Access for Homeownership	2018	2022	Affordable Housing	City Wide	Owner Occupied Housing		
8	Preserve Existing Housing Stock	2018	2022	Affordable Housing	City Wide	Owner Occupied Housing		
9	Increase Supply of Affordable Housing	2018	2022	Affordable Housing	Downtown Corridor/Business District City Wide Low and Moderate Census Tracts	Economic Development Infrastructure Owner Occupied Housing Rental Housing		
10	Special Needs Housing	2018	2022	Non-Homeless Special Needs	City Wide Low and Moderate Census Tracts	Homeless/HIV/Aids Owner Occupied Housing Public Services Rental Housing		

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Promote Economic Development
	Goal Description	Enhance the income of low and moderate income residents and provide jobs for the unemployed. Strategies: 1) develop neighborhood businesses 2) redevelopment of underutilized buildings especially downtown 3) support business and encourage efforts to retain and create jobs 4) improve parking and traffic patterns in core business areas 5) attract people to the downtown core.
2	Goal Name	Promote Services that Promotes Self Sufficiency
	Goal Description	Help to maintain good health and preserve independence. Strategies include: 1) enable success in school through a supportive learning environment 2) enable independence through programs provided by social service agencies.
3	Goal Name	Homeless Prevention
	Goal Description	Maximize intervention which addresses activities and events to prevent neighborhood destabilization by stabilizing foreclosed properties and low income households at risk of foreclosure.
4	Goal Name	Stabilize and Improve At-Risk Neighborhoods
	Goal Description	Preserve the quality of life in existing neighborhoods while accommodating smart growth, supporting a well conceived balance between housing development, transportation, open space and recreation facilities, and commercial development.
5	Goal Name	Revitalize Target Neighborhoods
	Goal Description	Under the Rescue of Foreclosed Homes activity, the City of Brockton plans to acquire, rehabilitate and demolish properties in low and moderate income areas of the City. The City's efforts are to prevent neighborhoods from continued deterioration. The Brockton Redevelopment Authority, working with a variety of agencies throughout the City will work to rescue some of these properties and return them to productive use and occupancy. CDBG funds will be used to purchase and rehabilitate foreclosed single family homes which will be sold to low and moderate income families under existing First Time Homebuyer Programs. In the event a property is unable to be rehabilitated, the City will demolish the property to eliminate the concern for the health and safety of the residents that reside in those neighborhoods.

6	Goal Name	Homeless and At-Risk of Homelessness Services
	Goal Description	Intervene in situations which can lead to homelessness such as foreclosures and develop permanent housing in place of temporary shelters. Strategies: 1) info and referral services to connect people at risk w/appropriate resources 2) provide training and services to enable the homeless to become self sufficient.
7	Goal Name	Increase Access for Homeownership
	Goal Description	Provide down payment assistance and closing cost assistance for 1st time home buyers purchase and rehab program assistance and housing counseling courses. Fair housing programs including affirmative fair marketing, outreach efforts and translation of vital documents.
8	Goal Name	Preserve Existing Housing Stock
	Goal Description	Preserve existing affordable housing through government subsidized housing and unrestricted private units occupied by and affordable to low and moderate income households. Strategies 1) maintain, support and preserve the existing housing stock 2) prevent housing deterioration and vacancies 3) prevent neighborhood deterioration due to foreclosures and vacancies.
9	Goal Name	Increase Supply of Affordable Housing
	Goal Description	Produce affordable restricted housing with time restrictions that meet or exceed the required affordability periods. Increase overall availability of affordable permanent housing through new units and the rehab of vacant and deteriorated units.
10	Goal Name	Special Needs Housing
	Goal Description	Focus is on populations that have special needs which are rarely served by the private market. Strategies: 1) develop services 2) support housing programs 3) provide funding for adaptive rehabilitation of owner occupied single and 2 family homes.

Projects

AP-35 Projects – 91.220(d)

Introduction

In considering funding priorities for this period, the City is attempting to address emergency critical needs that have been exasperated by COVID-19. The plan is to focus on the following: supporting and providing a broad range of public service needs for lower income residents; supporting other special needs, including housing and supportive services; improving the vitality of the City's downtown and increasing the appeal of local businesses opportunities; deteriorating rental housing stock and the on going need for more low income housing; accessibility modifications to public facilities to enable people with mobility impairments to enjoy public assets and services; and stabilization of foreclosed ownership properties and neighborhoods experiencing significant numbers of foreclosures.

In assigning priority to projects and need categories the City considers a variety of factors including community input, the community's emerging and critical needs, like the devastating foreclosure trend, significant public facility capital needs, and the service needs of residents; the number of low income people served; and the number and relative percentage of people in need.

The City of Brockton intends to support efforts to reduce crime; enhance the quality of community life through the provision of better public facilities, neighborhood stabilization efforts, and infrastructure improvements aimed at supporting economic development; and reduce poverty and improve the quality of life for people living at or below the poverty level by expanding economic opportunities and supporting vital social/public service providers and facilities that help create and/or retain jobs. The City will also act to stabilize, improve and increase access to owner occupied housing for low and moderate income residents, including addressing the community's significant needs relating to the foreclosure crisis and stabilize, improve and increase the supply of affordable rental units for low and moderate income community members as well as residents with special housing and service needs.

While this consolidated plan anticipates that priorities may shift as current projects are completed and new projects are added in future years, the 2020 Annual Plan will accomplish these objectives through the following projects.

Projects

#	Project Name
1	Business Assistance
2	CV Housing Cost Payments Assistance
3	COVID Impacted Public Services
4	CDBG Planning and Administration

#	Project Name
5	Public Services
6	Public Facilities
7	Homeowner Housing Rehabilitation Program
8	Lead Abatement Program
9	Commercial Rehabilitation
10	Acquisition and Rehabilitation
11	Housing Administration
24	Downtown Brockton T.O.D. - 121 Main Street
25	Lincoln School Senior Housing
26	New Construction 23-25 Park Street
27	Loss of Rental Income

Table 7 - Project Information

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

The basis for these allocation decisions lies in the ongoing consultations with the extensive network of public service agencies and public entities dealing with housing and community development issues in Brockton, public input from hearings and meetings, survey results and the experience of the lead agencies over many years.

Obstacles to meeting underserved needs are clearly attributable to insufficient resources with which to address the growing needs. Brockton’s CDBG entitlement has decreased over the past couple of years and the HOME funds have been decreased dramatically. These decreases have put a strain on the amount the City can provide for these projects. The pattern in recent years in terms of federal and state assistance to urban areas has generally been on the decline. For the FY2020, Brockton will receive an increase in funding for both CDBG and HOME and a supplement from CDBG-CV funds. With an emphasis on urban needs and on energy conservation assistance, Brockton is hopeful that with this increase in funding it will be better able to meet more of the housing and public service needs that continue to multiply in the city. As in other cities throughout the country, Brockton continues to face multiple and interrelated new housing and social problems stemming from subprime mortgages and foreclosures.

Throughout program year three (FY2020) the City of Brockton will continue to work as it has done in the past to pursue partnerships with an extensive network of providers and programs at all levels of government and in the private sector will be working to craft and employ effective responses to this ongoing national housing crisis. Brockton will employ any and all new public and private mechanisms that become available which could further meet the underserved needs and it will continue to seek out creative local approaches to addressing these identified and prioritized needs.

As the City of Brockton has seen an increase in many needs due to COVID-19 exasperating financial hardship in the community. We have added in projects based on research within the community, to help

fill in gaps that are unable to be filled by other funding sources at this time. This will be closely monitored and we will provide further amendments and improvements to ensure we continue to meet the communities greatest needs to the best of our ability.

AP-38 Project Summary
Project Summary Information

1	Project Name	Business Assistance
	Target Area	Downtown - Main Street Downtown Corridor/Business District City Wide
	Goals Supported	Promote Economic Development
	Needs Addressed	Economic Development
	Funding	CDBG: \$550,000
	Description	This project is designed to provide grants or loans to local Brockton businesses to boost business, ensure continued business, or add new streams to the business.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	We are hoping to assist 55 businesses with these funds, and up to 100 individual families and households with job retention or creation. This will assist working families employed by local businesses and local business owners and their families.
	Location Description	A priority is place on the Downtown for the business assistance grants, and the Section 108 Loan Program must be located within the Downtown.

	Planned Activities	There are two main planned activities with this project. The first comes from the \$1,500,000 in Section 108 Loan Fund, that will be for 3-6 businesses to assist in Kitchen Infrastructure to expand businesses through loans that will be repaid. The second activity is going to be for COVID-19 small business recovery efforts. We are hoping these funds will infiltrate the community and these businesses and allow them to find new ways of continuing business, make up small deficits that are occurring during their continued operations, and recovery to open up again as normal when the nation is ready for that.
2	Project Name	CV Housing Cost Payments Assistance
	Target Area	City Wide
	Goals Supported	Homeless Prevention Promote Services that Promotes Self Sufficiency
	Needs Addressed	Owner Occupied Housing Rental Housing
	Funding	CDBG: \$275,000
	Description	This project is designed to assist homeowners and renters with housing cost payments during these extra difficult economic times created by COVID-19. It will assist households below 80% AMI with rent, mortgage, or utilities up to \$4,000.00 per household each fiscal year, and not over a 3 month period.
	Target Date	6/30/2021

	Estimate the number and type of families that will benefit from the proposed activities	We are hoping that funding this project will assist at least 50 families facing unprecedented temporary financial hardships as this is not designed for long-term assistance of individual households.
	Location Description	
	Planned Activities	Assist households below 80% AMI with rent, mortgage, or utilities up to a determined limit each fiscal year, not designed for long-term assistance of individual households.
3	Project Name	COVID Impacted Public Services
	Target Area	City Wide
	Goals Supported	Stabilize and Improve At-Risk Neighborhoods Homeless and At-Risk of Homelessness Services Promote Services that Promotes Self Sufficiency
	Needs Addressed	Public Services
	Funding	CDBG: \$230,743
	Description	This project is designed to fund public services in the direct response to COVID-19 needs being created and adding increased needs from the local organizations.

	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	This funded project will assist low and moderate income families in Brockton that have experienced increased need for support from COVID-19 impacts. There will be nine different public services funded through this project line, which should all together serve at least 400 families in Brockton.
	Location Description	Various locations and service areas throughout the City.
	Planned Activities	Public services providing the direct response to COVID-19 needs being created and adding support for individuals in Brockton experiencing new and increased needs. This excludes the activity planned to assist homeowners and renters with housing costs.
4	Project Name	CDBG Planning and Administration
	Target Area	
	Goals Supported	<p>Preserve Existing Housing Stock</p> <p>Homeless Prevention</p> <p>Stabilize and Improve At-Risk Neighborhoods</p> <p>Promote Economic Development</p> <p>Homeless and At-Risk of Homelessness Services</p> <p>Promote Services that Promotes Self Sufficiency</p> <p>Special Needs Housing</p> <p>Revitalize Target Neighborhoods</p>

	Needs Addressed	
	Funding	CDBG: \$285,999
	Description	The Brockton Redevelopment Authority utilizes these funds for coordination oversight, implementation and compliance as it carries out the eligible CDBG activities identified in the One Year Action Plan.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
5	Project Name	Public Services
	Target Area	City Wide

	Goals Supported	Homeless Prevention Promote Services that Promotes Self Sufficiency
	Needs Addressed	Crime Reduction Public Services Homeless/HIV/Aids
	Funding	CDBG: \$215,000
	Description	This funded project will assist low and moderate income families in Brockton that need increased support to stay housed and self sufficient as a household.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	This funded project will assist low and moderate income families in Brockton that need increased support to stay housed and self sufficient as a household.
	Location Description	
	Planned Activities	
6	Project Name	Public Facilities

Target Area	City Wide
Goals Supported	Homeless and At-Risk of Homelessness Services Promote Services that Promotes Self Sufficiency
Needs Addressed	Public Facilities
Funding	CDBG: \$235,000
Description	This project is to support public facility improvements in the City of Brockton. These improvements should be made to such facilities to improve their capacity, increase community access or use, or make safety or health improvements necessary for continued use/operation.
Target Date	6/30/2021
Estimate the number and type of families that will benefit from the proposed activities	We are hoping to assist public facility improvements that service or are available to service the entire city at this time, specifically with access to goods and services to maintain basic living needs. With a number of serving at least 15,000 households a year with this amount of funding, across four different locations/organizations.
Location Description	

	Planned Activities	
7	Project Name	Homeowner Housing Rehabilitation Program
	Target Area	City Wide
	Goals Supported	Preserve Existing Housing Stock Stabilize and Improve At-Risk Neighborhoods
	Needs Addressed	Owner Occupied Housing
	Funding	CDBG: \$450,000
	Description	The Brockton Redevelopment Authority will provide funding in the form of deferred payment loans to qualified low and moderate income property owners in the City of Brockton. The funds will be expended according to the scope of work to be completed and will not exceed \$30,000.00 for single family homes and \$35,000.00 for two-family homes. Lead Paint removal and energy efficiency costs may exceed this amount. For single family home owners or two family owner occupied homes, this is an interest free loan for residents who meet the U. S. Department of Housing and Urban Development income guidelines. A lien will be placed on the property, and should the owner refinance, transfer ownership or in the case of death, the total amount of the loan must be paid back in full.
	Target Date	6/30/2021

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
8	Project Name	Lead Abatement Program
	Target Area	City Wide
	Goals Supported	Preserve Existing Housing Stock Stabilize and Improve At-Risk Neighborhoods
	Needs Addressed	Owner Occupied Housing Rental Housing
	Funding	CDBG: \$120,000
	Description	Lead Base-Paint Hazard Control Program grant match for 3 year grant to the City of Brockton, to deleading and health home funding gaps for low to moderate income homeowners.

	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
9	Project Name	Commercial Rehabilitation
	Target Area	Downtown - Main Street Downtown Corridor/Business District
	Goals Supported	Stabilize and Improve At-Risk Neighborhoods Promote Economic Development Revitalize Target Neighborhoods
	Needs Addressed	Economic Development Infrastructure
	Funding	CDBG: \$150,000

	Descri ption	CDBG funds will be used in our revitalization districts to secure and stabilize property.
	Target Date	6/30/2021
	Estima te the numbe r and type of familie s that will benefit from the propos ed activiti es	
	Locati on Descri ption	
	Planne d Activiti es	
1 0	Project Name	Acquisition and Rehabilitation
	Target Area	City Wide
	Goals Support ed	Preserve Existing Housing Stock Increase Supply of Affordable Housing Increase Access for Homeownership
	Needs Address ed	Owner Occupied Housing Rental Housing

Funding	CDBG: \$360,000
Description	Funds will be loaned towards the acquisition, rehabilitation of vacant, abandoned and/or foreclosed housing under the Brockton "Receivership" program. After rehabilitation, property will be sold to income eligible first-time homebuyer. Brockton Receivership Program (BRP) will target blighted neighborhoods to prevent or eliminate elements of slum/blight; specifically troubled property in Brockton neighborhoods. The program is designed to repair and address unsafe and unsanitary housing per the state sanitary code, returning them as lead and asbestos free; energy efficient and properly weatherized homes. At its best the houses will become homes to low and moderate-income families. Homes that are actually foreclosed upon will remain available to low and moderate-income families through the use of restrictive covenants.
Target Date	6/30/2021
Estimate the number and type of families that will benefit from the proposed activities	
Location Description	
Planned Activities	

1 1	Project Name	Housing Administration
	Target Area	City Wide
	Goals Supported	Preserve Existing Housing Stock Increase Supply of Affordable Housing Stabilize and Improve At-Risk Neighborhoods Promote Services that Promotes Self Sufficiency Revitalize Target Neighborhoods Increase Access for Homeownership
	Needs Addressed	Owner Occupied Housing Rental Housing
	Funding	CDBG: \$250,000
	Description	Funds will be used to support the implementation of all BRA housing programs and activities.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	

	Planned Activities	
1 2	Project Name	Downtown Brockton T.O.D. - 121 Main Street
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	:
	Description	<p>Downtown Brockton T.O.D. is a 48-unit 100% affordable rental housing development. As an in-fill and smart-growth project with a small ground floor commercial component, it will bring life back to a vacant and abandoned parcel in the heart of Downtown helping to continue the ongoing revitalization of central Brockton, one of the Commonwealth's critically important Gateway cities. Located just a few blocks from the Downtown Brockton Commuter Rail stop, the site is excellent for new housing within walking distance of schools and proximate to grocery stores, other commercial/retail options, parks and recreational attractions. The project is close to many service providers including the Brockton Neighborhood Health Center and NWSOMA's own Brockton office, which is directly across the street.</p>
Target Date	6/30/2021	

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
13	Project Name	Lincoln School Senior Housing
	Target Area	
	Goals Supported	Increase Supply of Affordable Housing
	Needs Addressed	Rental Housing
	Funding	:

Descri ption	<p>The City of Brockton designated Housing Solutions for Southeastern Massachusetts (HSSEM) to redevelop the Lincoln School property located at 70 Highland Street in Brockton. It is located within a half mile of the bus depot and train station. The property will be redeveloped into 39 units of senior housing of which three will be studios and 36 will be 1-BR apartments. HSSEM's property manager HallKeen will provide on-site Resident Services to the residents. At least 16 units will be reversed for ELI households with incomes at or below 30% of AMI. Formerly homeless households will make up at least four of the 16 ELI households. The remaining 23 units will serve 60% AMI households. The former school property is in a proposed historic district known as Blanchard Plat area. The Lincoln School is a two-story on a raised basement, Richardsonian Romanesque-style building that was constructed in two parts. The main, central block of the building was constructed in 1896 and the east and west wings were constructed in 1911. The building fronts on Highland Street on an irregularly shaped lot at the southeast corner of the intersection with Newbury Street. The lot gradually slopes to the south, providing a full-height basement at the south (rear) elevation. A sidewalk edged by concrete curbing runs along the streets. Concrete paths access the entrances in the center of the main block and each wing. A large, partially paved parking lot extends across the south and east ends of the property.</p>
Target Date	6/30/2021
Estima te the numbe r and type of familie s that will benefit from the propos ed activiti es	
Locati on Descri ption	

	Planned Activities	
14	Project Name	New Construction 23-25 Park Street
	Target Area	
	Goals Supported	Increase Supply of Affordable Housing Increase Access for Homeownership
	Needs Addressed	Owner Occupied Housing Rental Housing
	Funding	:
	Description	The Brockton Redevelopment Authority will utilize HOME funds to develop a new construction of two units which will be sold to a first time homebuyer eligible under program guidelines. This is an initiative to increase access to homeownership and address the needs of affordable housing in the City of Brockton.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	

	Location Description	
	Planned Activities	
15	Project Name	Loss of Rental Income
	Target Area	
	Goals Supported	Promote Services that Promotes Self Sufficiency
	Needs Addressed	Rental Housing
	Funding	:
	Description	This project is going to assist with loss of rental income from this COVID-19 period, either with a direct Tenant-Based Rental Assistance program or through assisting previous HOME Program rental projects experiencing a loss of rental income from their tenants.
	Target Date	12/31/2020

<p>Estimate the number and type of families that will benefit from the proposed activities</p>	<p>With this amount of funding we are hoping to assist at least 40 families renting their homes, facing unprecedented temporary financial hardships as this is not designed for long-term assistance of individual households or 40 HOME Program Rental units.</p>
<p>Location Description</p>	
<p>Planned Activities</p>	<p>Assist with loss of rental income from this COVID-19 period, either with a direct Tenant-Based Rental Assistance program or through assisting previous HOME Program rental projects experiencing a loss of rental income from their tenants.</p>

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

Downtown Core Neighborhoods Census Tract 5109 had 79% of the households listed in the ACS as low and moderate income. This neighborhood is in the very core of the city. This area is a high crime area and is patrolled by the specially equipped Brockton Police Anti Crime Unit.

Highland, Newbury and Green Street Neighborhoods Census Tract 5108 has 61% of the households listed in the 2010 Census as low and moderate income. The City has made great strides in this area relative to home acquisitions and renovations. Although there is still much to do, the City has committed to completing projects by way of renovations to vacant or abandoned properties to bring them to habitable condition and demolitions of properties that are beyond repair.

Montello Neighborhood There are two low and moderate income census tracts with this neighborhood, census tract 5105-02 and 5103. The City of Brockton and the Brockton Redevelopment Authority will assist homeowners in these census tracts with repairs to their homes and will concentrate on vacant or abandoned properties within these areas.

The Village Census Tract 5110 is within this neighborhood and is made up of 65% low and moderate income residents.

Campello Neighborhood Census tract 5114 and 5116 are within the Campello Neighborhood and has 52% of its residents low and moderate income in tract 5114 and 51% in Census Tract 5116.

East Side Neighborhood Census Tract 5112 has 52% of the residents listed as low and moderate income.

Pleasant/Prospect Neighborhood is within census tract 5104 and has over 52% of its residents listed as low and moderate income households.

Geographic Distribution

Target Area	Percentage of Funds
Downtown - Main Street	12
Downtown Corridor/Business District	5
City Wide	60
Census tract 5104, 5108, 5109, 5114	5
Low and Moderate Census Tracts	18

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Overall, the City of Brockton is more than 51% low to moderate income households, so most efforts are designed to target City Wide as the need is not central. However, we end up with a few target areas as focusing extra efforts and funding into one area at a time for revitalization can make a larger impact in the short term, so we could then move on to a new area. The City's Downtown has been a major focus for the City the last few years now and will continue to be as we are now finally making large strides as a City. The Census tracts 5104, 5108, 5109, 5114 are right in and around Downtown and have been identified for having the highest crime rates at the moment in Brockton. Lastly, while the City as a whole is 51%, or more, low to moderate income households, a few census tracts on the edges of the City do not have a majority low income population, so we will focus on those that do for public facilities, park renovations, public services, and rental housing and rental housing cost assistance when possible.

Discussion

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

There are a number of services and programs which will assist the achievement of the housing goals. Listed below are the programs that will assist in providing affordable housing to families in the City of Brockton. NeighborWorks Housing Solutions will provide 48 rental units in the downtown area in which 11 are HOME assisted units; NeighborWorks Housing Solutions will provide 39 rental housing units for senior citizens in which 3 will be HOME-assisted units; the Greyson Hotel is being looked at for rehab and conversion to residential facility as 18 micro studios with 3 HOME-assisted units; the Brockton Redevelopment Authority will utilize a combination of HOME funds and private financing to develop a new construction of 2 units in which one will be HOME-assisted; and the Rescue of Foreclosed Homes activity for rehabilitation and sale of three homes in the City for qualified potential homeowners. Additionally, we are planning on a Tenant Based Rental Assistance Program to support at least 45 households.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	19
Special-Needs	0
Total	19

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	45
The Production of New Units	19
Rehab of Existing Units	3
Acquisition of Existing Units	0
Total	67

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

The HOME funds will be used to leverage private investment for the development of units for moderate income families city wide. Brockton must create neighborhoods that are financially viable for those who inhabit them.

AP-60 Public Housing – 91.220(h)

Introduction

The Brockton Housing Authority (BHA) manages over 2,000 apartments in 16 public housing developments throughout Brockton as well as 1,000 rent-assisted apartments/houses. The approximately 85 employees of the BHA serve about 7,000 residents, or about 7% of Brockton's population. The Authority also manages programs to help develop affordable private homes for ownership and rental that enable families to move beyond public assistance and become self-sufficient. The BHA currently has list for public housing and the Housing Choice Voucher programs that are in excess of 5 years long.

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

- Continue comprehensive modernization at Caffrey Towers
- Complete energy efficient upgrades to all federal developments
- Complete installation of new fire alarm systems in: Belair Tower, Belair Heights, Caffrey Towers and Campello High Rise;
- Installation of 15 UFAS compliant automatic door openers at Elderly/Disabled developments
- Begin installation of security cameras at Elderly/Disabled developments
- Removal of deteriorated carpet and installation of 49,000 square feet of new vinyl tile flooring at Elderly/Disabled developments
- Installation of 80 new closet doors at Belair Tower
- Continue comprehensive replacement of exterior components at 19 buildings at Hillside Village
- Begin replacement of 10 obsolete elevators in three elderly/disabled developments

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

The goal of involving public housing residents in the management of the Brockton Housing Authority began in earnest fourteen years ago. At that time the Director of Operations and the Resident Services Coordinator began to meet with tenant council presidents and leaders of the developments throughout the authority monthly. Prior to this, residents across the city were not a united group but managed the business of their buildings on a very individual basis. Having the opportunity to meet monthly with BHA staff began a journey of 14 years that bring us to a place where we have good communication, a strong ability to work together and for residents to initiate and maintain an organizational framework to successfully lead their residents.

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

provided or other assistance

The Public Housing Authority is not in trouble.

Discussion

The BHA continues to seek additional resources to assist in the modernization of its existing public housing stock and to work with partners to develop livable neighborhoods. The BHA recently refinanced a previous capital fund bond that has realized \$5.8 million to be utilized for improvements at several developments. The BHA also executed an energy performance contract that is allowing the BHA to borrow \$5.3 million dollars to install energy savings devices within its public housing including new refrigerators, lighting, toilets and shower heads. These funds will also enable the BHA to replace ten elevators in its high rise developments. There is substantial change proposed in the delivery of public housing in the Commonwealth of Massachusetts that could cause significant change in the way public housing is governed and managed.

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

Introduction

The City of Brockton and Father Bill's and MainSpring partner with community entities to conduct outreach and engage the unsheltered homeless community and would like to prioritize this group for possible housing subsidies through Brockton Housing Authority. Additionally, the development of one resource/opportunity center with community partners would be an ideal method for assessing the individual needs of those who are homeless or are in danger of being homeless. The City would also like to participate in a community run group to identify chronic people living on the street and provide targeted outreach and housing resources.

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 Old Colony YMCA and Father Bills and Mainspring both have outreach workers to meet with the homeless on the streets of Brockton to begin getting them the services they need. They are provided with the same information and opportunities for wrap-around services no matter the point of contact in which the organizations meet them.

Addressing the emergency shelter and transitional housing needs of homeless persons

Father Bill's and MainSpring will continue to shelter individual and families with the goal of additional permanent housing resources internally and externally. They will also collect data and analyze it, in addition to getting provider and consumer input.

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

Father Bill's and MainSpring would like to see collaboration within the community to help at least 10 chronically homeless individuals/families move into homes annually each year for the next 5 years, totaling 50 units for 50 individuals/families. Father Bill's and MainSpring would also like to continue to develop family housing and housing for veterans in the community.

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.

Father Bill's and MainSpring provides data to the Interagency Council on Housing and Homelessness on discharges that come to the facilities to better coordinate/communicate with the state and other systems of care.

Discussion

Helping homeless individuals and families is and will continue to be a challenge in Brockton. The solution to this problem will entail a collaborative and multi-pronged effort including the creation of living wage jobs in Brockton for Brockton residents and affordable housing opportunities, along with services for those with mental health and substance abuse challenges, and assistance for persons with disabilities. Only by tackling all of these challenges in a collaborative manner will the City end homelessness.

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

Introduction:

There is a state law that requires local government to have at least 10% of its housing stock subsidized and dedicated to households below 80% median income in order to retain full control over the zoning permit process when affordable units are proposed. That nature of affordability is defined by the state and generally must be for at least 15 years for rehabbed housing units and 30 years for newly created units. This law gives the state the power to override local decisions regarding affordable housing projects, whether those decisions are based on zoning by laws or other arguments such as impact on schools, environmental issues, infrastructure limitations, etc. A local community can amend its bylaws and procedures for a specific project and gain exemption from this law under what is known as and controlled by state regulations. Limited public funding and private investment interest are remaining key barriers to increasing the supply of affordable housing.

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

The City has taken steps to create zoning which will promote affordable housing development such as Chapter 40R. The City of Brockton has designated five “Smart Growth” development districts which provide incentives for the development of affordable housing adjacent to transportation centers.

The City has also been exploring the use of an overlay zoning to facilitate this use.

Limited public funding and private investment interest are remaining barriers to increasing the supply of affordable housing. Nevertheless, the City is taking steps to create attractive development and redevelopment opportunities including improving the appearance and curb appeal of business districts, by demolishing derelict buildings and by clearing and cleaning up vacant lots.

Discussion:

AP-85 Other Actions – 91.220(k)

Introduction:

The City has engaged in extensive, collaborative and public planning to improve economic opportunity, housing choices, and public facilities and overall quality of life. The envisioned community improvements and investments will utilize public and private resources to address the needs identified through the planning process. The City's investments will add to the revitalization of neighborhoods and provide adequate infrastructure to support private housing and economic development.

Actions planned to address obstacles to meeting underserved needs

Obstacles to meeting underserved needs are clearly attributable to insufficient resources with which to address growing needs. Brockton's entitlement amounts for CDBG and HOME as well as other federal and state assistance to urban areas have been on a downward trend over the past few years so there has been a lot of work with other organizations in the City to leverage funding and find other sources and means to meet underserved needs. The goals with most funded projects from CDBG and HOME are designed to assist more than with just that immediate financial support, but to give households the tools needed to require less support in the future or with other areas of their lives.

Actions planned to foster and maintain affordable housing

Brockton's limited supply of affordable housing is one of the community's most significant barriers to housing choice. Lower income households experience a higher rate of housing problems than other households in Brockton, and this impacts minority households and people with disabilities in the community disparately because they are more likely to be low income households.

The City of Brockton will continue to work with local and regional nonprofits and others to pursue opportunities to develop new affordable housing. Networks like the Massachusetts Smart Growth Alliance can provide resources and organizing support to promote equitable growth, including increased housing opportunities.

Actions planned to reduce lead-based paint hazards

The City of Brockton and the Brockton Redevelopment Authority will work closely with intake partners Self Help Inc. and Neighborworks of Southern MA to reduce, if not eliminate lead-based paint from properties in the City of Brockton. In the 2017 program year, the City of Brockton provided \$275,000.00 of matching funds for an award by HUD's Office Lead Hazard Control and Healthy Homes (OLHCHH).

Additionally, the Brockton Redevelopment Authority runs a Homeowner Rehabilitation program to benefit low and moderate-income residents. When lead is present in these homes, the CDBG Program Manager will inform the homeowners of the BRA's lead program to help rehabilitate and de-lead the

property.

Actions planned to reduce the number of poverty-level families

Most activities undertaken by the City with CDBG, HOME and other federal and state funds for low income families are efforts to reduce the number of persons in poverty and improve the quality of life for Brockton residents, either directly or indirectly. City staff also work in partnership with citizens, other City departments and the public and private sectors to accomplish its goal of reducing poverty.

For this coming year, the City will be undertaking the following programs which it believes will impact those families living in poverty:

The City's new Annual Plan for FY2020 offers its support of those projects and programs that bring income stability to Brockton's low and moderate income households including those projects and programs that generate or retain jobs or provide workplace preparedness programming.

The City proposes funding such initiatives including the following:

Father Bill's and Mainspring – Work Express Program The Work Express program is designed to provide homeless persons with an opportunity to become productive citizens of the community through employment and independence by means of transitional housing, intensive case management, substance abuse counseling and basic skills development with a primary objective of helping unemployed homeless individuals reenter the workforce. Community Development Block Grant funds will be used to pay the salary of program employees and to supplement stipends paid to the program participants.

Old Colony YMCA David Jon Louison Family Center The Old Colony YMCA provides programs for families experiencing homelessness. The program provides emergency shelter and housing, case management and support services to families in order to reach a higher level of self-sufficiency.

Business Assistance MassHire is operating a program from COVID Relief funds to support local small businesses who employ low and moderate income employees with up to \$10,000.00 per business if they can show that they are able to hire or retain these employees. They are encouraged to attend MassHire workshops to build a better business as well.

Actions planned to develop institutional structure

The Brockton Redevelopment Authority (BRA) will carry out the FY2020 Annual Plan on behalf of the City of Brockton. The BRA is accountable to the Mayor, as Chief Executive Officer of the City of Brockton. Day-to-day responsibility for administration of the CDBG and HOME programs and certain other grant funded activities will rest with the CDBG Program Manager and the Executive Director of the BRA. The Brockton Redevelopment Authority Director will also be responsible for energy policy coordination and

long-term planning functions on behalf of the City. The BRA had the responsibility for preparing, submitting and implementing all previous Consolidated Community Development Plans and Action Plans as well as for managing the consultation and Citizen Participation processes, preparing annual CAPER(s) and interacting with HUD representatives. The BRA previously played a central and critical role in the planning, implementation and coordination of Brockton's multi-faceted and interrelated community and economic development efforts. As the BRA partners with other public agencies such as the Brockton Housing Authority and with community based and/or private organizations in order to carry out projects and programs covered by the Consolidated Plan, the BRA nonetheless will remain the agency ultimately responsible for administering those programs.

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

The City will continue to work closely with its non-profit partners to both monitor the success of existing programs and generate ideas for new programs to serve the changing needs of Brockton's low income population. BRA Staff will meet with sub-grantees during the year to assess the existing program and discuss changes needed as well as ideas for new directions. The BRA Staff will also meet with non-profit and public housing providers to reassess needs and opportunities.

The Brockton Redevelopment Authority and Brockton Housing Authority regularly interacted with locally and regionally based agencies and community-based organizations seeking ideas and input as to the most pressing needs facing the City of Brockton, particularly its low- and moderate-income and minority populations. Again this year, the BRA and the BHA relied heavily on these consultations in developing this Annual Action Plan. The BRA and BHA encourage and maintain open lines of communication with all of these organizations and agencies. This has been the case in the development of the Annual Action Plan as well as the Consolidated Five Year Plan.

Discussion:

Program Specific Requirements

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

Introduction:

The BRA collected program income in FY2019, however all of those funds have been reprogrammed at this time. Program income when it comes in is reallocated to the program line that it was repaid from less 20% to go back to administrative costs. There are no proceeds from the City's Section 108 Loan at this time to address the priority needs and objectives.

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

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.	99.00%

HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(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:

Period of Affordability

The minimum period of affordability is determined by the HOME subsidy amount per unit:

<\$15,000 = 5 Year Minimum

\$15,000 to \$40,000 = 10 Year Minimum

> \$40,000 = 15 Year Minimum

Resale Provisions

Resale provisions shall be required when the subsidy is provided in the form of a development subsidy in which HOME funds are divided among each assisted unit and not provided as a direct subsidy to the homebuyer. The resale option ensures that the assisted unit remains affordable over the entire period of affordability. Affordable units shall meet the following criteria:

- The new purchaser must be low-income, meeting the HOME Program definition, and occupy the property as the family's principal residence.
- The sales price must be affordable to low-income families at 70-80% of area median income paying no more than 32% of income for principal, interest, property taxes and insurance.
- Under no circumstances may the affordable sales price exceed 95% of the median purchase price for the area.
- Net proceeds from the sale must provide the original homebuyer, now the home seller, a fair return on their investment (including any down payment and capital improvement investment made by the owner since purchase, as calculated using the following formula: Maximum Permitted Resale Price = (The initial sales price/Initial AMI) x Resale AMI

Resale requirements shall be enforced through deed restrictions, covenants, land use restriction agreements, or other similar mechanisms filed with the Registry of Deeds and the requirements within shall be triggered upon sale or transfer of the property.

Recapture Provisions

Recapture provisions shall be enforced in cases where HOME funds are provided as a direct subsidy

to the homebuyers as down payment, closing costs and/or purchase price assistance. This allows the city to recapture the subsidy, subject to net proceeds, if the recipient decides to sell the unit within the period of affordability at whatever price the market will bear. The homebuyer may sell the property to any willing buyer. The sale of the property during the period of affordability triggers repayment of the direct subsidy, subject to net proceeds, to the HOME Investment Partnerships local account. The recapture provision shall be enforced through a mortgage filed with the Registry of Deeds, and a note filed at the offices of the Brockton Housing Authority. The city elects to reduce the amount subject to recapture on a prorated basis for the time the homeowner has owned and occupied the home measured against the required affordability period. Net proceeds are the sales price minus the superior non-HOME loan and closing costs. Upon receipt of recaptured funds the city shall prepare a discharge of mortgage document for the original homebuyer to record with the Registry of Deeds.

Home Affordable Homeownership Limits

We use the HOME affordable homeownership limits provided by HUD for the Brockton, MA HUD Metro FMR area.

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:

City of Brockton - Resale and Recapture Guidelines for Homebuyers - 24 CFR 92.254(a)(5)

Period of Affordability - See above

The City of Brockton, acting through subrecipients, CHDOs or other entities, may use HOME Program funds to provide homeownership assistance. The forms of subsidy to be used to assist homebuyers and/or developers may include down payment and closing cost assistance, development cost subsidy, deferred payment loans or some combination of these methods. The City of Brockton shall determine, based upon the type of subsidy, whether the period of affordability shall be enforced by either Resale or Recapture provisions.

Resale Provisions

Activity Types – Resale provisions as outlined in 24 CFR Part 92.254(a)(5)(i)(A) and (B) shall be required when the HOME subsidy is provided in the form of a development subsidy in which HOME funds are divided among each HOME-assisted unit and not provided as a direct subsidy to the homebuyer.

Methods – The resale option ensures that the HOME-assisted unit remains affordable over the

entire period of affordability.

The new purchaser must be low-income, meeting the HOME Program definition, and occupy the property as the family's principle residence.

- The sales price must be “affordable to a reasonable range of low-income homebuyers”, defined as a family at 70-80% of area median income paying no more than 32% of income for principal, interest, property taxes and insurance.
- Under no circumstances may the “affordable” sales price exceed 95% of the median purchase price for the area.
- Net proceeds from the sale must provide the original homebuyer, now the home seller, a “fair return” on their investment (including any down payment and capital improvement investment made by the owner since purchase. Capital improvements are not considered to be normal “wear and tear” or maintenance replacement items. In general, the City of Brockton shall consider “fair return” to be the maximum sales price as calculated using the following formula:

Initial Area Median Income is defined as the Area Median Income corresponding to a household size at the time of purchase.

Resale Area Median Income is defined as the Area Median Income corresponding to a household size at the time of intent to sell.

Enforcement Mechanisms – Resale requirements shall be enforced through deed restrictions, covenant, land use restriction agreement, or other similar mechanism filed with the Plymouth County Registry of Deeds and the requirements within shall be triggered upon sale or transfer of the HOME-assisted property.

Recapture Provisions - See above

Repayments – Repayments of recaptured funds shall be remitted directly to the City of Brockton HOME Investment Partnerships Program local trust account.

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:

No refinancing is proposed

Eligible applicants are individuals/families at or below the 80% AMI. Funding applications for HOME is a rolling application, and CDBG is first-come first-serve basis as long as funding is available. Information are available in our website and our office.

We have no limits/preferences to a particular segment of the low-income population.

