

# Fitchburg-Leominster Consortium Five-Year Consolidated Plan 2022- 2026 and Program Year 48 Annual Action Plan



**Presented to:**  
Community Development and Planning Department,  
Fitchburg, MA & the  
Planning, Development, CDBG, and Housing Department  
Leominster, MA

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Consolidated Plan  
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FITCHBURG

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## **Executive Summary**

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

#### **1. Introduction**

Fitchburg is a gateway city with a rich agrarian and industrial history. The City is located on the Nashua River in North Central Worcester County, wedged in central Montachusett Valley. First settled by English colonists in the mid-18th century (1735), it was incorporated in 1764 and became a city in 1872. The City was a bustling paper and textile manufacturing hub at its height. Following the end of the Industrial Revolution, it fell into economic decline. The City also saw a shift in demographic trends over the past 100 years. Most notably, several waves of Hispanic immigrants moved there and now represent a large percentage of the population.<sup>2</sup> Today, the City is actively pursuing community development, housing, and economic development initiatives, including partnerships with service agencies and securing alternative grants/funding sources to revitalize, especially in its target areas. The United States Department of Housing and Urban Development (HUD) awards funding annually to Fitchburg and Leominster, forming the HOME Consortium. The Cities of Fitchburg and Leominster are considered Entitlement Grantees under the CDBG program and Participating Jurisdictions (PJs) under the HOME program. These grants are federal Community Development Block Grant (CDBG) and the HOME Investment Partnerships Program (HOME) funds. They are authorized under Title 1 of the Housing and Community Development Act of 1974, Public Law 93-383. The programs provide grants on a formula basis to states, cities, and counties across the nation to aid in developing viable urban communities via quality housing, suitable living environments, and economic opportunities, principally for low- and moderate-income (LMI) persons.

#### **Additional Text**

Fitchburg is the lead agency in the Fitchburg-Leominster Consortium. As the lead, it is responsible for submitting the Five-Year Consolidated Plan. The Consolidated Plan is a collaborative planning effort outlining how the City will spend its CDBG and HOME allocations on economic development, housing, public facilities/infrastructure, and public services over the next five years. HOME is the largest federal block grant to state and local governments exclusively for creating affordable housing for low-income households. HOME and CDBG funding Recipients often use these funds in concert. The Consolidated Plan's submission requirements are dictated by 24 CFR Part 91. The Plan involves an extensive Needs Assessment of the community ranging from job creation, housing rehabilitation, and homelessness services to recreation and facility improvements. The Market Analysis supplements the Needs

Assessment by evaluating local supply and demand for housing, barriers to housing access, and housing affordability. Based on these findings and the results of the comprehensive Citizen Participation Process (CPP), priorities and goals are established, and a Strategic Plan is compiled to guide funding decisions. Each section of the Consolidated Plan is developed within the confines of the federal regulations. Under these regulations, CDBG grantees must work toward achieving at least one of the three national objectives: benefit low- and moderate-income (LMI) persons; aid in the prevention or elimination of slums or blight, and; meet a need having a particular urgency (referred to as urgent need). HOME PJs must support one of the four affordable housing activities: homeowner rehabilitation, homebuyer activities, rental housing, and tenant-based rental assistance (TBRA). The CDBG and HOME programs have been assets for many years. The Community Development and Planning Department administers the funding, completing necessary reporting and monitoring, administrative oversight, and technical assistance subrecipients to remain in compliance. Related reports are completed in conjunction with the Consolidated Plan, such as Annual Action Plans (AAPs) and Consolidated Annual Performance and Evaluation Reports (CAPERs) for each program year. This Consolidated Plan will be submitted with the Consortium's Program Year 48 AAP.

Please note this Executive Summary primarily reflects information for the City of Fitchburg, and a separate Executive Summary is in the City of Leominster's CDBG Consolidated Plan. The Plan represents a collaborative effort for Fitchburg's government, public/private agencies, and citizens to develop a comprehensive strategy to meet housing and community development needs. Please also note that the City does not have a HUD-approved Neighborhood Revitalization Strategy Area (NRSA) at this time. An NRSA is a designated area targeted for revitalization and afforded added flexibility in undertaking economic development, housing, and public service activities with their CDBG allocation.

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

HUD's Outcome Performance Measurement System for Community Planning and Development (CPD) Formula Grant Programs allows grantees to assess program and activity performance and whether/to what extent they are meeting needs and goals. There are four actions that grantees and their partners need to take when following the CPD Outcome Performance Measurement System:

- Determine the intent (or goals) of their program activities;
- Select objectives and outcomes;
- Record objectives and outcomes in IDIS; and
- Report on indicators in IDIS.

The system outlines the following objectives for Consolidated Plan compliance: Providing Decent Housing, Creating Suitable Living Environments, and Creating Economic Opportunities. The objectives capture the range of community impacts from program activities. Outcomes are related to objectives, refining and capturing the change, or the expected results, of the objectives a grantee wishes to achieve. HUD created three desired outcomes as part of the Outcome

Performance Measurement System: Affordability, Availability/Accessibility, and Sustainability.<sup>3</sup> Once the grantee has established the program purpose (objective) and intended result (outcome), the next step is to identify how to measure progress toward achieving results via indicators. Indicators are categorized as common indicators, reported for nearly all program activities, or activity-specific indicators, relevant only for a specific activity. Indicators measure progress throughout the Consolidated Plan period. Common indicators can include: funds leveraged; the number of persons/households/businesses/units/beds assisted; income levels of persons/households at 30 percent, 50%, 60% or 80% of Area Median Income (AMI); and race/ethnicity/disability data for activities reporting such data elements. Goal Outcome Indicators and objectives are outlined in detail in the Strategic Plan and the Program Year (PY) 48 Annual Action Plan.

### **Additional Text**

The Consortium's main objectives include public services, facility upgrades, economic development, administration, demolition/clearance, rehabilitation, and redevelopment. The Citizen Participation, Needs Assessment, and Market Analysis sections produced the following needs, also outlined in the Strategic Plan:

- Streetscape, parks and open space, and other infrastructure and facility improvements, including increasing accessibility and alternative energy projects;
- Mental health, substance abuse/addiction, crime prevention and youth services support and expansion;
- Small/microenterprise technical assistance, façade improvements, and business district improvements;
- Neighborhood revitalization strategies such as property redevelopment and addressing slum/blight and vacancies;
- Housing rehabilitation and repairs, code enforcement for substandard or vacant housing, and blight clearance; and
- Emergency shelter programs, shelter upgrades, homelessness services, and support to address homelessness.
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### **3. Evaluation of past performance**

The City has overseen the completion of several projects through its involvement in the CDBG and HOME programs. Programming has proven to be timely and successful in meeting objectives and outcomes. The continued investment of resources helps Fitchburg achieve priorities and stated goals. Despite successful implementation of prior Consolidated Plans, the City still sees gaps between available funding and the cost of meeting needs, the costs of facility and infrastructure upgrades, rehabilitation/repair, and new construction often exceed their funding levels. The City has leveraged dollars from state, federal, and private partners through ongoing efforts, including providing technical assistance for applicant readiness and gap funding for projects. LMI residents and business owners also

continue to face challenges with housing affordability, availability of adequacy, access to job opportunities, childcare, transportation, and mental health services. These persistent challenges require the continued pursuit of goals in prior Consolidated Plans. Previously, the City's goals have been to increase affordable housing, provide economic opportunities, and eliminate homelessness. Today, those needs remain top priorities and were recurring topics during the CPP process. Nevertheless, the City has made strides in implementing its Downtown Urban Revitalization and Development Plan, including revitalizing Main Street, creating access to the Nashua River via the Twin Cities Rail Trail, housing rehabilitation, and blight clearance in target areas. A summary of disbursements from the recent CDBG Summary of Accomplishments Report (PR-23) is below.

[See Appendix for Figure ES-05.1]

A summary of the Consortium's HOME Program Performance SNAPSHOT, a report published by HUD that compares local, state, and national performance progress, is below

[See Appendix for Figure ES-05.2]

#### **4. Summary of citizen participation process and consultation process**

The 2022-2026 Consolidated Plan and PY48 (2022) AAP's CPP involved multiple forms of outreach. The Plan's consultant hosted a public hearing to the Consolidated Plan Advisory Committee, a hearing on the draft plan, and a hearing on the final plan before submission via the Integrated Disbursement and Information System (IDIS). Fitchburg and Leominster staff circulated an online Community Needs Survey, with paper versions available upon request. Fitchburg offered a Spanish translation of their survey. There were also separate surveys for social service agencies and shelter providers. Focus groups for each City took place over two days in March 2021 to gather expertise. The consultant provided flyers and templates for web page and social media postings and ongoing consultations. The draft Consolidated Plan and AAP were available for a 30-day public comment period before final submission.

Prior planning efforts and associated outreach before this Consolidated Plan complemented the CPP. For example, information from the 2018 Economic Development Strategic Plan and Economic Trends Report, the Vision 2020 Comprehensive Master Plan, the Land Development Guide, the 2014-2021 Open Space and Recreation Plan Update, Fitchburg State University's 2020- 2025 Strategic Plan, and the 2000 Downtown Fitchburg Urban Revitalization and Development Plan informed sections of this Plan. Ongoing initiatives/organizations that informed this plan include Relmagine North of Main, MassDevelopment's Transformative Development Initiative (TDI), the Fitchburg Redevelopment Authority, North Central Massachusetts Development Corporation, and the Montachusett Regional Planning Agency.

An outreach process is critical, as it offers multiple occasions for the community to provide input. This broad process confirms that Fitchburg invests according to resident needs and that the City's goals and priorities are relevant to the community. Future reporting (CAPERs, AAPs, substantial amendments, etc.)

to AAPs rely on the Consolidated Plan's original CPP. Please note that AAP amendments must be made public and are subject to a separate public process. Further information on Citizen Participation for this Consolidated Plan is in section PR-15.

## **5. Summary of public comments**

A summary of comments is in PR-15, Table 4 of the Citizen Participation Plan. Minutes of all meetings/public hearings are in the Appendix.

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

The City accepted all comments.

## **7. Summary**

The Consortium and the City of Fitchburg commissioned a thorough CPP for the 2022-2026 Consolidated Plan update. The CPP, the ACS, Census, CHAS, and related datasets informed the Needs Assessment and Market Analysis. Both sections underscore community needs through a detailed demographic, economic, and housing market assessment. The Strategic Plan outlines how the City will address needs based on the data via established goals and the institutional delivery structure. Lastly, the AAP details these efforts during each program year throughout the Consolidated Plan period (one AAP for each year from 2022-2026).

The CPP process, information from the Community Development Department, and feedback from Fitchburg's Consolidated Plan Advisory Committee created the following priorities, reiterated in sections SP-05, SP-25, and the PY48 AP-20. The priorities listed are done so with the understanding that the ability to meet each is affected by decreasing HOME and CDBG funds allocated to the Consortium.

The City is confident it will maintain its past performance record while exploring new CDBG opportunities. This will include regular monitoring of CDBG and HOME subrecipients, quarterly accomplishment and financial reporting, and invoice tracking. The City will collect the necessary information from subrecipients and departments and enter it into HUD's eCon Planning Suite via the Integrated Disbursement and Information System (IDIS). Data entered into IDIS is measured against Consolidated Plan goals established during a project/activity's set up. During an eligible activity's initial setup, the CDBG application includes questions confirming the applicant's ability to meet performance benchmarks and the proposed outcomes/impacts of the funding.

### **CDBG Priorities:**

- **Public Services.** The City of Fitchburg will continue to commit available CDBG funds to assist the community by providing new mental health, substance abuse, homelessness prevention, and youth services. Although there is a 15 percent cap on the amount allocated to public services

per year, Fitchburg recognizes the need for social service programs that address the root causes of poverty and homelessness and programs that offer various interconnected services. The City, upon the recommendation of the Consolidated Plan Advisory Committee, will also prioritize public service programs that complement existing projects/activities in both cities. Youth programs for students in elementary and middle school and teens must focus on the multiplier effect, prioritizing capacity, and what is needed to keep children engaged and empowered.

- **Economic Development.** Fitchburg will prioritize economic development efforts that invest in human intellectual capital, grow the workforce's skillsets, and provide resources to business owners to improve operations. The CDBG program must leverage available funds to reach as many businesses as possible in the target area. Upon consultation with the Advisory Committee, the most effective way is to continue the Revolving Loan Fund, utilize existing regulatory expertise, and invest in technical assistance activities over exterior upgrades. Investment in technical assistance will "stretch" available dollars by helping business owners and entrepreneurs develop viable business plans that then secure the funding sources needed to revitalize storefronts and create the tax base to sustain street beautification and improvement efforts.
- **PY48 CDBG Priorities.** The City of Fitchburg understands overcoming hardships presented by the COVID-19 pandemic will be ongoing throughout PY48. Eligible activities such as the Microenterprise Business Grant Program and technical assistance will be prioritized in the first year of this Consolidated Plan. Businesses are beginning to recover and reopen, and the City wishes to build on that momentum. Fitchburg will do this by capitalizing on their existing recovery programs and the pre-pandemic investments, such as the Small Business Loan Program and the Economic Development Incentive Program (EDIP).

#### **HOME Priorities:**

- **Rehabilitation and/or Acquisition of Owner-Occupied and Rental Opportunities.** The Consortium will continue to commit available CDBG and HOME funds to assist LMI families through this activity. Reductions in federal funding have resulted in rehabilitation focused on strategic investments: to increase accessibility; exterior improvements; lead paint abatement; and urgent repairs. These priorities are intended to promote and stabilize LMI neighborhoods, primarily renter-occupied, by addressing physical defects, cost burden, and overcrowding. Annual goals are based on projects ready for funding in the upcoming program year. Additionally, there is a continuing need for lead-free housing that is accessible, safe, and affordable. The majority of the Consortium's housing stock in the geographic priority areas was built before 1978, indicating an increased likelihood of lead.
- **Acquisition, Development, and Rehabilitation by Non-profit Housing Providers to Create Long-Term Affordable Housing.** The Consortium will continue to work with nonprofit housing providers and the CHDO to acquire and rehabilitate substandard housing and develop new, accessible housing to create long-term opportunities for low, very low, and extremely low-income households. The basis for this priority is to grow and diversify the existing housing stock

to offer more affordable, code-compliant housing that is ready for occupancy, free from hazards, and offers support services for eligible populations most in need.

- PY48 HOME Priorities: The Consortium understands that recovering from hardships from the COVID-19 pandemic will be ongoing throughout PY48. Eligible, impactful HOME activities such as increasing housing production for the homeless and utility assistance will likely have a higher priority in the first year of this Consolidated Plan.



## The Process

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	FITCHBURG	Community Development Department
HOME Administrator	FITCHBURG	Community Development Department

Table 1 – Responsible Agencies

### Narrative

The Five-Year Consolidated Plan describes how the Fitchburg-Leominster HOME Consortium, and the City of Fitchburg will use CDBG and HOME funding over the next five years. HUD will provide these annually between 2022 and 2026, contingent upon submitting an Annual Action Plan (AAP) for each Program Year (PY). The 2022-2026 Consolidated Plan includes the PY2022 AAP, also known as Program Year 48, which outlines how the City will use its CDBG allocation of approximately \$929,220 and its HOME allocation of approximately \$545,493 per year. Figure PR-05.1 outlines Fitchburg's CDBG and HOME awards over the past ten years. Due to the challenges presented by COVID-19, the federal government also granted \$1,738,722 in HOME American Rescue Plan (ARP) funds to the Consortium in 2021.

The Community Development and Planning Department (CDP) is responsible for administering the CDBG program and the HOME program for the Consortium. The City will oversee AAP submissions, eligible projects and activities, and how subrecipients will further community development. The CDP includes the Economic Development Division, the Planning Division, and the Housing and Development Division. This arrangement streamlines the grant administration and compliance, as each Division oversees citywide initiatives that leverage CDBG and HOME funding. The CDP directed the development of this Consolidated Plan with assistance from Barrett Planning Group LLC.

Coordination with the CDP for this Consolidated Plan was supplemented by coordination with other departments, including the Department of Public Works (DPW), Parks and Recreation, and the Police and Fire Departments. The consultation process also included nonprofit agencies, housing and service providers, private entities, and the general public.

[See Appendix for Figure PR-05.1]

**Consolidated Plan Public Contact Information**

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## **PR-10 Consultation - 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)**

### **1. Introduction**

The Community Development Department and Barrett Planning Group conducted outreach for this Plan as part of the Citizen Participation Process. Consultation included a formal hearing with the Consolidated Plan Advisory Committee (CPAC), several public meetings, two community needs surveys, a service agency survey, a shelter survey, and focus group discussions with local/regional community development and housing professionals. The process began in February 2021 when the Community Development Department asked other City staff, nonprofits, businesses, and relevant stakeholders to participate in focus groups. The focus groups, surveys, and public hearings garnered responses from the public, staff, board/commission members, and advocates for homeless and non-homeless special need populations throughout spring 2021. The Appendix contains the survey results and a copy of the focus group questionnaire. Outreach also involved phone conversations and virtual meetings with the Consolidated Plans consultants focusing on coordination, scheduling, and logistics such as legal advertisements, translation services, and data-sharing. Two advertised public hearings on the draft and final Plan completed public consultation. The process provided critical information for the Needs Assessment, Market Analysis, and Strategic Plan.

Throughout the Plans development, the City solicited written and verbal comments on community development and housing needs from organizations representing LMI populations in the target area and organizations representing minorities, the ESL population, disabled persons, elderly persons, and other underrepresented groups. The CDP posted advertisements in local print media of all outreach pertaining to this Plan. Information was posted on the City's webpage, social media sites, bulletin boards, and the Newsletter. Lastly, information was emailed to specific staff, providers, and community development/housing list serves. The draft Plan was posted on the City's web page throughout the 30-day comment period.

### **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 Consortium will utilize strategies to enhance coordination between public assisted housing providers, private, governmental health, mental health, and service agencies. The cities will:

- Host annual meetings during AAP development, consisting of information-sharing and input on needs and programs
- Visit agencies for monitoring , assessing if programs are expending CDBG funds in a timely manner and following requirements
- Serve as the clearinghouse and the point of contact

Both cities have needs verified by the Needs Surveys and focus groups. Service agencies reported that affordable housing and service access are top needs among LMI and ESL populations. The CDP works with providers, staff, etc. to forward community development.

The Spanish American Center has a Family Advocate and Referral Specialist providing information, referral, advocacy, and case management for housing, employment, etc. They partner with organizations that bridge gaps including Central MA Area on Aging and the Greater Worcester Community Foundation. They have received CARES Act funding from Fitchburg.

The Community Health Network of North Central Massachusetts (CHNA 9) improves health through local collaboration. It is a partnership between DPH, the Central MA Center for Healthy Communities, hospitals, agencies, etc. to address health needs and improve scope of services. They are a repository for health resources. Several other organizations have been long-standing partners and are funded by CDBG.

MOC is an anti-poverty organization delivering a services including childcare, education, workforce development, housing support, etc. MOC Family Resource Center offers housing, medical, and mental health services, regarding depression, anxiety, etc. MOC works with other partners on programs and offers homeless transition; housing repair/replacement; the CARE AIDS program; lead safety; Child Care and Head Start; and elder food and information access. LUK, Inc. offers programs addressing mental/behavioral health, addiction, and homelessness. LUK focuses on youth development, trauma response, and street outreach. Their stabilization helps youth with transition, stabilization, case management, and crisis/behavior management.

The Arc of Opportunity offers education, employment, and residential/recreational services. Their Home Support program assists those with injuries, disabilities, and seniors. They coordinate via their in-home program, adult family care program, shared living program, community homes, DESE/DDS, and their Agency with Choice programs.

Fitchburg works with public housing, agencies, and health providers to improve quality of life. Nonprofits maximize resources and expand where they can. The Community Development Coordinator meets with partners, provides technical assistance, and stays updated on resources to assist LMI populations. They work with boards, the Mayor, and the City Council to achieve goals. The Health Department, Police, Fire, Community Development Department, and more work together on issues throughout the City. Police, Fire, Board of Health, and Building and Zoning oversee complaints, safety, code violations, and abandoned properties. There is a Problem Property Task Force Meeting to address these issues.

Many affordable housing projects are owned/operated by nonprofits to assist residents. They are connected and are members of committees and joint task forces. FHA partners with the MOC on heating and weatherization programs, and offers health/wellness programs and opportunities to socialize. The Daniel Heights Tenant Association work with the community on multiple initiatives.

**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**

Fitchburg/Leominster are in the Worcester CoC. They work with DHCD, HUD, and others to end homelessness. CMHA is the CoC lead and employs their own processes to address homeless needs. The CoC award is around \$7,386,733.

The CMHA coordinates in the CoC framework, improving service delivery. With partner collaboration, staff coordinate services to those transitioning out of homelessness, needs assessments and programs. Cities do not receive federal homeless funds. The CoC has a CES accessible by visiting in-person, online, or calling CMHA. The CES measures vulnerabilities and barriers. Its assessment tool covers the CoC area, reaching those unlikely to apply for assistance.

Using the HMIS, CoC communities collect PIT count data. The PIT documents sheltered/unsheltered people on one night. HUD requires CoCs to document homeless in shelters, transitional housing, and safe haven, and the data identifies gaps. Providers contributing to the PIT usually receive CoC funding.

MA mandates discharge policies for youth, patients exiting care facilities, and people exiting corrections system. DCF, DMH, EOHHS, DMH, and the Interagency Council on Housing and Homelessness collaborate on this. CoCs share updates from these agencies. The CoC ensure those discharged are not going into a homeless situation. Services agencies, PHAs, and city officials attend meetings at CMHA. These meetings coordinate efforts, including:

- PHAs providing a homeless preference per state regs. They get an Emergency Application and move to the front of the waiting list if approved.
- Fitchburg supports the Leighton Street Program through NewVue Communities, Inc. who provide funding for PSH to adults in recovery.
- Fitchburg supports L.U.K Crisis Centers Young Adult Rapid Rehousing Program CoC application.

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

While the Consortium does not directly receive ESG funds, the Worcester City and County CoC does. The CoCs Planning and Review Committee determines priority needs and funding awards for ESG programs. State and local governments, private and non-profit agencies, affordable housing developers, law enforcement, and veteran providers comprise the Committee. It works with the state to determine the most effective use of funds regionally.

The CoC submits priorities for ESG funding to the Department of Housing and Community Development (DHCD). DHCD collaborates with CoCs to determine how funds will be allocated across the state, particularly regarding emergency shelter, shelter diversion, and Rapid Re-Housing funds. Meetings, led by DHCD, typically review performance data, programs, and improvement areas. Performance measures include the volume of permanent housing, job, and income growth, and thorough outreach. HMIS data from ESG-funded agencies evaluate performance and determine funding distribution.

The CoC incorporates state forms to ensure compliance with HUDs monitoring regulations. The CoC agrees to integrate HMIS data for participant-approved information sharing across jurisdictions. The Worcester City and County CoC has an HMIS Policies and Procedures Manual that it abides by for compliance purposes.

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

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	NewVue Communities, Inc.
	<b>Agency/Group/Organization Type</b>	Housing Services-Employment Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Strategic Plan
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into annual planning/allocation process. Community Development staff consulted with NewVue in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department also consulted with NewVue via a survey and various public hearings.
2	<b>Agency/Group/Organization</b>	YWCA of Central Massachusetts
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Victims of Domestic Violence Services-homeless Services-Health Services - Narrowing the Digital Divide
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Strategic Plan
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into annual planning/allocation process. Community Development staff consulted with the YMCA in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department also consulted with YMCA via a survey and various public hearings. Staff also responded to questions regarding narrowing the digital divide and broadband access as part of focus group discussions.

3	<b>Agency/Group/Organization</b>	South Middlesex Opportunity Council, Inc.
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Service-Fair Housing Economic Development
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Market Analysis Strategic Plan
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Requested data for people served in programs. Input to be incorporated into annual planning/allocation process.
4	<b>Agency/Group/Organization</b>	Fitchburg Veteran Services Office
	<b>Agency/Group/Organization Type</b>	Services - Narrowing the Digital Divide Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Needs - Veterans Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Requested data for people served in programs. Input to be incorporated into annual planning/allocation process. Staff also responded to questions regarding narrowing the digital divide and broadband access as part of focus group discussions.
5	<b>Agency/Group/Organization</b>	Fitchburg City Departments
	<b>Agency/Group/Organization Type</b>	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Other government - Local Hazard Mitigation



	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis Strategic Plan
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Ongoing discussions and consultation with City staff and departments throughout the Consolidated Planning process. Coordination on outreach, advertising, data sharing, and finalization of the plan. Informed each aspect of the Con Plan and the AAP. The Police Chief, Board of Health Director and Health Department, Veterans' Services, Treasurer, Mayors Office, Economic Development Director, Building Commissioner, Community Development Director, Assistant City Solicitor, Director of Recreation, and the Director of Public Works responded to questions regarding hazard mitigation, management of flood prone areas, public land or water resources, emergency management, and narrowing the digital divide as part of focus group discussions. The Economic Development Director discussed recent strides taken to improve internet access for LMI residents and business owners, and how the City is improving digital literacy. Consultants also used data published by the Open Space and Hazard Mitigation to inform the Hazard Mitigation section of the Con Plan and for detailed information regarding the management of flood prone areas, public land or water resources and emergency management agencies.
6	<b>Agency/Group/Organization</b>	Leominster City Departments
	<b>Agency/Group/Organization Type</b>	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Other government - Local Hazard Mitigation
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis Strategic Plan

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Ongoing discussions and consultation with City staff and departments throughout the Consolidated Planning process. Coordination on outreach, advertising, data-sharing, and finalization of the plan. Informed each aspect of the Con Plan and the AAP. City staff including the Economic Development Director, the DPS's Senior Engineering Aide, and the Small Business Development Coordinator responded to questions regarding hazard mitigation, management of flood prone areas, public land or water resources, emergency management, and narrowing the digital divide as part of focus group discussions. Consultants also used data published by the Open Space and Hazard Mitigation to inform the Hazard Mitigation section of the Con Plan and for detailed information regarding the management of flood prone areas, public land or water resources and emergency management agencies.
7	<b>Agency/Group/Organization</b>	Community Health Connections
	<b>Agency/Group/Organization Type</b>	Services-homeless Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Requested data for people served in programs. Input to be incorporated into annual planning/allocation process.
8	<b>Agency/Group/Organization</b>	LUK Crisis Center, Inc.
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-homeless Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into annual planning/allocation process. Community Development staff consulted with LUK in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department also consulted with LUK via a survey and various public hearings..
9	<b>Agency/Group/Organization</b>	Community Needs Assessment Survey Fitchburg and Leominster
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Housing Community Development
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Community needs survey was sent via email and posted on webpages in both cities. Mailer surveys were available upon request. The Fitchburg survey was translated into Spanish. Specific surveys were sent to service providers and shelters. Input to be incorporated into annual planning/allocation process.
10	<b>Agency/Group/Organization</b>	Department of Mental Health
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Elderly Persons Services-Persons with Disabilities Other government - State
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Requested data for people served in the Consortium. Input to be incorporated into annual planning/allocation process
11	<b>Agency/Group/Organization</b>	Massachusetts Department of Developmental Services
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Requested data for people served in the Consortium. Input to be incorporated into annual planning/allocation process
12	<b>Agency/Group/Organization</b>	Massachusetts Commission for the Blind
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Requested data for people served in the Consortium. Input to be incorporated into annual planning/allocation process.
13	<b>Agency/Group/Organization</b>	Jeffrey's House
	<b>Agency/Group/Organization Type</b>	Services - Housing Substance Abuse
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Market Analysis Strategic Plan
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Requested data for people served in programs. Input to be incorporated into annual planning/allocation process
14	<b>Agency/Group/Organization</b>	Our Father's House, Inc.
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-homeless Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Economic Development Market Analysis

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into annual planning/allocation process. Community Development staff consulted with Our Father's House in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department also consulted with Our Father's House via a survey and various public hearings.
15	<b>Agency/Group/Organization</b>	My Turn, Inc.
	<b>Agency/Group/Organization Type</b>	Services-Children Business and Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Requested data for people served in the Consortium. Input to be incorporated into annual planning/allocation process
16	<b>Agency/Group/Organization</b>	WORK, Inc.
	<b>Agency/Group/Organization Type</b>	Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Requested data for people served in programs. Input to be incorporated into annual planning/allocation process.
17	<b>Agency/Group/Organization</b>	Mass Department of Public Health
	<b>Agency/Group/Organization Type</b>	Services-Health Other government - State
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Data collected from state webpage on alcohol & drug addiction, and AIDS and related diseases. Input to be incorporated into annual planning/allocation process.
18	<b>Agency/Group/Organization</b>	Veterans Hospice Homestead
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Elderly Persons Services-homeless Services-Health Veterans
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Needs - Veterans Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Requested data for people served in programs. Input to be incorporated into annual planning/allocation process.
19	<b>Agency/Group/Organization</b>	LEOMINSTER HOUSING AUTHORITY
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into annual planning/allocation process. Community Development staff consulted with LHA in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department also consulted with LHA via a survey and various public hearings
20	<b>Agency/Group/Organization</b>	Fitchburg Housing Authority
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Market Analysis

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into annual planning/allocation process. Community Development staff consulted with LHA in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department also consulted with LHA via a survey and various public hearings.
21	<b>Agency/Group/Organization</b>	North Star Family Services, Inc.
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-homeless Services - Narrowing the Digital Divide Child Welfare Agency
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Market Analysis Anti-poverty Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into annual planning/allocation process. Community Development staff consulted with NSFS in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department also consulted with NSFS via a survey and various public hearings. Staff also responded to questions regarding narrowing the digital divide and broadband access as part of focus group discussions.
22	<b>Agency/Group/Organization</b>	Joint Coalition on Health of North Central Mass.
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Report obtained on Community Health Needs Assessment in North Central Mass. Input to be incorporated into annual planning/allocation process.
23	<b>Agency/Group/Organization</b>	Catholic Charities of Worcester County
	<b>Agency/Group/Organization Type</b>	Services-homeless Services - Narrowing the Digital Divide Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into annual planning/allocation process. Community Development staff consulted with CCWC in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department also consulted with CCWC via a survey and various public hearings. Staff also responded to questions regarding narrowing the digital divide and broadband access as part of focus group discussions.
24	<b>Agency/Group/Organization</b>	Growing Places
	<b>Agency/Group/Organization Type</b>	Services-Health Services-Education Services - Narrowing the Digital Divide
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Market Analysis



	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into annual planning/allocation process. Community Development staff consulted with Growing Places in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department also consulted with Growing Places via a survey and various public hearings. Staff also responded to questions regarding narrowing the digital divide and broadband access as part of focus group discussions.
25	<b>Agency/Group/Organization</b>	North Central MA Habitat for Humanity
	<b>Agency/Group/Organization Type</b>	Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into annual planning/allocation process. Community Development staff consulted with NCMHH in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department also consulted with NCMHH via a survey and various public hearings.
26	<b>Agency/Group/Organization</b>	United Way of North Central MA
	<b>Agency/Group/Organization Type</b>	Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into annual planning/allocation process. Community Development staff consulted with UWNCM in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department also consulted with UWNCM via a survey and various public hearings.
27	<b>Agency/Group/Organization</b>	Consolidated Plan Advisory Committee
	<b>Agency/Group/Organization Type</b>	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Business and Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Market Analysis Anti-poverty Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The cities of Fitchburg and Leominster consulted the Committee via focus groups, surveys, and in public meetings. The Committee contained professionals in housing, social services, economic development, infrastructure, services and facilities. The information exchanged confirmed the need for the CDBG and HOME programs and validated the program's priorities. The group offered suggestions for improvement and discussed pressing issues regarding internet/broadband access and economic development, as well as green initiatives, sustainability, and resilience.
28	<b>Agency/Group/Organization</b>	Spanish American Center
	<b>Agency/Group/Organization Type</b>	Housing Services-Children Services-Victims of Domestic Violence Services-Education Services-Employment Child Welfare Agency Regional organization

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Strategic Plan
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into annual planning/allocation process. Community Development staff consulted with SAC in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department also consulted with SAC via a survey and various public hearings.
29	<b>Agency/Group/Organization</b>	Making Opportunity Count
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Employment Service-Fair Housing Services - Victims Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Strategic Plan
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into annual planning/allocation process. Community Development staff consulted with MOC in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department also consulted with MOC via a survey and various public hearings.

30	<b>Agency/Group/Organization</b>	The Arc of Opportunity
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Persons with Disabilities Services-Health Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Strategic Plan
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into annual planning/allocation process. Community Development staff consulted with Arc in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department also consulted with Arc via a survey and various public hearings.
31	<b>Agency/Group/Organization</b>	Centro Las Americas
	<b>Agency/Group/Organization Type</b>	Services-Health Services-Education Services-Employment Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Regional organization Business Leaders Economic Development
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Strategic Plan

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into annual planning/allocation process. Community Development staff consulted with CENTRO in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department also consulted with CENTRO via a survey and various public hearings. Staff also responded to questions regarding narrowing the digital divide and broadband access as part of focus group discussions.
32	<b>Agency/Group/Organization</b>	Fitchburg Redevelopment Authority
	<b>Agency/Group/Organization Type</b>	Services-Employment Regional organization Planning organization Business and Civic Leaders Economic Development
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Economic Development Market Analysis Strategic Plan
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into annual planning/allocation process. Community Development staff consulted with FRA in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department also consulted with FRA via a survey and various public hearings.
33	<b>Agency/Group/Organization</b>	Fitchburg Public Schools
	<b>Agency/Group/Organization Type</b>	Services-Children Publicly Funded Institution/System of Care Regional organization Schools

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Families with children Non-Homeless Special Needs Market Analysis Strategic Plan
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into annual planning/allocation process. Community Development staff consulted with FPS in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department also consulted with FPS via a survey and various public hearings.
34	<b>Agency/Group/Organization</b>	Fitchburg State University
	<b>Agency/Group/Organization Type</b>	Services-Education Services - Narrowing the Digital Divide State University Major Employer
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Economic Development Market Analysis Strategic Plan

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into annual planning/allocation process. Community Development staff consulted with FSU in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department also consulted with FSU via a survey and various public hearings. A representative from Fitchburg State University sat on the Advisory Committee and discussed the importance of internet access, narrowing the digital divide, and their correction with economic development and supporting low and moderate-income households. This representative also discussed Fitchburg State Idealab and how it is bridging the digital divide for student, faculty and the greater community.
35	<b>Agency/Group/Organization</b>	North Central MA Chamber of Commerce
	<b>Agency/Group/Organization Type</b>	Services-Employment Services - Narrowing the Digital Divide Business and Civic Leaders Chamber of Commerce
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Economic Development Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into annual planning/allocation process. Community Development staff consulted with the Chamber via a survey and various public hearings. A representative from the Chamber sat on the Advisory Committee and discussed the importance of internet access, narrowing the digital divide, and their correction with economic development and supporting low and moderate-income business owners. This representative also discussed technology and language barriers, and recommendations to overcome common challenges in both communities.

36	<b>Agency/Group/Organization</b>	Montachusett Regional Planning Commission
	<b>Agency/Group/Organization Type</b>	Housing Planning organization Hazard Mitigation
	<b>What section of the Plan was addressed by Consultation?</b>	Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into annual planning/allocation process. Staff also used data published by the Commission to inform the Hazard Mitigation section of the Con Plan and for detailed information regarding the management of flood prone areas, public land or water resources and emergency management agencies.
37	<b>Agency/Group/Organization</b>	North Central MA Workforce Investment Board/MassHire
	<b>Agency/Group/Organization Type</b>	Services-Employment Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Other government - State
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into annual planning/allocation process. Staff also used data published by the Board to inform the Broadband section of the Con Plan and for detailed information regarding internet service providers and/or organizations engaged in narrowing the digital divide.

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

The City did not exclude any agencies interested in the Five-Year Consolidated Plan during the consultation process.



## 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	Continuum of Care Central Massachusetts, CMHA	Goal to end homelessness through the provision of shelter and housing opportunities.
Impact of Housing Issues on Residents	Fitchburg Housing Coalition	Complements the Consolidated Plan in efforts to address homelessness and provide affordable housing.
Rail Trail	Twin City Rail Trail Association	Complements the Consolidated Plan by creating and providing access to recreational opportunities.
Econ Deve Strategic Plan and Trends Report	City of Fitchburg	Job creation, workforce training, and economic development goals and strategies established for the city of Fitchburg.
Vision 2020 Comprehensive Master Plan	City of Fitchburg	Policy initiatives, recommendations, and goals for housing, land use, economic development, public facilities, services, and infrastructure.
Land Development Guide	City of Fitchburg	Policies, recommendations, and goals for land use, economic development, services, infrastructure, and responsible development practices.
Open Space and Recreation Plan Update	City of Fitchburg	Identification of active and passive recreation and open space improvements, which overlaps with health services, public safety, and non-housing community development needs.
Fitchburg State University Strategic Plan	Fitchburg State University	Complements the Consolidated Plan by combining efforts on the part of the City and the University to grow the local economy and the quality of life for the FSU student body and the community at-large.
Downtown Urban Revitalization and Development Plan	City of Fitchburg	Job creation, workforce training, and economic development recommendations for Downtown Fitchburg. Identifies revitalization opportunities within the target area, which has an LMI majority. Housing and non-housing needs, land use, community development, and economic development goals established.
Complete Streets Executive Order	City of Fitchburg	Creates goals to assist the local economy and businesses. Goals include promoting job creation, walkability, and citywide vitality through alternative transit. Offers alternative transportation options and future recommendations.

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Consortium Con Plan (2020) and PY42 AAP	Fitchburg-Leominster Consortium	Goals for housing/homelessness needs, non-housing needs, and non-housing community development needs. Point of reference to understand changes in provision of services and programs. The plan also contains data to use for understanding trends.
Mass Growth Capital Corporation Initiative	City of Leominster	State program the City utilizes to forward several economic development, public facilities and infrastructure goals shared within the Strategic Plan.
Comb & Carriage/French Hill Gateway Action Plan	City of Leominster	Informed data-driven recommendations for Comb & Carriage/French Hill target area. Assess problems and offered solutions that overlap with Consolidated Planning efforts and goals.
Leominster Guide to Growing Greener	City of Leominster	A study of a comprehensive ways to advance greener growth and cleaner water in the City. The study combines natural, recreational, cultural, and community resources to achieve sustainability and conservation goals. Goals align with housing and non-housing community development needs.
Gateway Cities Economic Sev Incentive Program	City of Leominster	State program the City utilizes to forward economic development goals shared in the Strategic Plan, based on needs in the Consolidated Plans findings.
Leominster Housing Development Incentive Program	City of Leominster	State program the City utilizes to forward housing goals shared in the Strategic Plan, based on needs in the Consolidated Plans findings.

**Table 3 – Other local / regional / federal planning efforts**

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

Public and private entities in the Consortium meet to discuss issues and concerns. Fitchburg and Leominster work together on housing investments and strategies concerning the HOME program as Consortium members. Both cities are members of the Central Massachusetts Housing Alliance, which includes financial institutions, nonprofits, and government partners working together on community development and housing initiatives. Members work closely with credit and banking institutions on affordable housing for their LMI residents.

As the Consortium lead, Fitchburg is largely involved with the Worcester CoC. The CoC represents organizations across the county dedicated to helping the homeless, chronically homeless, and those at risk of homelessness. The CMHA receives HUD funds and coordinates services within the CoC framework, helping improve service delivery and equitable distribution to areas of demonstrated need.

The CDP actively consults with its CoC partners, boards and commissions, and providers to leverage resources.

Fitchburg has prior year resources, program income, Entitlement funds for CDBG activities, and additional CARES Act funding. The City will receive an anticipated \$4,646,100 between 2022 and 2026. These funds will be used for public services, economic development, housing, and infrastructure/facilities, furthering the goals in the Strategic Plan. Public services will receive approximately \$696,915 in funding over the next five years, per HUD's 15 percent cap. Administration will receive an anticipated \$929,220 per HUD's 20 percent cap over the next five years. The HOME Consortium has received \$545,493.

The cities consider projects that leverage multiple funding sources and serve high priority needs during the RFP process. From 2022 to 2026, both cities anticipate receiving additional federal, state, and local resources to leverage their CDBG and HOME efforts.

## **Narrative**

Consolidated Plans require the participation of various organizations to determine needs and opportunities for CDBG and HOME funding. This Plan attempted to include as many community entities as possible to achieve this goal. The process also involved linking past, present, and future planning; commissioned studies containing housing, economic, and related assessments largely informed the Needs Assessment and Market Analysis. These plans are outlined in detail in Table 3.

The Consortium and the City of Fitchburg seek out match opportunities, as the current allocations are not enough to cover the costs of larger projects/activities. As an Entitlement Grantee, Fitchburg must adhere to specific performance measures and timely expenditure of funds established by HUD. Partner roles and responsibilities must be clear, or beneficiaries can be adversely affected. If not managed, backlogs can have compounding effects and divert attention from other projects. Because of this, the City maintains a strong, transparent relationship with partners to revitalize the City for its LMI residents.

## **PR-15 Citizen Participation - 91.105, 91.115, 91.200(c) and 91.300(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

The CPP was updated as part of the 2022-2026 Con Plan. Outreach consisted of 4 all-day focus groups (March 1-March 4, 2021), 2 Advisory Committee meetings (Spring 2021), 2 online Needs Surveys (March 9-March 24, 2021), an online agency survey, an online shelter survey (March 9-March 24, 2021), 2 public hearings (February 28 and April 26, 2022) and a 30-day comment period. Survey copies were available until April 2, 2021. Fitchburg translated its survey into Spanish. No paper responses were received in Fitchburg, Leominster received nine.

The City created flyers and social media templates, circulated widely. The hearings were hosted via Zoom to gather feedback. Newspaper ads provided notice of the hearings. The notice soliciting comments was published in February 2022. The City website posted all notices. Table 4 outlines comments at meetings and during the comment period. Information gathered during consultation is in PR-10. The process was consistent with the approved CPP. The City solicited comments from organizations representing LMI populations, minorities, elected officials, previous applicants, and the public.

The CDP administered the Needs Survey on housing, social services, facilities/infrastructure, and economic priorities. Respondents rated need for each category, answered demographic questions, and questions about housing discrimination. Respondents could complete the survey online via a link or QR code. There were 132 responses: 115 for Fitchburg and 26 for Leominster. There were 2 shelter survey responses and 18 for the agency survey. Focus groups discussed needs, priorities, and recommendations. There were 4 days of focus groups in March, with roughly 30 agencies and departments. There were 9 for Fitchburg and 6 for Leominster. One individual could not participate and submitted electronic responses.

The comment period remained open until from March 1 - March 30, 2022. The City posted a link to the Plan on the website and hard copies available upon request. The City worked with the community to encourage participation of minorities, PHA tenants, and people with disabilities. Fitchburg provides translation and can have translators available upon request. Information on translations services and notices in other languages is available on their website.

### 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)
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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	Focus Groups	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p>	<p>15 focus group sessions were held between March 1 and March 4, 2021, via Zoom, with 2 days dedicated to each City. The meetings were on: housing (9 total attendees), social services (11 attendees), economic development (9 attendees), facilities and services (4 attendees), health services (2 attendees), and City staff (12 attendees). Barrett Planning Group conducted the meetings. They explained the Plan and asked attendees about their needs, priorities, and recommendations.</p>	<p>Attendees provided comments and answered questions about the following: economic development, public facilities/public infrastructure, public services, health services, and housing. Participants made suggestions for improvements, discussed achievements/milestones in their field, described specific trends, highlighted challenges, and addressed priorities for LMI residents. There was one response to the facilities/services</p>	<p>All comments accepted.</p>	<p><a href="https://www.signupgenius.com/">https://www.signupgenius.com/</a></p>

Consolidated Plan

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)
2	Focus Groups	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>141 people completed a Needs Assessment online survey between March 9 and March 24, 2021 - 115 responses for Fitchburg and 26 for Leominster). The survey link and QR code were circulated for widespread distribution by the Community Development Department. Hard copies of the survey were available upon request. There were no written responses to the survey collected from Fitchburg and nine from Leominster.</p> <p>Fitchburg survey was translated into Spanish. Two shelters</p>	<p>Priority needs indicated in housing availability and affordability, mental health and youth services, substance abuse services, facility/park upgrades, public infrastructure and streetscapes, and economic development assistance. Participants were also asked basic demographic questions. The survey was anonymous.</p>	<p>All comments accepted.</p>	<p><a href="https://www.surveymonkey.com/">https://www.surveymonkey.com/</a></p>

Consolidated Plan

FITCHBURG

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)
3	Focus Groups	Non-targeted/broad community	Professionals and major stakeholders from Fitchburg and some regional agencies attended a Consolidated Plan Advisory Committee meeting on March 29, 2021, via Zoom. There were twenty members in attendance. Barrett Planning group discussed the specifics of the Plan, summarized outreach thus far, and posed questions to the group regarding needs. The group then provided feedback on gaps and the community needs from their perspective. FITCHBURG	Attendees provided comments and asked questions about activities related to CDBG and HOME. They asked how the CPP data was gathered and how it will inform the Plan. Attendees made suggestions that included expanding partnerships, focusing on social services and housing, increasing communication, data-sharing, diversifying the Committee, and how the Plan can adequately reflect need.	All comments accepted.	N/A
	Consolidated Plan					40



Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Focus Groups	Non-targeted/broad community	Professionals and major stakeholders from Fitchburg and some regional agencies attended a Consolidated Plan Advisory Committee meeting on April 13, 2021, via Zoom. There roughly fifteen members in attendance. Barrett Planning group discussed the specifics of the Plan, summarized outreach thus far, and posed questions to the group regarding needs. The group then provided feedback on gaps and the community needs from their perspective.	Attendees provided comments and asked questions about activities related to CDBG and HOME. They asked about how the CPP data will inform the Plan. Attendees made suggestions that included prioritizing services for the most vulnerable and housing for extremely LMI, expanding partnerships, focusing on services and housing, increasing communication, how the Plan can adequately reflect need and prioritization.	All comments accepted.	N/A
Consolidated Plan			FITCHBURG	CDBG		41

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)
5	Newspaper Ad	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	This publication has a wide circulation. The 30-day notice for public comment of the draft Consolidated Plan was posted in Spring 2022.	No comments received.	All comments accepted.	N/A

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)
6	Public Hearing	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>Members of the public attended the public hearing on the 2022-2026 Consolidated Plan and Program Year 48 AAP. Community Development staff members were in attendance. The meeting was held virtually on February 28, 2022 via Zoom. Meeting hosts explained the Plan and asked attendees about specific topic needs. The hearing addressed questions about the program.</p>	<p>Attendees provided comments and answered general questions about the following topics: housing, economic development, social services, and public facilities. Participants made suggestions for improvements and additions. One attendee stated that vacant home fronts and technical assistance are critical. Underserved businesses struggle with paperwork, forms, etc. that need to be done. Translation</p>	<p>All comments accepted.</p>	<p>N/A</p>

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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)
7	Public Hearing	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>Members of the public attended the public hearing on the 2022-2026 Consolidated Plan and Program Year 48 AAP. Community Development staff members were in attendance. The meeting was held virtually on April 26, 2022 via Zoom. Meeting hosts explained the Plan and asked attendees about specific topic needs. The hearing addressed questions about the program.</p>	<p>Attendees provided comments and answered general questions about the following topics: housing, economic development, social services, and public facilities. Participants made suggestions for improvements and additions.</p>	<p>All comments accepted.</p>	N/A

**Table 4 – Citizen Participation Outreach**



# Needs Assessment

## NA-05 Overview

### Needs Assessment Overview

The Needs Assessment presents the cities of Fitchburg and Leominster's housing and community development needs through data from public and proprietary sources and interviews with community organizations, residents, and officials. It covers a range of needs in the City, from homelessness to barriers for minorities, people with disabilities, HIV/AIDS patients, domestic violence victims, low to moderate-income (LMI) households, renters, and other homeless and non-homeless special needs populations.

As the HOME Consortium's lead, Fitchburg prepares and submits the Consolidated Plan's Needs Assessment. While the Needs Assessment addresses housing needs, it also emphasizes community development needs. As an Entitlement grantee, Fitchburg establishes funding priorities that must allocate at least 70 percent of CDBG funds to activities for LMI people. The City is committed to

Identifying and implementing programs and strategies that offer the greatest impact with available funding. This section describes cost burden, severe cost burden, overcrowding, and substandard housing conditions that LMI households face. This section also assesses disproportionate need among racial and ethnic groups. A map of census tracts over 51 percent LMI is in Section NA-05.

Affordability and access to safe, secure housing are ongoing issues for the Consortium's most vulnerable populations, particularly Fitchburg. These populations are affected by significant differences between household incomes and housing costs, often living in substandard conditions with limited access to facilities or adequate services, employment, and transportation. During the Citizen Participation Process (CPP), respondents repeatedly stated the need for critical home repair projects in Fitchburg. There is a lack of funding to fix all the repairs to make some properties livable. The rental inventory is in particularly poor condition with recurring code violations.

Comparing housing costs to incomes underscores how expensive the market has become, particularly for renters. The median gross rent is \$1,016 in Fitchburg and \$973 in Leominster; however, the median household income (MHI) for renters is \$39,610 and \$38,611, respectively. According to 2019 ACS estimates, median gross rent in both cities is almost 30 percent of household incomes, excluding utilities and other living expenses. HUD defines cost burden as paying more than 30 percent of income toward housing expenses (rent or mortgage, plus utilities). Most renters in the area are cost-burdened solely from rent payments by this definition. Roughly 39 percent of Fitchburg households and 34 percent of Leominster households are cost-burdened, on par with the state average of 33 percent according to Comprehensive Housing Affordability Strategy (CHAS) data.

[See Appendix for Figure NA-05.1 and Figure NA-05.2]

### **Additional Text**

Forty-six percent of Fitchburg's households and 42% of Leominster's households are renting. Median gross rent is about 1.2% of the median family income based on HUD income limits. It is important to note that median family income includes homeowners who usually have higher incomes than renters. The average median income of a Consortium renter exceeds HUD's income limit for a single person making 50% of the median family income (considered "very low income") by only \$9,000.14 to reach the 80% threshold for a single person, a Consortium renter makes at least \$8,200 more. According to CHAS, 28% of Fitchburg renters and 23% of Leominster renters are severely cost-burdened - paying more than half of their incomes on housing expenses (3,530 total households). The data indicate renters are more likely to disproportionately suffer from a housing problem than owners. Cost burden is the most prevalent housing problem.

Consortium homeowners are not immune to cost burden. The median sales price of a home is \$265,000, considerably higher than the \$196,600 median home value reported by the ACS. Considering HUD's median family income, the median sale price is almost \$50,000 more than an LMI household can afford. The median sales price rose by 92% in Fitchburg and 55% in Leominster since 2010. ACS data shows a Fitchburg homeowner's MHI is \$76,235, and a Leominster homeowner's MHI is \$87,557. When compared to average monthly housing costs of \$1,181 (Fitchburg) and \$1,127 (Leominster), homeowners are paying an additional \$12,000 a year. Most LMI homeowners are barely able to maintain their homes. CHAS shows 4,705 owner occupied households (28%) are cost-burdened, and 1,790 (11%) are severely cost-burdened. Affordability and an aging housing stock that needs investment make both cities difficult for LMI households to live in. A map of MHI for each community is below.

Populations facing the greatest needs are the extremely low-income, minorities, and those classified as "special needs" populations. Extremely low-income households have incomes at or below 30% of the median. About 5,320 extremely low-income households are in Fitchburg and Leominster (17%). These households live at or slightly above the poverty level. They are vulnerable to substandard housing such as overcrowding and poor quality. The elderly and families with young children also experience high need. Minorities experience a disproportionate level of housing need across the Consortium. Minorities comprise 20% of Fitchburg's population (about 8,000 people) and 19% of Leominster's population (about 7,924 people) but have disproportionately higher housing problems.

Non-elderly special needs populations that are homeless/at-risk are also a cause for concern. There are few qualified workers in the service fields to address demands for full-service care and help individuals remain housed. The issue is compounded by the lack of affordable, safe units for those in need of

transitional housing, PSH, SRO, Safe Haven, and accessible apartments. The Needs Survey and focus groups revealed concerns about the rising numbers of mental health and substance abuse in both cities. According to the CMHA North County data (more current than PIT counts), 21 homeless individuals and 55 chronically homeless individuals suffer from substance abuse. Sixteen homeless individuals and 61 chronically homeless individuals suffered from serious mental illness. Improving services will help address the homelessness crisis while shrinking housing waiting lists, as the homelessness are often linked to these issues. Nevertheless, the lack of affordable, available units in decent condition will continue to exacerbate the homelessness crisis unless action is taken.

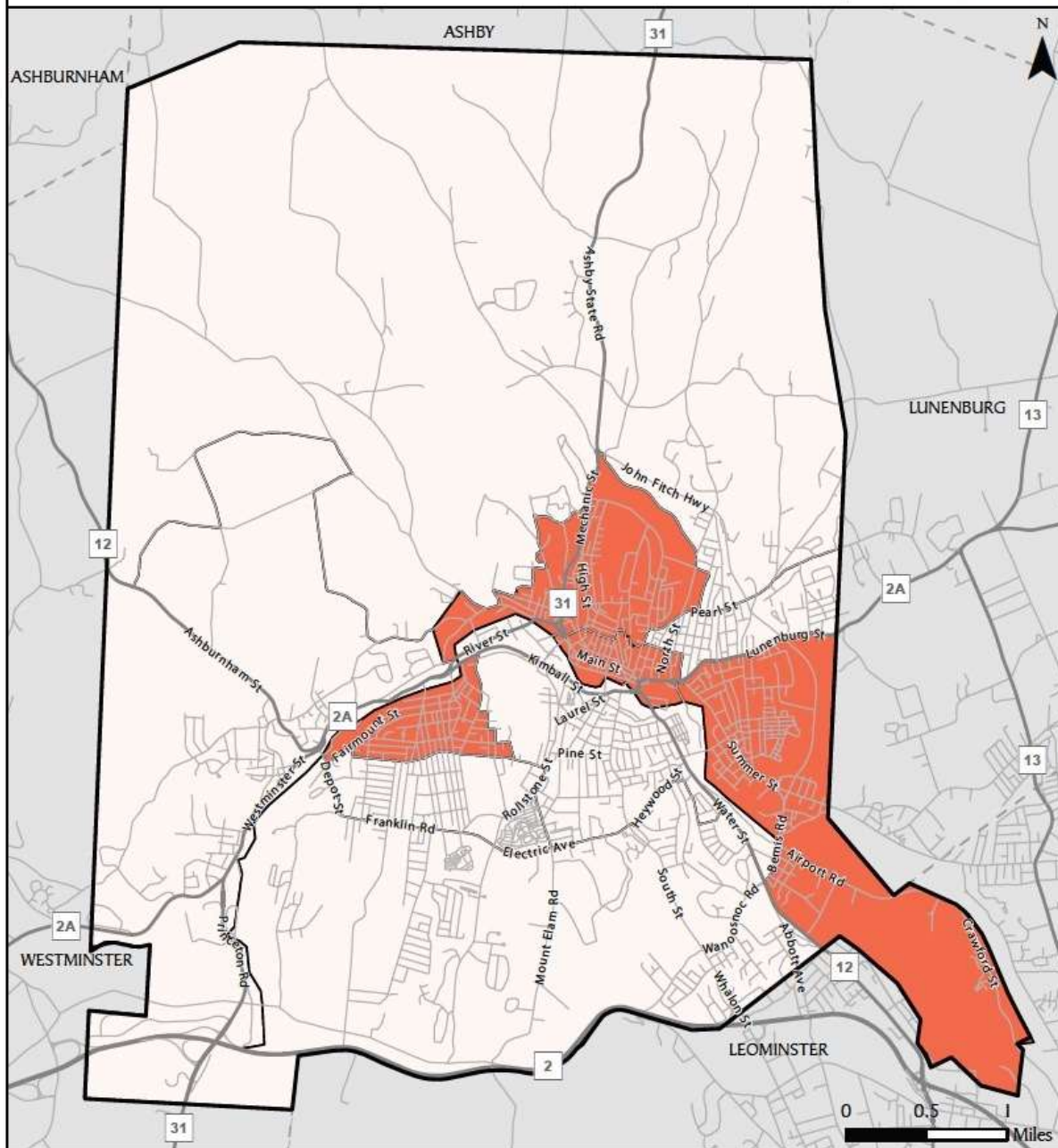


# City of Fitchburg Consolidated Plan

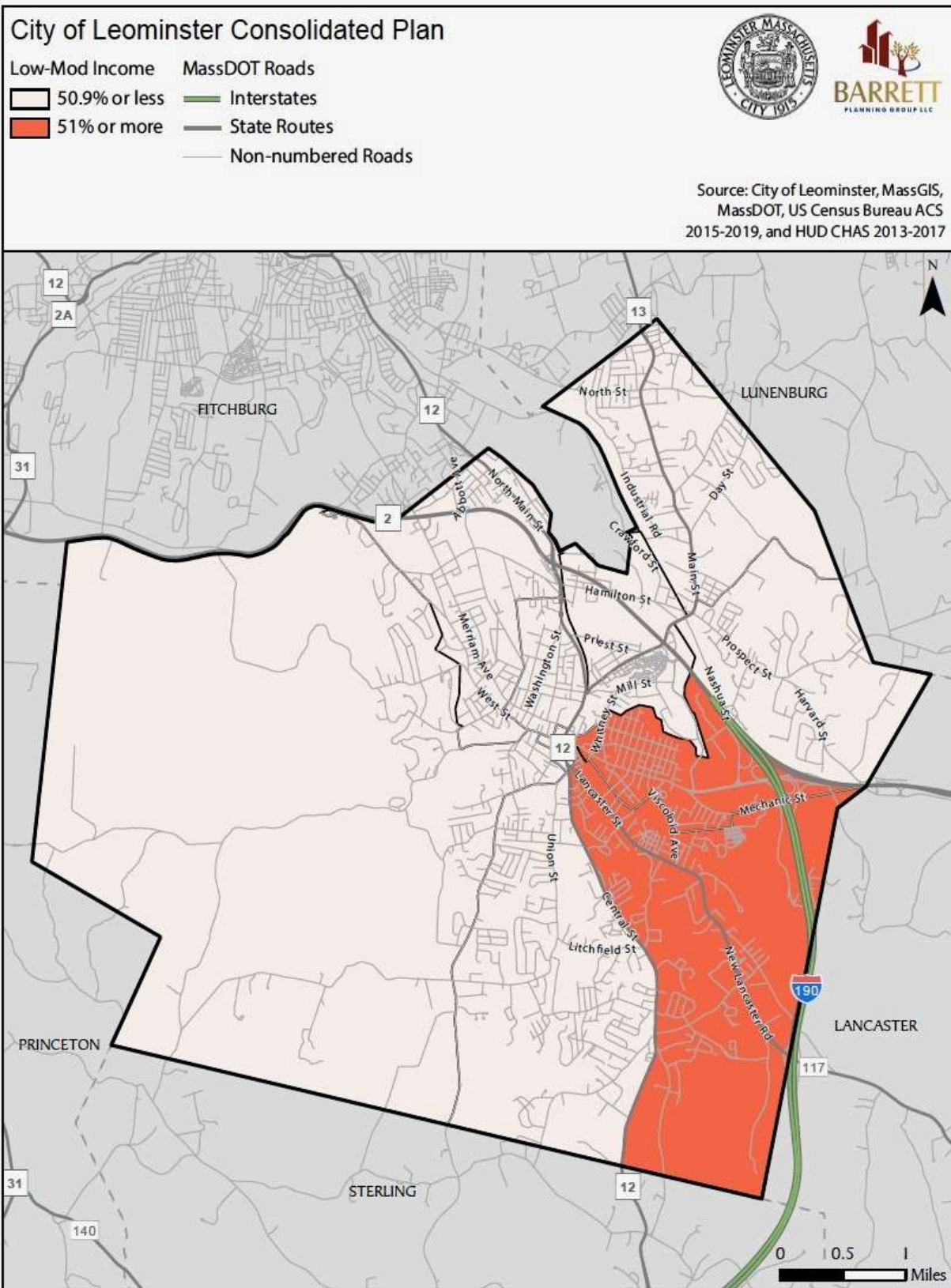
Low-Mod Income    MassDOT Roads  
 50.9% or less    State Routes  
 51% or more    Non-numbered Roads



Source: City of Fitchburg, MassGIS,  
 MassDOT, US Census Bureau ACS  
 2015-2019, and HUD CHAS 2013-2017



Fitchburg LMI Map



**Leominster LMI Map**

Consolidated Plan

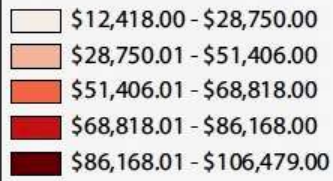
FITCHBURG

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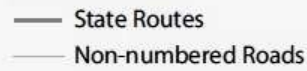


# City of Fitchburg Consolidated Plan

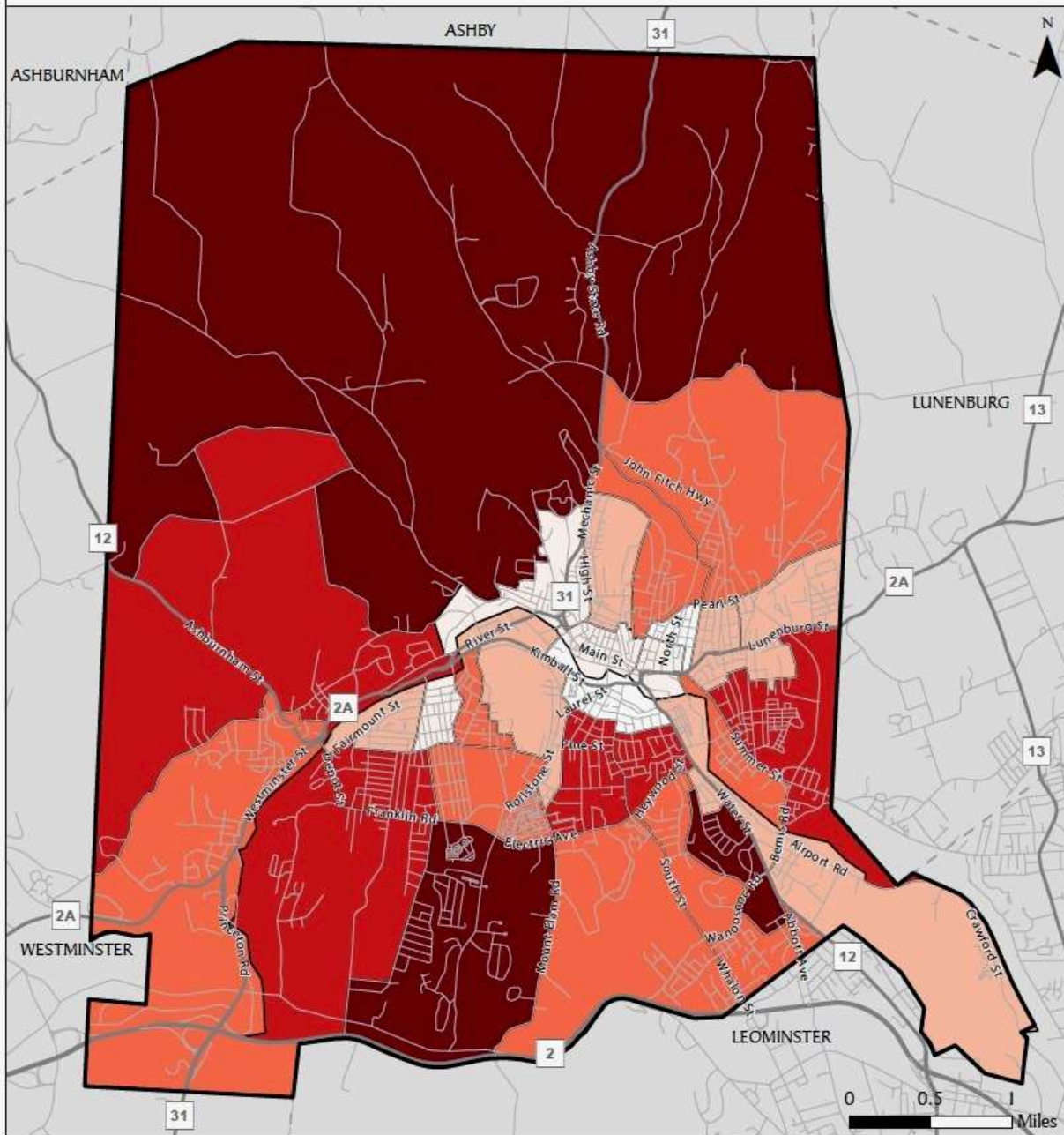
## Median Household Income



## MassDOT Roads



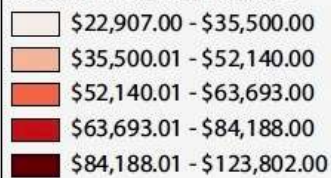
Source: City of Fitchburg, MassGIS,  
MassDOT, US Census Bureau ACS  
2015-2019, and HUD CHAS 2013-2017



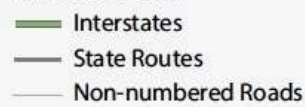
Fitchburg MHI Map

# City of Leominster Consolidated Plan

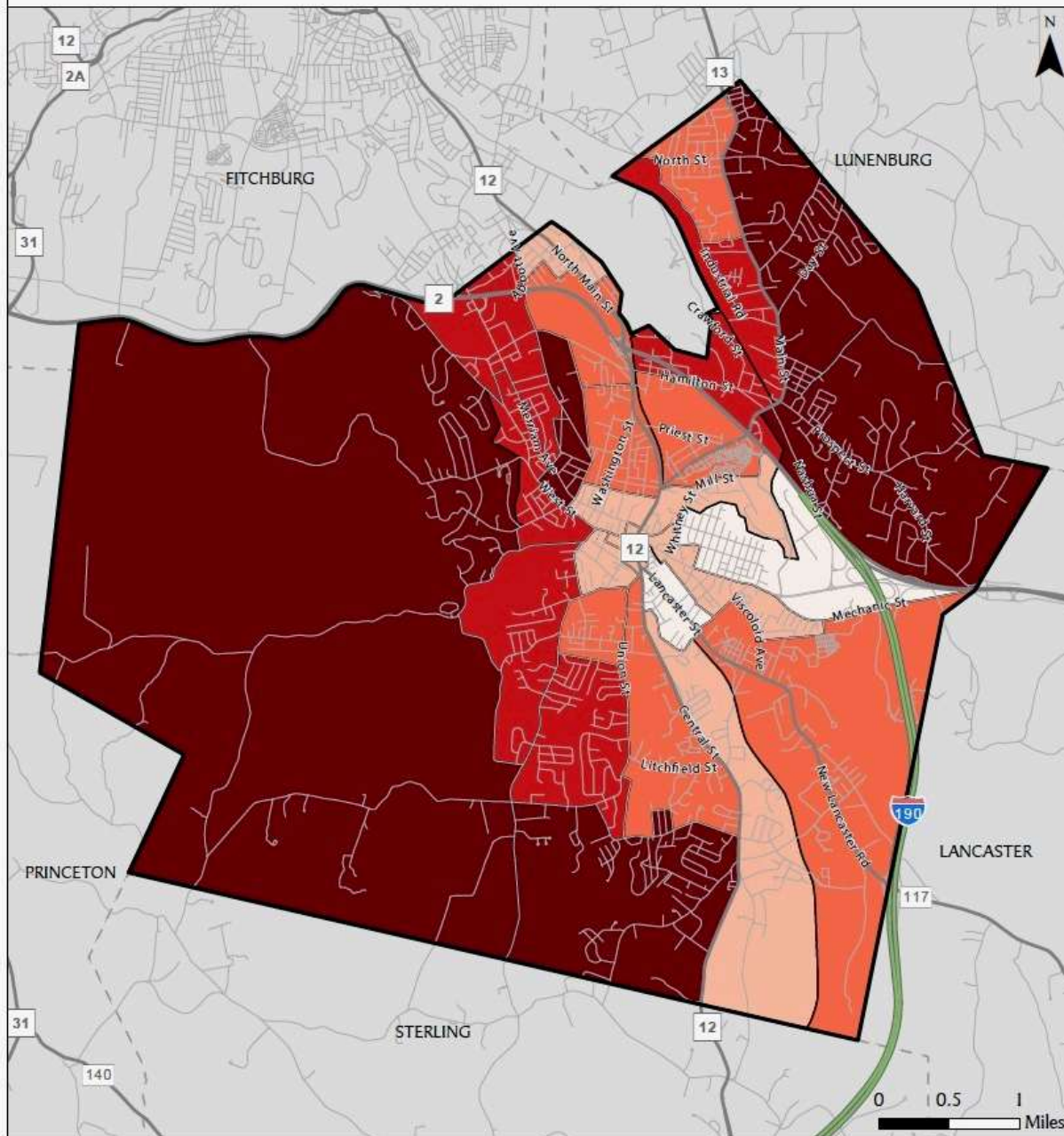
## Median Household Income



## MassDOT Roads



Source: City of Leominster, MassGIS,  
MassDOT, US Census Bureau ACS  
2015-2019, and HUD CHAS 2013-2017



**Leominster MHI Map**

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

### Summary of Housing Needs

The Consortium has faced economic challenges for decades, and COVID-19 has exacerbated this. Location-based challenges, a lack of employment opportunities, stagnant population growth, and other patterns contributed to unemployment and foreclosures during the Great Recession that affects Fitchburg today. There are unresolved issues related to foreclosed properties, properties that are bank owned and vacant, and properties subject to improper foreclosures with title issues. These conditions have left the City with problem properties.

Homeownership, particularly among LMI minority households, remains a high priority. Due in part to COVID-19, single-family home sales are picking up as people search for options outside the Boston area. Fitchburg's population and MHI have increased only slightly over the past decade. ES-202 data published by the Department of Unemployment Assistance emphasizes that Consortium cities fall below state/county wage averages. Weekly wages in Fitchburg are 13% lower than the state. Of the Consortium's 31,600 households, at least 59% earn less than the HAMFI reported by HUD. Approximately 19% of Fitchburg's households and 16% of Leominster's households are earning 30% or less than the AMI or are extremely low-income. Fifteen percent of Fitchburg households and 16% of Leominster households are earning between 30 – 50% of AMI. Lastly, 18% of Fitchburg households and 16% of Leominster households have incomes between 50 – 80% of the AMI. In total, 51 percent of Fitchburg's households and 47% of Leominster's households are LMI. Nineteen percent of Fitchburg households pay between 30-50% of their income on housing, compared to 18% in Leominster. Roughly 10% of Fitchburg households and 14% of Leominster households are severely cost burdened. A higher number of extremely low-income households are spending over 50% of their income on housing (60% in both cities) compared households in the other income brackets. Households earning 80-100% AMI also experience cost burden, to a lesser degree. Nine percent is cost-burdened in Leominster and 8% in Fitchburg, proving cost burden affects all of the Montachusett region. CHAS confirms that even households making above the AMI are cost-burdened – 8% in Fitchburg and 12% in Leominster. Just as extremely low-income households are more likely to experience cost burden, Tables 7, 8, and 11 indicate they are also more likely to experience overcrowding and severe overcrowding. Extremely low-income households are 36% of households considered severely overcrowded, and 53% of households considered overcrowded. Single-family homes see the most overcrowding. Additionally, 40% of extremely low-income households lack complete plumbing or kitchen facilities. Cost burden for owners and renters is an ongoing concern of staff and providers. Data indicates that despite the housing stock's relative affordability compared to MA, purchasing a home remains unattainable. Of those who can purchase a home, many cannot maintain it. The Consortium's inventory is old – 36% of homes were built in 1939 or earlier. The median year of construction in Fitchburg's is 1950 and 1966 in Leominster. Thirty-eight percent of the rental stock and 30% of the ownership stock are at least 80 years old. Two percent has been constructed since 2010. Meanwhile, thousands are on waiting lists for housing, and numerous properties sit vacant.

Demographics	Base Year: 2009	Most Recent Year: 2015	% Change
Population	81,155	81,635	1%

Demographics	Base Year: 2009	Most Recent Year: 2015	% Change
Households	30,806	31,610	3%
Median Income	\$51,755.00	\$53,155.00	3%

**Table 5 - Housing Needs Assessment Demographics**

**Alternate Data Source Name:**

ACS Data

**Data Source Comments:**

### Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	5,620	4,490	5,110	3,095	13,300
Small Family Households	1,675	1,565	1,730	1,435	7,805
Large Family Households	285	215	270	265	885
Household contains at least one person 62-74 years of age	895	915	970	655	2,315
Household contains at least one person age 75 or older	985	1,105	855	290	584
Households with one or more children 6 years old or younger	1,010	639	650	515	1,455

**Table 6 - Total Households Table**

**Data Source:** 2011-2015 CHAS

## Housing Needs Summary Tables

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

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	100	80	25	0	205	0	25	50	0	75
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	220	130	195	40	585	0	25	0	0	25
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	115	15	49	20	199	30	30	10	0	70
Housing cost burden greater than 50% of income (and none of the above problems)	2,335	885	65	0	3,285	810	475	480	70	1,835
Housing cost burden greater than 30% of income (and none of the above problems)	715	1,055	815	50	2,635	205	470	675	515	1,865

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Zero/negative Income (and none of the above problems)	155	0	0	0	155	120	0	0	0	120

**Table 7 – Housing Problems Table**

Data 2011-2015 CHAS

Source:

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

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	2,780	1,105	345	60	4,290	840	555	535	70	2,000
Having none of four housing problems	1,500	1,875	2,385	1,485	7,245	230	955	1,845	1,490	4,520
Household has negative income, but none of the other housing problems	155	0	0	0	155	120	0	0	0	120

**Table 8 – Housing Problems 2**

Data 2011-2015 CHAS

Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,350	935	350	2,635	155	295	375	825
Large Related	265	69	29	363	0	74	100	174
Elderly	685	535	215	1,435	634	570	420	1,624



	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Other	1,145	580	360	2,085	255	59	285	599
Total need by income	3,445	2,119	954	6,518	1,044	998	1,180	3,222

**Table 9 – Cost Burden > 30%**

Data 2011-2015 CHAS  
Source:

#### 4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,135	430	45	1,610	125	200	115	440
Large Related	190	10	0	200	0	70	50	120
Elderly	480	300	40	820	520	220	200	940
Other	915	215	0	1,130	195	45	115	355
Total need by income	2,720	955	85	3,760	840	535	480	1,855

**Table 10 – Cost Burden > 50%**

Data 2011-2015 CHAS  
Source:

#### 5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	295	105	175	40	615	30	55	10	0	95
Multiple, unrelated family households	10	0	4	20	34	0	0	0	0	0
Other, non-family households	35	40	65	0	140	0	0	0	0	0
Total need by income	340	145	244	60	789	30	55	10	0	95

**Table 11 – Crowding Information - 1/2**

Data 2011-2015 CHAS  
Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	995	615	655	2,265	0	165	194	359

**Table 12 – Crowding Information – 2/2**

**Alternate Data Source Name:**

CHAS - Households with Children Present

**Data Source**

**Comments:**

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

According to ACS, one-person households are 12.8 percent of owner-occupied households and 16.2 percent of renter-occupied households in the Consortium. A total of 9,201 householders live alone, including 4,269 males (4.2 percent) and 4,932 females (6 percent). Together this equals 29 percent of nonfamily households. The median income for a male householder living alone in Fitchburg is \$40,603, versus \$39,173 in Leominster. The median income for a female householder living alone in Fitchburg is \$25,404 and \$22,528 in Leominster. Of the Consortium's owner-occupied householders living alone, 0.8 percent are between 15 and 34 years, 6.2 percent are between 35 and 64 years, and 5.8 percent are 65 and older. Of the Consortium's renter-occupied householders living alone, 1.9 percent are between 15 and 34, 8.3% are between 35 and 64, and 6 percent are 65 and older. HUD's 2021 income limits indicate that a one-person household making \$50,200 or less qualifies as low-income (80 percent AMI). When considering the sale prices and rents, single householders have limited (if any) funds available for other expenses after housing costs such as food, a vehicle, and healthcare. Many single renters reportedly found it difficult to afford to live in the region.

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

ACS provides estimates for disabilities. School enrollment data sheds light on disabled youth needs. There are 11,599 with a disability, 47% male and 53% female. 0.4% are under 5, 8.1% between 5-17, 7.7% between 18-34, 16.3% are 35-64, 22.4% are 65-74, and 45.1% older than 75. 13% of the Hispanic population has a disability.

There are 4,439 with independent living difficulty, 2,590 with self-care difficulty, 5,432 with ambulatory difficulty, 6,154 with cognitive difficulty, 1,737 with vision difficulty, and 2,495 with hearing difficulty. Of those under 18, 0.3% have 2+ disabilities. 4% between ages 18-64 have 2+ disabilities, and 3% of those 65+. 3% between ages 18-64 had incomes below poverty level. DESE reports 1,269 special education students in Fitchburg with a disability and 1,418 in Leominster.

[See Appendix for Figure NA-10.1]

DV data was not readily available, but issues exist. DV victims struggle with homelessness - 5% of homeless individuals (68) were victims during the PIT. 28% were unsheltered, 66% were in shelter, and 7% in transitional housing. CMHA counted 33 unsheltered victims in 2021. Providers service victims through housing/shelter in the CoC. The main providers are the Spanish American Center, the YWCA Central MA DV Services (BWR), and Pathways for Change. Each offers support, education, court advocacy, transportation, etc. Based on data and discussions, victims require technical assistance and housing with services.

According to SAPSS, 2,100 unduplicated incidents were reported to the DPHs Rape Crisis Centers (RCCs), including the Spanish language hotline. Survivors reported 1,550 incidents and family members, etc. reported 524. 17% of women and 5.5% of men reported assault in 2016. The DV Counts MA Summary reported 1,760 victims in one day in 2017. Of those, 712 found refuge in shelters and transitional housing. There were 1,048 adults/children that received non-residential assistance. Fitchburg's DV Advocate serviced to 128 victims in 2021; 8% percent required housing assistance. Leominster Police DV Liaison referred 157 victims to public housing.

### **What are the most common housing problems?**

The most prevalent housing problems in the Consortium are the high cost of housing relative to income/wages, the lack of affordable and accessible units with incomes below 80 percent AMI, the lack of housing with added social services, limited options for those who are homeless/at-risk of homelessness, the aging and decrepit housing stock, the growing wait lists for publicly subsidized units, landlord/tenant disputes, and vacant units sitting idly due to complications with foreclosures

### **Are any populations/household types more affected than others by these problems?**

Minorities, the elderly, the disabled, and extremely low-income groups are disproportionately affected by housing problems compared to the Consortium at large. Problems consist of cost-burden, overcrowding, and substandard housing. These groups are more likely to experience severe housing problems, often sacrificing necessities to afford to live. Other populations most affected by these problems are LMI renters, nonfamily renters such as those living alone, special needs populations, and "small-family" and "small related" renters, as seen in Tables 6 and 9.

**Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the**

## **needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance**

Of the Consortium's 5,320 extremely low-income households, 995 (18 percent) have children (see Table 12). HUD classifies households with children present as a household with at least one child six years old or younger when distinguishing lead hazards. There are 780 very low-income households (30-50 percent AMI) and 849 low-income households (50-80 percent AMI) with children present, totaling 2,624 LMI households in the Consortium, or 17 percent of LMI households. Households with children at-risk of homelessness, currently homeless, or transitioning out of homelessness face several challenges. The lack of affordable housing with supportive services, limited public transportation, geographic isolation, low wages, and high childcare costs interfere for many in the Consortium's service area. Often, at-risk households include someone who recently lost their job, had their work hours reduced, or encountered a medical emergency and have therefore depleted their savings.

Lack of public transportation is challenging for people seeking employment beyond the immediate area, specifically entry-level workers entering/re-entering the workforce. The Consortium already has limited employment opportunities. If at-risk households lack education, skills, and transportation, they are not competitive candidates. Formerly homeless families/individuals, those at-risk of residing in shelters/becoming unsheltered, and those nearing the termination of rapid Re-housing are more vulnerable when services are not available. Without secure services, many cannot support themselves and are likely to re-enter homelessness or become unsheltered. In short, job training, education, employment opportunities, affordable childcare, affordable housing, transportation access, and affordable healthcare are serious needs.

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

People at risk of homelessness are individuals/families facing immediate eviction and cannot relocate to another residence. Statistics are not readily available, but an examination of overcrowding and cost burden data helps understand the extent of the problem. Table 7 indicates 179 LMI renter households experience overcrowding and 545 LMI renter households experience severe overcrowding in the Consortium.

The number of extremely LMI renter households with severe cost burden is 2,335. There are 715 extremely LMI renter households that are cost-burdened. There are 810 severely cost-burdened, extremely LMI owner households and 205 cost-burdened, extremely LMI owner households. With the average Consortium household having 2.36 people, roughly 9,593 people are at-risk of homelessness  $((2.36 * (2,335 + 715 + 810 + 205))$ .

### **Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness**

Housing characteristics linked to instability and high risk of homelessness include the housing costs relative to income, the supply of affordable units, a lack of accessible features, long waiting lists for units/vouchers, the age of housing, and poor maintenance patterns. Fitchburg's housing suffers from code violations stemming from deferred maintenance. Code issues and decaying infrastructure create uninhabitable living conditions that can force some into homelessness. Code violations and poor living standards strongly affect elderly homeowners who cannot afford to maintain their homes. The foreclosure crisis continues to create problems for the Consortium's housing market, as unresolved legal and management issues, vacancy, and improper foreclosures continue. According to the ACS, there are 2,505 vacant housing units in the Consortium - 64 percent in Fitchburg. Of those units, 523 are available for rent, 206 are rented but not occupied, 456 are for sale, 280 are sold and not occupied, seven are for seasonal/recreational/occasional use, and 1,033 are classified as "other vacant."

## **Discussion**

The Fitchburg-Leominster Consortium has a housing crisis. Limited economic opportunities and a lack of infrastructure worsen this by limiting LMI populations. Renters, the elderly, the disabled, small-related households, those transitioning out of homelessness, those nearing the end of their Rapid Rehousing assistance, DV victims, single non-family households, and other groups mentioned are unable to earn the incomes to afford housing without being cost burdened. Sixty-two percent of LMI households in the Consortium are cost-burdened and 34 percent are severely cost burdened. These households have the greatest need for adequate, safe, and affordable housing, and are more likely to suffer from multiple housing problems. People suffering from mental and physical disabilities are further limited as they are often unable to work and need case management. The worker shortage furthers instability and increases risk of homelessness. Representatives from housing providers, community development organizations, and City staff are overcoming these barriers. The greatest need is for employment opportunities and training to afford rent, utilities, maintenance and other housing expenses.

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

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

“Disproportionately Greater Need” evaluates housing needs of minorities compared to the total population. It is the result of dividing the number of minority households with one or more housing problems by the total households for that racial or ethnic group.<sup>23</sup> HUD determines disproportionately greater need exists when a racial group in an income category is 10 percentage points higher than the percentage of the entire income category. Minorities continue to face a disproportionately greater need for adequate housing in the Consortium. Nineteen percent of the Consortium’s population is considered a minority. Black and people classified as “Other Race” by the ACS are the largest minorities – each six percent of the total population. Twenty-four percent of the Consortium’s population is Hispanic or Latino - twelve percentage points higher than both the county and state.

[See Appendix for Figure Figure NA-15.1]

An analysis of the tables below reveals that American Indians/Alaskan Natives (61 percentage points higher than the Consortium), Asians (17 percentage points higher than the Consortium), and Hispanic populations (14 percentage points higher than the Consortium) are disproportionately affected by housing problems compared to the Consortium. Black populations are disproportionately affected by housing problems by eight percentage points.

### 0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,530	810	275
White	2,750	510	190
Black / African American	320	10	0
Asian	75	0	4
American Indian, Alaska Native	15	0	4
Pacific Islander	0	0	0
Hispanic	1,250	290	79

**Table 13 - Disproportionally Greater Need 0 - 30% AMI**

Data Source: 2011-2015 CHAS

\*The four housing problems are:

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

### 30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,185	1,305	0
White	2,185	995	0
Black / African American	70	30	0
Asian	230	0	0
American Indian, Alaska Native	34	0	0
Pacific Islander	0	0	0
Hispanic	660	220	0

**Table 14 - Disproportionally Greater Need 30 - 50% AMI**

Data Source: 2011-2015 CHAS

\*The four housing problems are:

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

### 50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,370	2,740	0
White	1,800	2,135	0
Black / African American	65	85	0
Asian	0	40	0
American Indian, Alaska Native	54	0	0
Pacific Islander	0	0	0
Hispanic	430	450	0

**Table 15 - Disproportionally Greater Need 50 - 80% AMI**

Data Source: 2011-2015 CHAS

\*The four housing problems are:

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

### 80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	685	2,410	0
White	575	1,710	0
Black / African American	25	119	0
Asian	25	45	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	65	480	0

**Table 16 - Disproportionally Greater Need 80 - 100% AMI**

Data Source: 2011-2015 CHAS

\*The four housing problems are:

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

### Discussion

Extremely low-income minority households have a disproportionately greater need than extremely low-income Consortium households as a whole. Also seen in the 2016-2020 Consolidated Plan, 100 percent of American Indian and Alaskan Natives households with 0-30 percent AMI face one or more housing problems compared to 78 percent of the Consortium. LMI American Indians/Alaskan Natives are the most disproportionately affected group in the Consortium, with 100% of extremely low income, very low income, and low income (<30-80 percent="" ami="" income="" brackets="" having="" at="" least="" span="">one of the four housing problems. Two other disproportionately affected groups are poor Black and Asian households; 98 percent of extremely low-income Black households and 97 percent of extremely low-income Asian households have at least one housing problem.

[See Appendix for Figure NA-15.2]

Of households making 30-50 percent AMI, 100 percent of Asian and American Indian and Alaskan Natives households have a housing problem compared to 71 percent of the Consortium. Although other minorities in this income bracket do not meet the 10 percentage point threshold, rates of housing problems in each group remain high. For example, 68 percent of 30-50 percent AMI



Hispanic households and 33 percent of Black households have a housing problem. The trend continues with those households making 50-80 percent AMI; 100 percent of American Indian and Alaskan Natives households have at least one housing problem compared to 46 percent of the Consortium. Forty-nine percent of very low income Hispanic households, 47 percent of “Other” racial households, and 19 percent of Blacks have a housing problem. Those making 80 percent AMI and higher are also suffering. Black, Asian, and White moderate-income households experience disproportionately greater need. Black and American Indian and Alaskan Native households making 100%+ AMI are also disproportionately affected.

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

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

According to CHAS data, 23 percent of Fitchburg's households and 19 percent of Leominster's households have at least one of four severe housing problems.<sup>26</sup> Prior data indicates trend similarities, with those considered extremely low-income continuing to experience the highest rates of severe housing issues. Minorities experiencing high rates of non-severe housing problems are also more likely to experience at least one severe housing problem, especially among extremely low-income American Indian and Alaskan Natives. Moreover, the data represents a need for adequate, affordable housing for all LMI minority groups in the Consortium.

An analysis of the tables below reveal that American Indian and Alaskan Native (79 percentage points higher than the Consortium), Asian (20 percentage points higher), Hispanic or Latino (12 percentage points higher), and Black (10 percentage points higher than the Consortium) races are disproportionately affected by severe housing problems. A reminder that "disproportionately greater need," comes from dividing the number of minority households with one or more housing problems by the total number of households for that racial or ethnic group. HUD determines disproportionately greater need exists when a racial group in an income bracket is 10 percentage points higher than the percentage the entire income category. Please note that the values for the listed races do not add up to the value for the jurisdiction as a whole. HUD is aware of these inconsistencies with the IDIS (Integrated Disbursement & Information System) data and is working to correct these errors.

### 0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,620	1,730	275
White	2,260	1,005	190
Black / African American	300	25	0
Asian	55	20	4
American Indian, Alaska Native	15	0	4
Pacific Islander	0	0	0
Hispanic	875	665	79

**Table 17 – Severe Housing Problems 0 - 30% AMI**

Data Source: 2011-2015 CHAS

\*The four severe housing problems are:

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

**30%-50% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	1,660	2,830	0
White	1,160	2,010	0
Black / African American	15	90	0
Asian	190	40	0
American Indian, Alaska Native	4	30	0
Pacific Islander	0	0	0
Hispanic	280	595	0

**Table 18 – Severe Housing Problems 30 - 50% AMI**

Data Source: 2011-2015 CHAS

\*The four severe housing problems are:

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

**50%-80% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	880	4,230	0
White	650	3,290	0
Black / African American	20	130	0
Asian	0	40	0
American Indian, Alaska Native	0	54	0
Pacific Islander	0	0	0
Hispanic	210	670	0

**Table 19 – Severe Housing Problems 50 - 80% AMI**

Data Source: 2011-2015 CHAS

\*The four severe housing problems are:

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

### 80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	130	2,975	0
White	60	2,220	0
Black / African American	25	119	0
Asian	0	70	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	40	505	0

**Table 20 – Severe Housing Problems 80 - 100% AMI**

Data Source: 2011-2015 CHAS

\*The four severe housing problems are:

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

### Discussion

Extremely low-income minority households have a disproportionately greater need than extremely low-income Consortium households. All American Indian and Alaskan Native households making 50 percent or less AMI have one or more severe housing problems, compared to 61 percent of extremely low-income and 36 percent very low-income Consortium households. When calculating totals, American Indian and Alaskan Native and Asian minorities are the most disproportionately affected by severe housing issues across the board. Other affected groups are extremely low-income Black and “Other” racial households. Ninety-eight percent of extremely low-income Black households, and 83 percent of extremely low-income “Other” households, have a severe housing problem.

[See Appendix for Figure NA-15.3]

Of households making 30-50 percent AMI, 100 percent of American Indian and Alaskan Natives and 94 percent of Asian households have a housing problem compared to 36 percent of Consortium household making 30-50 percent AMI. Every minority in this income bracket other than Pacific Islander and “Other” vastly exceed the 10 percentage point threshold. For example, 10 percent of Black households, 41 percent of White households, and 30 percent of Hispanic households experiencing disproportionately greater need. For those making 50-80 percent AMI, there are no groups experiencing disproportionately greater need. Black households with severe housing problems making 80-100 percent AMI surpass the Consortium by 43 percentage points. Black and Hispanic households making 100%+ AMI are in disproportionately greater need compared to the Consortium by 14 and 13 percentage points, respectively.

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

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

Cost burden is the most prevalent housing issue in the Consortium. Thirty-six percent of households spend at least 30 percent of their income on housing and 17 percent spend at least 50 percent; this equals 16,515 total households. Every minority is disproportionately cost-burdened compared to the Consortium: 41 percent of Black households (425 households), 51 percent of Asian households (385), 99 percent of American Indian and Alaskan Natives households (89), and 46 percent of Hispanic households (2,260). Further analysis reveals that American Indian and Alaskan Natives (80 percentage points higher than the Consortium), and Asians (32 percentage points higher), are most disproportionately affected by cost-burden.

[See Appendix for Figure NA-25.1]

### Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	19,750	5,775	5,760	320
White	15,910	4,165	3,850	220
Black / African American	600	220	340	10
Asian	304	125	280	4
American Indian, Alaska Native	10	124	19	4
Pacific Islander	0	0	0	0
Hispanic	2,625	1,100	1,170	79

**Table 21 – Greater Need: Housing Cost Burdens AMI**

Data Source: 2011-2015 CHAS

### Discussion

A comparative analysis between minority and the Consortium's cost-burdened households provides a clearer understanding of those struggling. Minorities do not comprise a large portion of the population, but those living in Fitchburg and Leominster experience disproportionately greater need in each category of housing problems. Non-white populations suffer at higher rates in almost every LMI income

classification. Minorities, extremely low-income households, those transitioning out of homelessness, and those with mental and physical disabilities are more affected by the discrepancies between housing costs and incomes. If the housing stock does not improve, multiply, and diversify, more will face hardship.

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

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

Racial and ethnic minorities experience disproportionately greater need in the following: housing problems, severe housing problems, and cost burden. LMI American Indian and Alaskan Native households are the most affected group i, experiencing close to 100% of disproportionate need in each income bracket. Asian, Hispanic, and Black households are also affected in each bracket, even households making at or above 80% AMI.

### **0-30% AMI**

- 100% of American Indian and Alaskan Natives households, 98% of Black households, and 97% of Asian households have 1 or more of the 4 housing problems compared with 78% of the Consortium.
- 100% of the American Indian and Alaskan Natives households, 98% of Black households, 83% of “Other” racial households, and 71% of Asian households have 1 or more of the 4 severe housing problems compared with 61% of the Consortium.

### **30-50% AMI**

- 100% of American Indian and Alaskan Natives households and 100% of Asian households have 1 or more of the 4 housing problems compared with 71% of the Consortium.
- 100% of American Indian and Alaskan Natives households and 94% of Asian households have 1 or more of the 4 severe housing problems compared with 36% of the Consortium.

### **50-80% AMI**

- 100% of American Indian and Alaskan Natives households have 1 or more of the 4 housing problems compared with 46% of the Consortium.
- There were no minority groups experiencing disproportionately greater need in this income bracket according to the data.

### **80-100% AMI**

- 80% of Asian households and 70% of Black households have 1 or more of the 4 housing problems compared with 26% of the Consortium
- 47% of Black households have 1 or more of the 4 severe housing problems compared with 4% of the Consortium.

### **100+% AMI**



- 100% of American Indian and Alaskan Natives households and 34% of Black households have 1 or more of the 4 housing problems compared with 11% of the Consortium.
- 19% of Black households and 18% of Hispanic households have 1 or more of the 4 severe housing problems compared with 5% of the Consortium.

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

Minorities face the same issues with substance abuse, mental and physical disabilities, homelessness, lack of transportation, and lack of employment as the larger population. However, higher rates of housing problems in both cities magnify these issues. The analysis indicates the need for more affordable housing and subsidized housing with supportive services for minorities. Transitional and permanent supportive housing can help keep those in need stably housed and employed. Other needs gleaned through the CPP process included the need for case management services, housing search assistance, transportation, employment assistance, childcare, and substance abuse treatment.

Fitchburg has a large ESL population. Focus groups highlighted overcoming language barriers to reach this population. Language barriers often mean the difference between helping someone and worsening the problem. Housing and social service providers often have translators available to assist with applications, referrals, case management, and other technical assistance. The Consortium continues to stress treating those of all financial, racial, and ethnic backgrounds equitably.

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

The highest concentrations of racial or ethnic minorities are in and around the cities' Downtowns. Defining characteristics of these areas include higher percentages of rental housing, older structures, and concentrations of LMI households, more affordable living choices, and proximity to services. Leominster's racial and ethnic groups are more dispersed throughout the city's east side and not as concentrated in specific areas. Maps of minority populations are at the end of this section.

[See Appendix for Maps of Minority Populations for Fitchburg and Leominster]

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

### Introduction

The Fitchburg and Leominster Housing Authorities manage 935 housing units and 654 housing vouchers. The tables in this section are prepopulated with data submitted by housing authorities to HUD and compiled by the Public and Indian Housing Information Center (PIC). The Consortium consulted with both housing authorities to verify the data reflected the needs of public housing within the Consortium. The Citizen Participation Plan process prompted each PHA to provide insight into housing needs as part of this Consolidated Plan. One PHA responded to the Community Needs Survey and participated in the focus group sessions. The PHA's answered questions about programming, inventory, and tenants upon request. The information herein is indicative of public housing issues in the region. The Chapter 40B Subsidized Public Housing Inventory (SHI) for Fitchburg and Leominster includes units subsidized by state and federal sources. Fitchburg has 1,581 subsidized public housing units on its SHI, bringing the City close to meeting the state's 10 percent threshold under M.G.L. Chapter 40B (9.2 percent). Two hundred and fifty-five vouchers distributed by FHA supplements these units. Leominster's SHI has 1,369 units, bringing the City to 7.7 percent of subsidized public housing. The LHA administers 399 vouchers. The demand for accessible, affordable public housing continues as the market becomes increasingly restrained in the Commonwealth. Waiting lists are growing, despite lists already containing families and individuals who have been waiting for several years for a unit or voucher. (Note: DHCD, FHA, and LHA provided better information to reflect the number of units and vouchers in the Consortium. Alternate data will replace that compiled by the PIC in IDIS. Other tables in this section utilize pre-populated data from HUD.)

### Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	0	452	0	452	0	0	0

**Table 22 - Public Housing by Program Type**

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

**Data Source:** PIC (PIH Information Center)

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## Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	0	92	0	92	0	0
# of Disabled Families	0	0	0	196	0	196	0	0
# of Families requesting accessibility features	0	0	0	452	0	452	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

**Table 23 – Characteristics of Public Housing Residents by Program Type**

**Data Source:** PIC (PIH Information Center)

## Race of Residents

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	0	407	0	407	0	0	0
Black/African American	0	0	0	36	0	36	0	0	0
Asian	0	0	0	5	0	5	0	0	0
American Indian/Alaska Native	0	0	0	4	0	4	0	0	0
Pacific Islander	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0
<b>*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition</b>									

**Table 24 – Race of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

## Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	0	240	0	240	0	0	0
Not Hispanic	0	0	0	212	0	212	0	0	0
<b>*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition</b>									

**Table 25 – Ethnicity of Public Housing Residents by Program Type**

**Data Source:** PIC (PIH Information Center)

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

The Consortium has the following accessible housing needs based on the consultation process, Census data, and PHA waiting lists:

- Subsidized housing for the elderly and non-elderly;
- Services to increase independence for the elderly or families with disabilities;
- Affirmative fair housing measures to ensure access regardless of race, color, religion, national origin, sex, familial status, disability, and sexual orientation;
- Modifications in public housing based on Section 504 Needs Assessment for Public Housing, including state and federal units;
- Adequate, safe, affordable housing with mental health services;
- Wheelchair-accessible apartments at the PHA properties; and
- Affordable family units that are all on one floor.

Many households are waiting for an LHA or FHA unit, many requiring an elderly or disability-friendly unit. Average wait times for PHA units expand several years. The greatest needs are: new rental units for families; family handicapped units; and two and three-bedroom units. The current inventory is old, in need of renovations, and does not match the needs of those on waiting lists.

## **What are the number and type of families on the waiting lists for public housing and section 8 tenant-based rental assistance? Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?**

Of the 12,127 applicants on the FHA's waitlist, 8,766 are applicants for family housing, and 715 are applicants for elderly housing. There are 180 applicants in need of congregate elderly housing and 404 in need of congregate non-elderly housing. The FHA also has 624 people waiting for a housing voucher. There are 3,629 two-bedroom and 2,136 three-bedroom applicants on LHA's waitlist. There are also 988 elderly applicants and 1,071 young disabled applicants waiting for housing. The immediate needs of PHA residents and Housing Choice Voucher holders is a larger inventory of decent, safe, accessible, and affordable units for various household types. The Consortium also needs disability-friendly and elderly units throughout. Responses from the CPP requested housing for those with full-time case management needs, more diverse rental options for different ages and income thresholds, and jobs/competitive wages to fill the gap between housing costs and incomes.

## **How do these needs compare to the housing needs of the population at large**

The needs of PHA residents and voucher holders align with the needs of the community at-large, as HUD's income limits for the Metropolitan Statistical Area (MSA) incorporate a large percentage of

the population. The needs above reflect the housing needs of the general population in Fitchburg and Leominster. All residents desire safe, decent, affordable housing accompanied by employment opportunities, access to transportation, and availability of services.

## **Discussion**

PHAs struggle to meet the regional need because there are not enough public housing units or vouchers. Housing authorities must give preference to homeless persons, people living in substandard housing, people involuntarily displaced, and those who are severely cost-burdened. If a family or individual experiences these situations, they can move ahead of others on the list. Unfortunately, many PHAs have closed their waiting lists due to the overwhelming volume of applicants. Increasing and improving the supply was the most requested action by housing professionals during this process. There are minimal differences between PHA tenants and the general population. Many turn to PHA's at some point.

Fitchburg and Leominster will continue to work with their housing authorities on providing affordable units, prioritizing increasing the rental supply, shrinking waiting lists, and preventing displacement. There will be opportunities for agencies to assist tenants in searching for more permanent housing and employment. PHA residents often need social service support and access to these services. To help those in need, those staffing the service professions must access affordable housing in Fitchburg and Leominster. There must also be employment opportunities that offer competitive wages, affordable childcare/eldercare, job training, and transportation options.

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

### **Introduction:**

Homelessness is an ongoing concern in the Consortium. Programs for homelessness and prevention include the Community Service Block Grant Program (CSBG), McKinney Funds, the Residential Assistance for Families in Transition (RAFT) Program, Interagency Council on Housing and Homelessness (ICHH), Homeless Prevention and Rapid Rehousing Program (HPRP). Most families facing homelessness receive assistance through the Emergency Assistance (EA) program operated by DHCD. Under Massachusetts law, families with children and household incomes under 115 percent of poverty guideline have the right to be properly sheltered. The Department of Transitional Assistance does not offer Emergency Assistance in Fitchburg, so families must travel to Worcester to receive this service.

Homeless data is not available specifically for Fitchburg and Leominster. Information comes from the Worcester City and County CoC, which incorporates the entire service area. Results from the most recent Point in Time (PIT) Count (2020) confirmed there were 171 unsheltered homeless individuals in the CoC; fifty-nine (35 percent) were chronically homeless. Of the unsheltered, 95 were severely mentally ill, 62 had chronic substance abuse issues, nineteen were DV victims, and nine were veterans. The PIT Count identified 419 people in emergency shelters and 271 people in transitional housing on the night of January 29, 2020. There were 1,401 people in total, with 471 under 18 (33 percent). The charts below outline the PIT Count Summary Data. Due to a lag in the PIT data, this plan also considers 2021 data from the Central Massachusetts Housing Alliance (CMHA). According to the CMHA, North County (consisting of communities in the Montachusett region) had 93 unsheltered homeless individuals on the night of their count. Twenty-two were considered chronically homeless. Sixty-one unsheltered individuals had a serious mental illness, 55 suffered from substance abuse issues, 33 were DV victims, and six were HIV/AIDS patients.

Chronically homeless individuals often experience overlapping issues that contribute to their inability to stay housed, such as behavioral or cognitive problems and substance abuse. They need support to transition out of and stay out of homelessness. Those at-risk of homelessness include people at or below 30 percent AMI, people with mental health or substance abuse issues or HIV/AIDS, people exiting incarceration, DV victims, and veterans. The homeless and those at-risk are equally affected by the lack of well-paying jobs and housing availability in the Consortium. Counseling, health care, and employment training should be prioritized for these groups. Case management for youth and young parents is also a need. National, state, and local funding for homelessness prevention has declined, so it has become critical to secure additional



funding for programs such as landlord negotiation, emergency utility payments, and Housing First in conjunction with case management. The COVID-19 pandemic will compound these issues for the foreseeable future.

## Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	649	3	0	0	0	0
Persons in Households with Only Children	0	1	0	0	0	0
Persons in Households with Only Adults	213	185	0	0	0	0
Chronically Homeless Individuals	29	59	0	0	0	0
Chronically Homeless Families	70	0	0	0	0	0
Veterans	8	9	0	0	0	0
Unaccompanied Child	13	12	0	0	0	0
Persons with HIV	5	5	0	0	0	0

**Table 26 - Homeless Needs Assessment**

Data Source Comments:

Indicate if the homeless population is: Has No Rural Homeless

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

Data was not available for the number of people entering/exiting homelessness each year or the number of days that people experience homelessness. It is difficult to estimate as PIT Counts do not have that level of detail. A description of each category is provided using CoC information from 2015 to 2020, which includes Fitchburg and Leominster.

#### Chronically Homeless

PIT Counts from 2015-2020 show fluctuations among chronically homeless unsheltered individuals, with a 96% increase from 2019-2020. Since 2015, there has been a 180% increase in emergency shelter admissions for those with children (from 25 to 70 families) and a 93% increase among individuals without children. There have been no instances of unsheltered chronically homeless families since 2015. CMHA reported 22 chronically homeless individuals in 2021; 3 had at least 1 child and the remainder did not have children.

[See Appendix for Figures NA-40.1, .2, .3, and .4]

#### Families with Children

PIT Counts relay a decrease in unsheltered families with children between 2015-2020, from 2 to 1. There has been a 28% decrease in sheltered families with children over 5, with a 23% drop since 2018. In 2015, there were 365 families with children; in 2020, there were 250. There was a 44% decrease in families entering transitional housing. The Fitchburg School District reported 214 homeless students in 2021. Leominster's School District reported 463 homeless students. CMHA counted 3 households with at least 1 child and 1 adult, consisting of 8 people in 2021. Of the 8 individuals, 4 were under 18, 5 were female, each was White, 2 were Hispanic, and all were sheltered.

#### Veterans and their Families

PIT Counts show a 200% increase in unsheltered homeless veterans between 2015 and 2020 in the CoC (from 3 to 9). The number of sheltered homeless veterans decreased by 96%. Since 2015, there has been a 91% increase in homeless veterans – dropping from 181 to 17 (there are fluctuations

in the data due to a change in HUD's reporting.). CMHA reported 4 unsheltered veterans in 2021; each male, one was Black, and all were unsheltered.

#### Unaccompanied Youth

There have been no emergency shelter entries for unaccompanied youth in the past 5 years. There have been minimal unsheltered, unaccompanied youth. Most upward trending is among those 18-24, including transitional housing - 13% increase since data reporting began in 2017. There has been a 64% decrease in unaccompanied youth entering shelters. There was a 76% increase in unaccompanied youth between 2015-2020 (29 to 67). CMHA counted 11 sheltered and 24 unsheltered unaccompanied youth, each between 18 and 24. 3 of the sheltered individuals were female, as opposed to 7 unsheltered individuals. 4 sheltered individuals were Hispanic, 4 were Black, and 7 were White non-Hispanic. 6 unsheltered individuals were Hispanic, 2 were Black, 1 was multiracial, and 15 were White non-Hispanic.

### Nature and Extent of Homelessness: (Optional)

<b>Race:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
White	622	171
Black or African American	206	14
Asian	9	2
American Indian or Alaska Native	6	0
Pacific Islander	1	0
<b>Ethnicity:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
Hispanic	369	50
Not Hispanic	493	139

Data Source

Comments:

### Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

The PIT counts people experiencing homelessness in emergency shelters, transitional housing, motels (if paid for by an agency), on the street, in cars, in abandoned buildings, and other places unsuitable for human habitation. The most recent PIT Count reported 1,401 homeless people in the CoC. There were 649 households with children in shelters and three unsheltered families. There were 773 homeless households with at least one adult and one child - 471 (61 percent) had at least one child under eighteen. Sixty households (8 percent) had at least one person between 18 and 24. Two hundred and forty-two households had at least one person over the age of 24 (31 percent). CMHA's 2021 count reported 82 sheltered and 93 unsheltered populations in North County (Montachusett region).

There were three households (eight people) with at least one adult and one child; four people were children under 18, and four were adults over 24. CMHA did not count any households with only children under 18 in 2021. Please note that these counts do not include the doubling up of families or couch surfing commonplace among younger homeless individuals; thus, the need for housing assistance may not be accurate. Families of veterans include families where one or both parents are veterans with at least one child. The data shows 103 veterans accounted for - eight in emergency shelters, 86 in transitional shelters, and nine unsheltered.

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

White populations see the highest rates of homelessness due to the demographic make-up of the region (76 percent of PIT Count). Most White homeless individuals were housed in emergency shelters (622 people, or 59 percent). Sixteen percent of White homeless individuals were unsheltered. Forty percent

was Hispanic/Latino (556 individuals). CMHA reported 54 sheltered and 64 unsheltered White homeless individuals in 2021; 18 of the sheltered individuals and 27 of the unsheltered were Hispanic. The second highest rates were among Black populations at 21 percent. Seventy percent of Black individuals were in emergency shelters, and four percent were unsheltered. CMHA counted eleven sheltered and fourteen unsheltered Black individuals in their more recent 2021 data. Of the fourteen Asian individuals, 64 percent were in emergency shelters, and 14 percent were unsheltered. CMHA counted one sheltered and four unsheltered Asians. All of the six American Indian and Alaskan Natives were in emergency shelters. CMHA counted three unsheltered American Indians and Alaskan Natives. One Pacific Islander/Native Hawaiian person was in an emergency shelter, and one was unsheltered. CMHA counted one unsheltered Pacific Islander/Native Hawaiian. Of the 27 multi-racial individuals, 67 percent were in emergency shelters and seven percent were unsheltered. CMHA counted one sheltered and eight unsheltered multi-racial people. Based on the data, homeless minorities were sheltered at the same rate as the general population.

The Consortium cross-references PIT data with Community Health Connections (CHC) data, a nonprofit community health center organization providing comprehensive outpatient services to families and individuals in North Central Massachusetts. According to available data, CHC served 29,200 homeless and publicly housed patients in 2020; 9,594 (32.8 percent) of patients resided in Fitchburg, 14,310 (49 percent) qualified for Public Housing Primary Care (PHPC), 3,688 (12.6 percent) qualified for Health Care for the Homeless (HCH), and 12,318 (42 percent) reported to be 100 to 200 percent below the Federal Poverty Guidelines.

### **Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.**

Sixty-one percent of homeless people were in emergency shelters during the PIT Count (862 out of 1,401), and 13 percent were unsheltered (189 people). Seventy-five percent of those in emergency shelters (649 people) were from households with at least one adult and one child. Ten percent of the sheltered population recorded by CMHA was someone in a household with at least one adult and one child (there were no unsheltered households with at least one adult and one child counted by CMHA).

Fifty-five percent (474 people) were female. Women make up 34 percent of individuals in shelters and 39 percent in Transitional Housing. Women were 34 percent of the CMHA's sheltered count and 44 percent of the unsheltered count. Two hundred and seventy-one homeless people (19 percent) were in transitional housing during the PIT; 42 had a least one child (15 percent). Men were 60 percent of homeless individuals in Transitional Housing. Overall, 13 percent of individuals were unsheltered, the majority being male (65 percent), White (76 percent), and without children (98 percent). Of sheltered homeless individuals, 97 were adults with chronic substance use, 45 were DV victims, 93 had a severe mental illness, eight were veterans, 29 were chronically homeless, and five were adults with HIV/AIDS. CMHA's records of those sheltered indicate 16 people with a severe mental illness, 21 with substance abuse issues, and three with HIV/AIDS. Of the unsheltered, twelve were unaccompanied youth, with one under 18; nine were veterans, 59 were chronically homeless, 95 were adults with serious mental illness,

and 62 were adults with chronic substance abuse. CMHA's records of the unsheltered indicate 61 people with a severe mental illness, 55 with substance abuse issues, six with HIV/AIDS, and 33 DV victims.

### **Discussion:**

One of the key takeaways is that unsheltered homeless individuals often fit into multiple subpopulation categories and require significant support to transition out of their situations. It is common for unsheltered individuals to be affected by severe mental illness and chronic substance abuse. The threat of homelessness always lingers for those considered extremely low-income. The Consortium needs to continue encouraging efforts to grow employment opportunities and job training, raising household incomes so those on the cusp can improve their situation and avoid increasing housing costs.

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

### **Introduction**

The Consortium's special needs populations include the elderly, frail elderly, the physically and developmentally disabled, the severely mentally ill, those suffering from addiction, veterans, and those with HIV/AIDS and their families. This section provides estimates of the number of people that require supportive housing services.

### **Describe the characteristics of special needs populations in your community:**

Please note there is limited available data for victims of domestic violence and veterans.

#### **Elderly and Frail Elderly**

The Consortium's largest special needs population is the elderly, with those 65+ making up approximately 15 % of the population. The County's elderly population is 15 percent, and the state's is 16 percent. Of those 65+, 45 % are older than 75. The ACS state that 22 % of households in both cities are seniors living alone. Seniors living alone are 28 % of all nonfamily renter households and 36 % of nonfamily ownership households.

#### **Severe Mental Illness**

Mental illness is a growing issue across Massachusetts and in Worcester County. There were roughly 29,000 people served by the Department of Mental Health (DMH) in 2019, including 25,861 adults. There were 6,741 receiving case management in the same year. According to the Substance Abuse and Mental Health Services Administration, 222,000 U.S adults 18 or older (4.2 % of all adults) in 2013–2014 had a severe mental illness in the year prior. According to the Director of Quality Management Central MA and the North County Department of Mental Health Site Director, 171 people in Fitchburg and 116 in Leominster currently receive state-funded services for severe mental health problems. The number of mentally ill individuals in the lists below are based on Census data:

- Adults (19-64) with severe mental illness (5.7 percent)
- Leominster: 2,372
- Fitchburg: 2,320
- Elders (65+) with severe mental illness (1.57 percent)
- Leominster: 653
- Fitchburg: 639

#### **Persons with Disabilities**

The non-institutionalized, disabled adult population is 16 % in Fitchburg and 13 % in Leominster, compared to 12 % of the state. There are 11,599 individuals with a disability in the Consortium. Of those, .4 % are under the age of 5, 8.1 % are between 5 and 17, 7.7 % are between 18-34, 16.3 % are 35-64, 22.4 % are 65-74, and 45.1 % are older than 75. There are 4,439 people with an independent living difficulty in the Consortium, 2,590 with a self-care difficulty, 5,432 with ambulatory difficulty, 6,154 with cognitive difficulty, 1,737 with vision difficulty, and 2,495 with hearing difficulty. For those under 18, .3 % have two or more types of disability. The Director of Policy and Strategic Initiatives/Ombudsman of the MA Commission for the Blind (MCB) reports 222 legally blind residents in Fitchburg and 223 in Leominster. Unfortunately, data was unavailable from the Area Director of the MA Department of Developmental Services regarding Fitchburg and Leominster individuals receiving services.

### Substance Abuse

According to the Department of Public Health Bureau of Substance Abuse Services, there were 849 admissions for primary substance use in Fitchburg in 2017. Fifty-nine % of admissions were unemployed, 34.1 % were homeless, and 74 % had a high school diploma/GED or less. In Leominster, there were 622 admissions - 21 % were homeless, 58 % were unemployed, and 74 % also had a high school diploma/GED or less. Over half of admissions in both cities were related to heroin.

### People with HIV/AIDS

The Department of Public Health's Bureau of Infectious Disease and Laboratory Sciences reports 166 people living with HIV/AIDS in Fitchburg and 100 in Leominster as of December 2019. There are 23,291 individuals living with HIV/AIDS in Massachusetts. The income status of these individuals is unknown. However, many are concentrated in cities where services are available. Available housing for those with HIV/AIDS and their families is limited across the Consortium and the County.

## **What are the housing and supportive service needs of these populations and how are these needs determined?**

Non-homeless special needs populations require housing and services. Information was compiled with data from the CPP. According to the HIC, there are 46 family units, 139 family beds, 257 adult beds, and 397 year-round transitional housing beds. There are 342 family units, 922 family beds, 601 adult-only beds, and 1,523 year-round PSH beds. There are also:

- 220 PSH for the chronically homeless
- 279 PSH beds for veterans
- 131 Transitional Housing beds for veterans
- 7 Rapid Rehousing beds for youth
- 79 Transitional Housing youth beds in the CoC.



CMHA reported 405 units and 594 beds of transitional, safe haven, PSH and Rapid Rehousing. There are 285 units with supportive service funding, 90% are Housing First, and 58% are CH-Dedicated, CH-Prioritized, or Dedicated PLUS Beds. CMHA reported 384 PSH units and 537 beds; 64% being CH-Dedicated, CH-Prioritized, or Dedicated PLUS, 69% had supportive service funding, and 94% being Housing First. Needs for the (frail) elderly are in-home services, home repairs, health services, and assisted living, nursing and group homes. Fitchburg has 1 assisted living facility (the Gables), not for LMI households. Another development is a 9 bedroom, monitored facility not considered assisted living. Housing with services is difficult to offer without guaranteed funding or subsidy.

There is a mismatch b/t people with mental illness and those receiving funded services. While not all with mental illness are LMI, it disproportionately affects LMI households. These households cannot afford it or have limited access. Data came from providers and databases. There is a need for sober facilities with case management and counseling, particularly for youth. Admissions outweigh year-round transitional and PSH available. Data shows more are seeking treatment for substances and housing must keep pace. There are 25 DMH units on Fitchburg's SHI and 14 units on Leominster's SHI.

Most of the disabled population needs supervised housing, transitional options, shelters, and disability features. CPP feedback indicates a need for full-time care for those with developmental disabilities. Those with disabilities need housing near jobs, transportation, and respite. There are 9 units subsidized by EOHHS and 61 subsidized by DDS on Fitchburg's SHI. 28 units are subsidized by EOHHS and 67 by DDS on Leominster's SHI. Examples of similar efforts include SHINE in Leominster, which deals with mental illness in children/young adults.

The only provider for those with HIV/AIDS is MOC. MOC offers supportive housing, case management, and prevention, including housing search, TBRA, and utility assistance, referrals, and eviction prevention. There is a need for these services, along with DV, veteran, and special needs populations support. According to Leominster's SHI, the DVA has 10 units of subsidized housing.

### **Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:**

Fitchburg and Leominster are not HOPWA grantees. There is limited data on people with HIV/AIDS and their families in the Metropolitan Statistical Area. The Boston Eligible Metropolitan Statistical Area (EMSA) receives funding for HIV/AIDS-related services in seven Massachusetts counties and three New Hampshire counties. The Consortium is located within this EMSA but does not seek funding for an Eligible Metropolitan Statistical Area.

### **Discussion:**

Non-homeless special needs populations are more likely to have experienced or experience homelessness in their lifetimes. These populations have specific needs linked to service requirements, with some relying on these services to remain housed. The Consortium continues to

support initiatives, partnerships, and projects that secure adequate, safe, and affordable housing with on-site or nearby services such as Project-Based Section 8 (PBA) and tenant-based rental assistance (TBRA). The Consortium supplements these programs by allocating HOME funds for affordable housing development and rehabilitation where possible.

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

### **Describe the jurisdiction's need for Public Facilities:**

Fitchburg is an old industrial city with aging infrastructure and facilities. Focus groups for this Consolidated Plan highlighted areas that require improvement: aging park facilities, the YMCA's athletic facilities, sidewalks and street infrastructure, energy efficiency in public buildings, broadband expansion, the lack of handicap accessibility, and increasing access and availability of green space in Environmental Justice (EJ) Census tracts. Investment in accessible recreation, such as playgrounds and parks in all neighborhoods, remains a priority. Multi-modal transportation that is safe and promotes health remain citywide needs as well. The City understands the condition of its facilities affects its vitality and ability to attract new residents. Because of this, capital facilities and infrastructure improvements are goals of other planning efforts, including the Master Plan, the 2018 Economic Development Strategic Plan, Vision 2020, and the Downtown Urban Revitalization Plan. Fitchburg will accomplish these goals by promoting sustainability and resiliency and coordinating siting to enhance the quality of life.

Several public buildings need rehabilitation; however, costs can be prohibitive. These buildings include the police station, homeless shelters, PHA properties, and DPW properties. As stated throughout this assessment, affordable housing for various household types, ages, and income levels is a pervasive need. The Community Needs Survey identified "high needs" for homeless shelters/facilities and youth centers. A summary of the survey is below. Public facilities remain important to the community despite the impacts of COVID-19; this was particularly true for the YMCA and the Boys and Girls Club. The pandemic, the high cost of construction and demolition, and limited staff are barriers to improvement. Staff continue to apply for grants while keeping up with local demand.

[See Appendix Figure NA-50.1]

### **How were these needs determined?**

The Needs Assessment survey, public hearings, Advisory Committee meetings, focus groups, and regular consultations with City staff were conducted for the non-housing community development section of the Plan. Consultant's conducted supplementary phone, e-mail, and in-person discussions for the Needs Assessment. Information during public outreach identified those populations/services/facilities most in need.

### **Describe the jurisdiction's need for Public Improvements:**

There has been progress over the years in terms of public improvements. However, the City understands more work is required, particularly concerning streets and sidewalks. Fitchburg's topography is challenging for street and sidewalk maintenance because the City is in a hilly region. The age of local infrastructure also contributes to deteriorated conditions. Street and sidewalks, traffic safety, and street

beautification were at the forefront of CPP discussions. Major corridors lack plantings, lighting, street furniture, and appeal, appearing lifeless and unsafe. Barrier removal remains a high priority for sidewalks. The City continues to target the areas of highest need with the Disability Commission's assistance. Streets impact the operation of other important infrastructure, including storm water, sewer, and drainage. Current street/sidewalk conditions are unsafe, adversely affect drainage in storms, and ultimately cause flooding and related issues. Public transportation is another need. Without an efficient public transit system, residents are limited in employment options and are at-risk of becoming financially strained by car ownership. Most cost-burdened households are unable to take on that added expense. A transportation system with appropriate connections will efficiently serve the City and region.

Older parts of the City with sanitary/storm sewers have released sewage into the Nashua River, contributing to flooding and back-ups. Fitchburg complies with federal EPA orders to address this issue, but financing is difficult, costly, and slows progress. Water/sewer improvement and expansion are major needs as the City tries to attract more commercial and residential development. The City has capacity, but the distribution system is old and requires ongoing replacements. Improvements would allow for density, attract developers, and reduce development prices. The City recognizes that public improvements must focus on capacity, growth, transportation, and streets/sidewalks over the next five years to attract critical mass to the area.

The Community Needs Survey for this Consolidated Plan identified street improvements, sidewalk repairs, and alternative energy infrastructure as "high needs." A summary of survey results are below. Public improvements needed in the region include hazard mitigation and adaptation in the built environment; resilient, long-term infrastructure; renewable energy development and delivery; and sustainable waste management that protects health, safety and the environment and supports the economy.

### **How were these needs determined?**

The Needs Assessment survey, public hearings, Advisory Committee meetings, focus groups, and regular consultations with City staff were conducted for the non-housing community development section of the Plan. Consultant's conducted supplementary phone, e-mail, and in-person discussions for the Needs Assessment. Information during public outreach identified those populations/services/facilities most in need.

### **Describe the jurisdiction's need for Public Services:**

Providing public services is a challenge in Fitchburg due to the lack of jobs, competitive wages, affordable housing, and transportation for those staffing in the field. The City is somewhat isolated and

considered inaccessible according to focus group feedback. Employment training and affordable housing are needed to staff these positions and allow people to live in the region. As seen during the CPP, Fitchburg's LMI, minority, and special needs populations have ongoing service needs. Special needs populations who require access to affordable services include the homeless, chronically homeless, at-risk youth, the disabled, the elderly, those suffering from substance abuse, veterans, DV victims, and those with HIV/AIDS. The dominant needs are affordable housing, childcare, mental health counseling, case management, youth and teen programming, job training, translation services, and substance abuse services. According to recent data published by the Department of Public Health and the Bureau of Substance Addiction Services, there were 849 admissions to substance abuse treatment facilities in 2017 - an 18 percent increase in about a decade. Those under 25 accounted for 18 percent of admissions. A lack of timely access to mental health services, a deficit in training, and gaps in treatment are the top contributors to homelessness and mental health issues, often interrelated and worsened when untreated.

Social service funding is difficult due to the 15 percent cap on spending and yearly funding decreases. These conditions undermine the City's ability to keep up with the demand. Meanwhile, transience, squatting, substance abuse, and mental health stress municipal services and public safety. As mentioned in this plan's homelessness sections, there is a need for housing assistance with supportive services for the homeless and non-homeless special needs groups trying to secure housing and remain housed, including youth-specific services. The needs persist for those moving into permanent housing and out of homelessness, Rapid Rehousing, and Transitional Housing, which already face limited financial capacity. Affordable rental development is the solution the City will advocate for over the next five years.

According to the Community Needs Survey and focus groups, other unmet needs include youth/childcare, services for DV victims, and health services. Crime awareness/prevention such as drug enforcement will continue. Failure to address these compounding issues has caused many to move out of the City, lower property values, and reduce tax revenue. This trend also has adverse impacts on the public school system. The City will apply CDBG funding to these issues and economic development initiatives that assist LMI populations, raise household incomes, increase opportunities for growth, and promote the target area's vitality. Survey results for public service needs are below.

[See Appendix for Figure NA-50.3]

### **How were these needs determined?**

The Needs Assessment survey, public hearings, Advisory Committee meetings, focus groups, and regular consultations with City staff were conducted for the non-housing community development section of the Plan. Consultant's conducted supplementary phone, e-mail, and in-person discussions for the Needs Assessment. Information during public outreach identified those populations/services/facilities most in need.

# Housing Market Analysis

## MA-05 Overview

### Housing Market Analysis Overview:

Population growth, income levels, and proximity to employment and amenities influence housing demand in Fitchburg-Leominster Consortium. Each has remained stagnant in Fitchburg as the population has grown by 1 percent since 2009 (see Table 5). The City continues to contend with a large gap between wages and housing costs, subsequently affecting the labor force and the level of service provision for populations in need. Those who can secure employment earn less than their counterparts in other parts of the state.

According to the 2018 Economic Development Strategic Plan (Strategic Plan), local jobs declined by 10 percent between 2001 and 2015. Among the report's comparison communities, Fitchburg had the highest share of residents living in poverty, including seniors and children. Fitchburg also had a higher unemployment rate than the comparison communities. The City has trouble attracting and retaining talent because wages are so low. In addition to low wages paid by local employers, geographic isolation and lack of transportation, affordable housing, and economic opportunity inhibit workers and their families from locating there. Findings from the last Consolidated Plan and other planning efforts indicate that residents have fewer options to find higher-wage employment. Only the highest-paid employees in the major employment sectors can afford to own a home.

Positions in the mental health and social work fields (e.g., clinicians, behavioral analysts, home health aides, and mental health counselors) are in high demand due to the City's aging population, homelessness, problems with substance abuse, etc. It was found that Fitchburg is underserved in the Food Service & Drinking sector alone by a margin of \$50 million in unmet demand. Median household incomes have not grown at the same rate as housing costs; incomes increased three percent (see Table 5) since 2015 compared to a 27 percent increase in median sales prices. While jobs may have been added to the regional economy, household wealth remains stagnant. To meet various needs at different income levels, the Consortium must have a diverse housing supply in good condition and a range of price levels.

Thirty-nine percent of Consortium households have at least one of the four housing problems: incomplete kitchen facilities, incomplete plumbing facilities, more than one person per room, and a cost burden greater than 30 percent. The region's most common housing problem is cost burden, affecting 39 percent of Fitchburg households and 33 percent of Leominster households.

### Additional Text

Ten percent of Fitchburg households and 14 percent of Leominster households are considered severely cost burdened. When analyzed by tenure, the data is striking - 45 percent of renters are cost-burdened compared to 28 percent of homeowners. Renters, low- to moderate-income (LMI) households, households with a disabled householder, and single-person households have higher cost-burden rates than the general population due to less financial security, lower-wage employment, lack of transportation, and the lack of affordable housing. Cost burden maps for both communities are at the end of this section.

There are 31,795 households and 34,300 housing units in the Consortium. Thirty-six percent of units were built before 1940, and 74 percent built before 1980. The rental stock is slightly older than the ownership stock - 38 percent of rental units were constructed before 1940 compared to 30 percent of all ownership units. The median year for housing construction in the Consortium was 1940. This is considered old compared to most Massachusetts cities and towns. Older homes require more maintenance and upkeep and, therefore, higher housing expenditures. Sale prices of older homes in the region do not always reflect the condition, with many homes selling for much more than they are worth. The chart below outlines median home values in the Consortium by year built.

Fitchburg's CDBG Target Area is in and around Downtown. The Target Area has high concentrations of housing problems. Contributing factors include large numbers of older housing and households with income near/below the poverty level. Concurrently, Census Tract 7106 (in the Target Area) has the highest vacancy rate in the City at 21 percent. The Great Recession had an enormous toll on the City, causing drastic declines in housing values that left many properties "underwater," i.e., worth less than the mortgages owed by owners. The Downtown core was the hardest hit, and according to the Economic Development Strategic Plan, recovery has been slow. Over a quarter of properties remain underwater. Many are vacant, bank-owned real estate or are abandoned units in disrepair. These conditions discourage reinvestment and development in the City. Another challenge is the price and the frequency of two- and three-family home sales. The prices of small multifamily structures have fallen by 45 percent since the 2006 pre-recession peak. Only 35 of these structures were sold between 2011 and 2016. The Consortium is actively marketing to buyers and tenants priced out of greater Boston Metro and potentially moving northwest.

## **Additional Text 2**

The Consolidated Plan's priorities are to improve the quality and diversity of housing for a variety of incomes but, most importantly, for those in need. Other top priorities include providing opportunities for those at risk of homelessness or transitioning out of homelessness. The Consortium recognizes that providing transportation, affordable daycare, rental assistance, energy-efficient affordable housing, and other services will help achieve these priorities.

[See Appendix for Figure MA-05.1]





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

### Introduction

There are 31,795 households and 34,300 housing units in the Consortium; Leominster has about 1,800 more housing units. Leominster and Fitchburg's housing characteristics differ for two communities in such close proximity. In Fitchburg, 42 percent of housing is detached single-family homes, versus 46 percent in Leominster. According to more recent ACS estimates, the state figure is 52 percent and 57 percent for Worcester County. Of the Consortium's 2,505 vacant units, 64 percent are in Fitchburg.

Despite offering more multifamily options, the CPP identified a need for more housing availability and diversity, particularly LMI households in Fitchburg. Fitchburg has a smaller percentage of rental and ownership studios (11 percent) and three-bedroom rentals (24 percent). The limited supply further inhibits individuals and families with children from relocating to the area. The City's Chapter 40B Subsidized Housing Inventory (SHI) does not meet affordable housing needs. Many extremely low-income households cannot access housing on the SHI due to income thresholds, local preference, wait times, and other regulatory and administrative barriers. Many households not searching for a single-family home have few options and are forced to afford what is left.

Interested homeowners and renters are limited when locating to the area due to the foreclosure crisis, at-risk structures, and building/health code violations. Fitchburg continues to struggle from the fallout of the crisis more than a decade ago. Data from the City's Vacant and/or Foreclosing Property Registration states there are sixty properties in various states of foreclosure and vacancy. Ten vacant properties are either foreclosed or sitting idly in 2021. In 2020, there were 87 properties on the registry; nine were vacant, twelve were foreclosed and vacant, and twenty-eight were occupied properties in foreclosure. The Board of Health performed 783 unit inspections and 1,675 dwelling inspections in 2020, finding 4,207 violations and correcting 3,399. Of the inspected units, nine were vacant, and six deemed inaccessible

### All residential properties by number of units

Property Type	Number	%
1-unit detached structure	14,640	42%
1-unit, attached structure	2,125	6%
2-4 units	9,705	28%
5-19 units	4,955	14%
20 or more units	3,070	9%
Mobile Home, boat, RV, van, etc	335	1%
<b>Total</b>	<b>34,830</b>	<b>100%</b>

Table 27 – Residential Properties by Unit Number

Data Source: 2011-2015 ACS

## Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	355	2%	1,595	11%
1 bedroom	640	4%	3,630	25%
2 bedrooms	4,255	25%	5,725	40%
3 or more bedrooms	12,040	70%	3,375	24%
<b>Total</b>	<b>17,290</b>	<b>101%</b>	<b>14,325</b>	<b>100%</b>

**Table 28 – Unit Size by Tenure**

Data Source: 2011-2015 ACS

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

The Commonwealth, through the Department of Housing and Community Development (DHCD), maintains the Chapter 40B SHI. The SHI contains ownership and rental units. There are 2,950 SHI units assisted with federal, state, and local programs in the Consortium. This can include public housing administered by PHAs, project-based, and tenant-based units. DHCD subsidizes 1,437 units. Units on the SHI are intended to meet the needs of the LMI residents - households with incomes at or below 80 percent of the Area Median Income (AMI). In Fitchburg, 9.27 percent of total occupied housing units are on the SHI, compared to 7.69 percent in Leominster. Massachusetts mandates under MGL Chapter 40B that at least 10 percent of year-round housing units must be considered affordable and listed on a community's SHI. Several other subsidized units with affordability restrictions may exist in both cities. However, if they do not have a long-term deed restriction (minimum of 30 years), they will make it onto the SHI as required under MGL Chapter 40B. A breakdown of the SHI for both cities is below.

[See Appendix for Figure MA-10.2]

The Fitchburg Housing Authority (FHA) has 302 elderly units, 41 non-elderly disabled units, and 219 family units. The Leominster Housing Authority (LHA) has 341 elderly/young disabled units and 73 family units. LMI households occupy the Consortium's public housing units, but the need persists for this demographic, according to PHA staff. There are 8,766 family applicants, 715 elderly applicants, 180 applicants for congregate elderly housing, and 624 Alternative Housing Voucher Program (AHVP) applicants for state-aided public housing on FHA's waiting list. According to LHA staff, many elderly applicants are looking for two-bedroom units for medical purposes or to live with their spouses. Staff also discussed the need for more family handicapped units and landlords willing to work with Section 8. LHA's waiting list has 988 elderly, 1,071 young disabled, and 5,765 family applicants. There are 208,703 applicants on the Centralized Waiting List.

The Consortium anticipates assisting seven homeowners through Fitchburg's Homeowner Rehabilitation Program, or 35 total households, throughout the Consolidated Plan. The City usually has tenant units as

well, averaging three rentals in owner-occupied properties. Staff strives to fund: (1) one sizeable rental development per year with between two and four units funded through the HOME Program; and (2) one homebuyer development through nonprofit partnerships. Leominster anticipates rehabilitating ten units per year through the Housing Rehabilitation Program. Based on these numbers, there will be about 85 units rehabilitated in the Consortium by 2026.

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

The Community and Economic Development Assistance Corporation (CEDAC) reports that there are no units at risk on the affordable housing inventory in Fitchburg. CEDAC reports 45 units are at risk in Leominster. 34 Units can be at risk for several reasons, including expiring Section 8 contracts, expiring deed restrictions, or financing coming to terms. A benefit of Fitchburg's rental market is that many landlords may extend affordability agreements to receive guaranteed rent payments.

**Does the availability of housing units meet the needs of the population?**

There are 15,345 LMI households in the Consortium according to CHAS data - 5,280 with incomes of 51-80 percent AMI (17 percent of total households), 4,745 with incomes of 31-50 percent AMI (15 percent), and 5,320 with incomes 30 percent or less of AMI (17 percent). Therefore, the 2,950 SHI units do not meet the affordable housing needs of Consortium residents today. There are 9,560 cost burdened LMI households (62 percent of LMI households). Of this group, 5,180 households are severely cost-burdened (34 percent of LMI households). Despite the Consortium's relative affordability compared to the state, progress toward meeting affordable housing needs is hindered by the age of the housing, low property values, the number of substandard units, and long waiting lists. There are 8,766 households on the FHA's waiting list, and 5,765 are on the LHA's waiting list for family units. There are 1,842 non-elderly households (404 of which are congregate non-elderly) and 895 elderly households (180 congregate) on FHA's waiting list. There are 1,071 disabled households, 988 elderly households, and 5,765 households waiting for a 2 or 3 bedroom unit on the LHA's waiting list.

**Describe the need for specific types of housing:**

The Consortium needs modern, safe, affordable housing for the extremely low-income. As referenced in PHA data, both cities lack subsidized units for families, the elderly, and the disabled. The figures below compare occupation patterns by household size in the Consortium. Occupation rates drop for owners and renters when moving from two- to three-person households, indicating many one- and two-person households. Compared to ACS data of persons per room, renters are more likely to have 1.51 to 2 occupants per room compared to homeowners. Bedroom data confirms that 17 percent of the housing stock are one-bedrooms and studios, and 14 percent have four or more bedrooms. Increasing the supply of multi-bedroom rentals would meet the need for poorer families, while increasing the supply of one-bedrooms would meet a need for poorer individuals, the elderly, and younger populations.

[See Appendix for Figure MA-10.3]

As the elderly population downsizes, households require a greater supply of disability-friendly affordable units. Needs must be met for both, as 11,641 people in the Consortium are 65 and older. Of those 65 and older, 32 percent are disabled. There are 11,599 people in both cities with a disability – 6,307 in Fitchburg (16 percent of the total population) and 5,292 (13 percent of the total population) in Leominster. The outreach process identified housing for elders, accessible housing, and housing with supportive services, particularly in public housing. Of Consortium owners living alone, 45 percent are over 65. Twenty-eight percent of renters living alone are over 65. Elders, the disabled, and renters are likely to have lower incomes and experience barriers to access to high-quality housing.

Householders living alone are 12.8 percent of owner-occupied households and 16.2 percent of renter occupied households in the Consortium. There are 9,201 householders living alone, or 29 percent of “nonfamily” households. Per HUD’s income limits, a one-person household with income at or below \$50,200 is considered low-income (80 percent AMI). The Consortium’s median gross rent is \$990, and the median monthly housing cost is \$1,171. For single householders, funds are limited for other expenses after rent and utilities, e.g., food, transportation, and healthcare. More affordable options will serve the growing need, attract younger populations, help downsize, and provide reasonably priced options for employees in the local economy.

According to the CPP, which included focus groups with providers to the homeless/at-risk and other LMI populations, the greatest needs are for affordable rentals for extremely and very-low-income groups. There is also a gap in transitional housing with services for special needs populations such as domestic violence (DV) victims, people recovering from addiction, and people transitioning out of homelessness. Survey responses reiterated a lack of affordable options and the need for rental assistance, energy-efficient housing, transit-oriented development, and rehabilitation/repair. In Fitchburg, building and health code enforcement for substandard and vacant housing is a major priority for bringing more units into the market.

## **Discussion**

The age of housing, the foreclosure crisis, and home values have left Fitchburg with deferred maintenance and abandonment issues. Housing diversity and availability that meets livability standards must be reevaluated. There is a mismatch between the LMI needs and what is available and affordable. Old, detached single-family homes dominate the market. A diversified stock will make housing accessible to more and increase the demand to live and work there. It is important to address affordable housing demand when increasing the supply, meaning buyers/renters should choose from options ready for occupancy, avoiding legal snafus associated with foreclosures and vacancies.

The SHI inadequately services LMI populations. There is a concentration of units in Downtown Fitchburg while other parts of the City house a fraction of total units. Both cities do not currently meet the 10% threshold under MGL Chapter 40B. Fitchburg is constrained by limited funding when attempting to change the quality and supply of housing. Nevertheless, the Consortium funds affordable

homeowner/rental projects. Fitchburg's LMI populations are concentrated in the CDBG Strategy Area. The City adheres to 25% rental affordability in this area, avoiding concentration of poverty and promoting mixed-income. Fitchburg funds home development, rehabilitation, and repair to produce affordable units.

The City offers the Buy It, Fix It Homebuyer Rehabilitation Program, a partnership with banks to offer loans for families buying/repairing a home in Fitchburg. The program is only for income-qualified applicants. A setback of the program is homes often affordable to buyers require more in repairs than their values. It is expected that Fitchburg's Homeowner Rehabilitation Program will assist 35 homeowners. Each year, the City strives for 1 larger rental development, with 2-4 HOME units. They strive for 1 homebuyer development through nonprofit partners. Leominster anticipates rehabilitating 10 units per year through their Housing Rehabilitation Program.

Fitchburg has the Mayor's NICE Task Force. The Task Force is a collaborative effort between City departments to address problem properties. Staff meets bimonthly to discuss properties identified as problematic due to fire damage, vacancy/abandonment, foreclosure, blight, etc. Staff develops strategies to address properties and follow up with ongoing strategies. Some tools used by the Task Force include code enforcement inspections, working with owners, receivership (appointing an entity as a receiver/manager of the property via the housing court to correct the deficiencies that make the property a problem), and as a last resort, demolition.

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

### Introduction

This section's purpose is to evaluate household income and market data to understand the financial characteristics of the Consortium's housing and households - the first step to understanding if affordable housing is truly "affordable." Multiple factors, such as population demographics, geography, environmental limitations, and public infrastructure, are considered when analyzing housing costs. The analysis informs short- and long-term housing decisions, particularly regarding supply management and distribution. The data shows that renters have greater financial burdens than homeowners due to their lower incomes. Meanwhile, median rents continue to increase. The cost of housing in the Consortium has increased significantly since 2010. As seen in the Needs Assessment, the median sales price of a home in the Consortium is \$265,000, showing that the median home value reported in HUD's prepopulated tables does not reflect conditions today.

Both communities lost value during the 2008 Great Recession foreclosure crisis over a decade ago (seen in Table 33). Although the prepopulated tables' 2015 ACS estimates indicate positive market activity, it does not outweigh lost and unrecovered values since the Great Recession. Other trends seen over this time frame include:

- Consortium households saw a 4 percent increase in housing costs – from \$1,030 to \$1,073.
- There was a 6 percent increase in Consortium households with a mortgage.
- The cost burden rate decreased among homeowners with mortgages in all income groups.
- There was a 3 percent decrease in median gross rent as a percentage of household income.

The number of renters with contract rents rose 17 percent between 2010 and 2015. The median contract rent rose by 4 percent over the same period. Contract rent provides insight regarding monthly housing expenses; it is the monthly rent agreed to regardless of furnishings, utilities, fees, meals, or services that may be included. Between 2010 and 2015, there was a 6 percent increase in contract rents less than \$500; a 7 percent increase in rents ranging from \$501-\$800; a 41 percent increase in rents from \$801- \$1000; and a 6 percent increase in rents over \$1,001. Figure MA-15.1 summarizes the most current ACS estimates to better understand housing costs as a percentage of renter incomes. There are many cost burdened renters in the deeply affordable income brackets. Many renters pay more than 30 percent of their income for housing up until the \$50,000+ income brackets.

[See Appendix for Figure MA-15.1]

### Cost of Housing

	Base Year: 2009	Most Recent Year: 2015	% Change
Median Home Value	234,155	200,832	(14%)
Median Contract Rent	705	736	4%

Table 29 – Cost of Housing

**Alternate Data Source Name:**

Cost of Housing ACS Data

**Data Source Comments:**

<b>Rent Paid</b>	<b>Number</b>	<b>%</b>
Less than \$500	3,145	22.0%
\$500-999	9,190	64.1%
\$1,000-1,499	1,765	12.3%
\$1,500-1,999	170	1.2%
\$2,000 or more	30	0.2%
<b>Total</b>	<b>14,300</b>	<b>99.8%</b>

**Table 30 - Rent Paid****Data Source:** 2011-2015 ACS**Housing Affordability**

<b>% Units affordable to Households earning</b>	<b>Renter</b>	<b>Owner</b>
30% HAMFI	1,770	No Data
50% HAMFI	4,725	765
80% HAMFI	10,375	3,555
100% HAMFI	No Data	5,949
<b>Total</b>	<b>16,870</b>	<b>10,269</b>

**Table 31 – Housing Affordability****Data Source:** 2011-2015 CHAS**Monthly Rent**

<b>Monthly Rent (\$)</b>	<b>Efficiency (no bedroom)</b>	<b>1 Bedroom</b>	<b>2 Bedroom</b>	<b>3 Bedroom</b>	<b>4 Bedroom</b>
Fair Market Rent	826	832	1,096	1,380	1,491
High HOME Rent	826	832	1,096	1,380	1,491
Low HOME Rent	776	831	998	1,153	1,286

**Table 32 – Monthly Rent****Data Source:** HUD FMR and HOME Rents**Is there sufficient housing for households at all income levels?**

There is housing available in the Consortium, but it is not sufficient for households at all income levels based on CHAS data. In Leominster, 5,420 households are cost-burdened and 2,385 are severely cost burdened. In Fitchburg, 5,775 households are cost-burdened and 2,935 are severely cost-burdened.

There is a gap between these figures and the number of units on the Subsidized Housing Inventory (SHI) (see Figure MA-10.2) in each community, which can include public housing units. All housing waiting lists are long with average wait times of multiple years. These unit and vouchers lists are growing as more individuals and families struggle to afford to live. The CPP and conversations with housing professionals reinforced significant gaps in the market for LMI people, renters, families, and transitioning out of homelessness. The lack of options is due to the substandard condition of units and the number of potentially available units sitting vacant. Land and construction costs are also expensive, making the creation of new subsidized housing challenging. These challenges require ongoing advocacy and policy implementation, particularly for new development. There also must be ongoing efforts to ensure new development has an affordability component. Most new, market-rate rentals are unaffordable to LMI populations as developers charge high rents to cover development cost. Subsidies are the only feasible way to meet demand.

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

HUD's tables indicate home values have decreased, but these tables are out of sync with 2022 market conditions. Sale prices have increased significantly in the region and across the state, meaning home values have increased, too. COVID-19, its economic fallout, and the high cost of living in the Boston Metro area have caused more people to move outward to North Central Massachusetts and other suburban areas. The market is steadily becoming more competitive and, therefore, more exclusive and difficult to afford. While the 2015 ACS suggests contract rents have remained stable, more current data from Rentometer shows that rents are much higher. The average rent for a one-bedroom in Leominster is \$940, and \$872 in Fitchburg. If these trends continue, cost-burdened residents will be left with limited options and forced to move to more affordable areas. These trends affect the local economy, regional housing market, and quality of life. Many are at risk of being priced out and could experience foreclosure, eviction, and gentrification.

### **How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?**

"High" HOME rents and Fair Market rents are identical for all bedroom sizes, according to Table 36. The 2015 ACS estimates found that the Consortium's median contract rent is \$736, while the Fair Market Rent and HOME high rent for a two-bedroom apartment is \$1,096, and the HOME "Low" rent is \$998. More current sales and rent data provide a more accurate depiction of market activity compared to these ACS values. The reality is that rents today exceed Fair Market Rent values, so a more aggressive affordable housing strategy is needed to preserve and produce affordable units. It is also important to remember that rents in Table 36 are allowable rents under program rules; they are not "affordable" rents, per se.

### **Discussion**



Income limits and market trends highlight the need for rental development, repair and rehabilitation, and appropriate demolition where possible. These priorities will be goals in the Program Year 48 Annual Action Plan (AAP). The Consortium has limited HOME and CDBG resources to address concerns, leveraging other resources for further development. Fitchburg will encourage eligible residents on fixed incomes and considered extremely low-income to participate in the Homeowner Rehabilitation Program. The City will also proactively pursue improving housing quality via code enforcement, use CDBG and HOME funds for rehabilitation, and demolish unsuitable housing where needed. The City hopes that these improvements will bolster the market and property values, encourage property owners to invest in their properties, and work with the City to revitalize the area.

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

### **Introduction**

CHAS data show that many Consortium households are experiencing one of the four housing conditions. Historically, having one condition is due to cost burden. Cost burden is largely affected by maintenance and repair costs for older units. As noted in this analysis, most housing in both cities is at least fifty years old. There are 10,290 households not experiencing a housing problem, or 62 percent of households. There are 5,950 experiencing one of the four conditions, or “problems.” Of households experiencing a problem, 56 percent are renters.

Furthermore, CHAS confirms that 3,110 households (19 percent) are experiencing a severe housing problem. Of those experiencing a severe problem, 2,075 are renters (67 percent). Properties priced lower than the median sales price are usually in need of repair. Oppositely, rental units are often priced higher than their condition unless it is ostensibly poor. This phenomenon is possible because of how limited the rental housing supply is compared to the demand.

It is difficult to access data on the condition of Consortium’s vacant units, of which Fitchburg has the majority (64 percent of total vacant units). Vacant units are 7 percent of housing units in both cities (2,505) and present barriers to suitable affordable housing opportunities for LMI populations. As with most occupied housing, many of these units were constructed over fifty years ago and are at risk of lead paint, among other issues. Because ACS estimates are not an accurate reflection of the number of vacant units, this analysis is supplemented by other information.

### **Describe the jurisdiction's definition for "substandard condition" and "substandard condition but suitable for rehabilitation":**

The Consortium defines “standard condition” as the condition of a housing unit that complies with the following standards:

- Section 3 of the Massachusetts State Sanitary Code;
- The most current applicable edition of the Massachusetts Building Code; and
- All other local or state housing codes.

This definition does not preclude the Consortium cities from making repairs to elderly households, accessibility improvements, lead paint abatement, urgent repairs, or exterior upgrades without requiring full code compliance when improvements are program-eligible and consistent with this Consolidated Plan. The term “substandard condition, but suitable for rehabilitation” is defined in this Plan as the condition of a housing unit that fails to meet one or more of the above standards but can be rehabilitated at a reasonable cost. Exceptions to this standard shall include homes with significant historical importance, homes to be made accessible for use by handicapped persons, and homes determined to be of critical importance to an existing strategic neighborhood plan. The Consortium will

match existing materials in new work wherever feasible and utilize standard practices in compliance with existing codes.

It is challenging for Fitchburg to identify vacant properties and properties unsuitable for rehabilitation. The ACS identifies 2,505 vacant units in the Consortium (1,610 in Fitchburg), but this data does not identify vacant units suitable for rehabilitation. Because of this, the City supplements the information with local data sources, including the Vacant and/or Foreclosing Property Registry, the Board of Health's Sanitary Code Inspections database, and the Neighborhood Improvement through Code Enforcement (NICE) Task Force's Troubled Properties list. The Foreclosing Property Registry does not collect information on whether a property is suitable for rehabilitation, but properties on the list for three years are determined to be no longer suitable. The Troubled Properties list contains vacant, blighted properties that present or have incipient public health risks. All properties on this list are unsuitable for rehabilitation. Although it is hard to be exact, Fitchburg does have a high number of less desirable vacant properties with repair needs, potentially beyond their useful life.

### Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	5,065	29%	6,520	46%
With two selected Conditions	165	1%	675	5%
With three selected Conditions	45	0%	8	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	12,010	69%	7,120	50%
<b>Total</b>	<b>17,285</b>	<b>99%</b>	<b>14,323</b>	<b>101%</b>

Table 33 - Condition of Units

Data Source: 2011-2015 ACS

### Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	1,725	10%	810	6%
1980-1999	4,235	24%	2,065	14%
1950-1979	5,490	32%	4,655	33%
Before 1950	5,840	34%	6,805	48%
<b>Total</b>	<b>17,290</b>	<b>100%</b>	<b>14,335</b>	<b>101%</b>

Table 34 – Year Unit Built

Data Source: 2011-2015 CHAS

## Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	11,330	66%	11,460	80%
Housing Units build before 1980 with children present	1,499	9%	800	6%

**Table 35 – Risk of Lead-Based Paint**

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

## Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

**Table 36 - Vacant Units**

**Data Source:** 2005-2009 CHAS

## Describe the need for owner and rental rehabilitation based on the condition of the jurisdiction's housing.

There are 5,950 households experiencing a housing problem - 56 percent renters and 44 percent owners. There are 3,110 households experiencing a severe housing problem – 67 percent renters and 33 percent owners. Most housing is over fifty years old, causing emerging and ongoing housing problems. The median year of ownership housing is 1955, and the median year of rental housing is 1943 in Fitchburg. Leominster's median year for ownership housing is 1966, and 1969 for rental housing. Fitchburg has many units with issues relating to deferred maintenance and, in some cases, long-term vacancy or abandonment. Understanding the need for rehabilitation is difficult based on available data, as one of the "substandard conditions" is cost burden. Based on what the data does tell us, affordability plays a role, and rehabilitation is likely needed for many units. It is challenging for property owners to maintain their housing with other monthly expenses. This is especially true for elderly homeowners on a fixed income, small families with younger children, and minority homeowners disproportionately affected by cost-burden. Absentee landlords, landlords who cannot afford upgrades, or landlords in dispute with tenants regarding rehabilitation exacerbate the problem. Many people are on the waiting lists for both City's rehabilitation programs, as the program remains feasible for many and popular among homeowners. Depending on costs, Fitchburg's Homeowner Rehabilitation Program will assist approximately seven homeowners per year or 35 throughout this Plan.

To understand the extent of vacancy issues in the Consortium, the chart below shows vacancy by type. Fitchburg has more vacant properties, most categorized as "other." This category primarily consists of bank-owned property sitting idly. Fitchburg's oldest housing is the most vulnerable to vacancy, illegal

activity, and hazardous living conditions. This is further evidenced by Board of Health data that reported 4,207 code violations in 2020, with approximately 80 percent corrected. As noted in this analysis, the quality of vacant units is worsened by the lingering impacts of the foreclosure crisis. There are 87 registered properties in various states of foreclosure as of 2020, with 12 sitting vacant.

[See Appendix for Figure MA-20.1]

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

There is no data to confirm the definite number of units with lead-based paint hazards occupied by LMI households. Lead exposure is likely due to the age of the housing stock and the likelihood of LMI individuals and families living in older units. Data confirms 22,790 units in the Consortium built before 1980 (see Table 39). ACS estimates corroborate this, estimating 25,275 (74 percent) were built before 1980. Of households living in older units, there are 2,299 with children present. The table below indicates the screening and prevalence of childhood blood lead levels for children in each City from nine months to four years. Please note 1.7 percent of children tested in Fitchburg had blood capillary lead level results of 5-9 µg/dL in their preliminary screening. One percent of children tested in Leominster had level results of 5-9 µg/dL in their preliminary screening. The Childhood Lead Poisoning Prevention Program defines lead poisoning as a blood lead level ≥10 µg/dL. Five children in Fitchburg (0.4 percent) had a confirmed blood lead specimen ≥10 µg/dL in 2018. There were no children in Leominster with a blood lead level of ≥10 µg/dL. The Department of Public Health's most recent list of High-Risk Communities for Childhood Lead Poisoning shows that Fitchburg remains a high-risk community, with a 3.7 percent incidence rate per 1,000.

[See Appendix for Figure MA-20.2].

The Childhood Lead Poisoning Prevention Program (CLPPP) prevents, screens, diagnoses, and treats lead poisoning. They are active in Fitchburg, educating, conducting outreach, and maintaining a website so anyone can research if a prospective apartment has had a lead inspection. Notwithstanding the reduction in people exposed to lead, this major health hazard still poses a threat to children under six in Fitchburg due to the quantity of older housing units. De-leading can cost up to \$40,000 per unit, depending on the level of contamination and the method of de-leading. This cost is prohibitive for small landlords and LMI homeowners. For these reasons, de-leading remains a high priority of Fitchburg's housing programs. Board of Health officials estimate approximately 30-40 percent of Fitchburg's older rental housing stock, principally occupied by LMI households, is contaminated with lead paint. About 30-40 percent of older single-family homes owned by LMI persons are also at risk of contamination. Although a significant portion of housing was de-leaded in the 1980s and 1990s, it is estimated between 80-90 percent are out of compliance due to lack of maintenance. Fitchburg and Leominster continue to reduce the number of lead-contaminated units by:

- Growing public awareness of the dangers posed by lead paint;

- Increasing code enforcement efforts; and
- Informing rental property owners of concerns over the risk of liability for lead-poisoned children in their units.

Public funding for de-leading comes from several sources, including the CDBG and HOME programs. The City of Fitchburg utilizes funding from the state's "Get the Lead Out" Program through the Massachusetts Housing Finance Agency for homeowners

## **Discussion**

The Consortium has supported rehabilitation and preservation with CDBG and HOME funding in the past; they continue to be goals in this Consolidated Plan. The City addresses lead issues through its Homeowner Repair Program and make referrals to MassHousing's Get the Lead Out Program. Opportunities to partner with other organizations and municipalities with these programs in place are available. A large portion of the housing stock needs repair, especially as it ages. It is cost-effective to preserve units in a region where vacant properties are available for rehabilitation, and developable land is expensive and limited. Rehab funding would also assist the LMI households in the Consortium's older rentals. A goal going forward is to identify various rehabilitation and repair opportunities and compile them into an accessible format for homeowners.

The Montachusett Regional Lead Paint Hazard Control Program is a partnership between the City of Fitchburg, NewVue Communities, Making Opportunity Count, the Montachusett Public Health Network, and the communities of Gardner, Clinton, and Athol. Grants are for LMI owners-occupants and investors who rent to LMI tenants in these four communities. Making Opportunity Count also offers a Childhood Lead Poisoning Prevention Program that provides education and lead poisoning and prevention information. The program connects residents to deleading resources renovating safely and legally. The case management program is a closed referral program for families with children with elevated lead levels. All referrals come through the Department of Public Health.

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

### Introduction

The Fitchburg and Leominster Housing Authorities are the two PHA's providing publicly subsidized housing in the Consortium. The Fitchburg Housing Authority (FHA) owns 521 units and 255 vouchers. The Leominster Housing Authority (LHA) owns 414 units and 399 vouchers. The FHA has 302 elderly units, 41 non-elderly disabled units, and 521 family units. The LHA has 341 elderly/young disabled units and 73 family units. The Consortium has limited public and assisted housing; the current inventory is not enough to meet the affordability needs of the 15,345 extremely-low, very-low, and low-income households in Fitchburg and Leominster. The existing stock is also old, needs maintenance and rehabilitation, and lacks handicap-accessible units. Lastly, landlords have little desire to work with voucher holders. Table 41 is pre-populated with data submitted by housing authorities and compiled by the Public and Indian Housing Information Center (PIC). To accurately reflect the public housing inventory in the Consortium, alternate data from the two PHAs is used throughout this section.

### Totals Number of Units

	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available			99	546			0	0	0
# of accessible units									
<b>*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition</b>									

**Table 37 – Total Number of Units by Program Type**

Data Source: PIC (PIH Information Center)

### Additional Text

*\*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition.*

**Describe the supply of public housing developments:**

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

The public housing supply doesn't meet demand for units today. There is an insufficient supply of accessible units and special purpose vouchers when compared to households on the two waiting lists. Many unable to apply to or stay on the waiting lists have limited options. Most are forced to move to another City or risk homelessness. The CPP reported that if someone indicates they are in an emergency situation, there remain hundreds in front of them on the lists.

Public housing is scored as a higher (inspection score 90 or above) or standard performer (between 60 and 89) based on HUD's Public Housing Assessment System (PHAS). Units below 60 are substandard. PHA's use a 100-point system based on 4 categories:

- PASS (Physical Assessment) – 40 points
- FASS (Financial Assessment) – 25 points
- MASS (Management Assessment) – 25 points
- CFP (Capital Fund Program) – 10 points

The PHAs reported conditions as fair to good; none were substandard (Table 42). The multifamily database (Figure MA-25.1) lists 3 high, 5 standard, and 1 substandard performer. Many units are old and need modifications. Organizations such as MOC work with PHAs to subsidize remediation. Energy efficiency continue where possible to offset tenant expenses. All units passed Housing Quality Standards (HQS) inspections. The FHA's inventory includes:

**Family - 219 units**

- Green Acres - 160 units
- Scattered Site - 11 units
- Canton Valley Ter - 48 units



Elderly - 302 units

- Daniels Heights - 56 units
- Wallace Tower - 130 units
- 50 Day St (CJ Dunkin) – 116 units

State Programs - 43 vouchers

- DHCD MRVP - 26 vouchers
- DHCD AHVP – 19 vouchers

Federal Programs - 210 vouchers

- HUD Section 8 (Housing Choice) - 160 units
- HUD Section 8 (Project Based at Fitchburg Place) - 50 units

The LHA's housing stock includes the following:

- Family - 73 vouchers
- Elderly - 341 vouchers
- Anne O'Connor Village - 40 units
- Laurie DR - 31 units
- LaPierre East - 104 units
- Notre Dame - 50 units
- Sunset Towers - 116 units

State and Federal Programs - 399 Vouchers



## Public Housing Condition

Public Housing Development	Average Inspection Score
Fitchburg Place	96

Table 38 - Public Housing Condition

## Multifamily Physical Inspection Scores

[See Appendix for Figure MA-25.1]

### Describe the restoration and revitalization needs of public housing units in the jurisdiction:

In the Consortium, state and federally-aided public housing have different needs ranging from roofs to ADA-upgrades. Both housing authorities face issues with the following, according to feedback from the CPP:

- Accessibility upgrades for seniors and the disabled;
- Sidewalk repairs and exterior site work;
- Replacing fire alarms, panels and signaling devices; and
- Weatherization improvements.

The LHA reported the following needs in their Capital Improvement Plan:

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

The FHA reported the following needs in their Capital Improvement Plan:

- Parking lot, driveway, and walkway paving;
- Siding, decks, and rails;
- Roof and lighting replacements;
- Accessibility upgrades for seniors and the disabled;
- Equipment replacement and mechanical installations (doors, generators, windows, sprinkler systems, fire alarms, boilers, etc.); and
- Interior and exterior rehabilitation.

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

PHAs submit their strategies for improving their living environments in their five-year capital plans. The plans outline policies, programs, and operations to meet local needs and goals and outline funding needs for capital improvements in the annual budget. Funding to complete all the necessary improvements is usually unavailable, with single line items often being very costly. Both PHAs continue to increase security and lighting at their developments and physically improve the internal and external infrastructure. The needs for each development determine the prioritization of the updates.

**Discussion:**

The public housing stock is not adequate. Repairs to units and construction of new units are required to properly house the Consortium's extremely low, very low, and low-income households. PHA units in need of repair and rehabilitation pose health, safety, and access issues for tenants. While the PHAs and cities to seek alternative funding and resources, affordable housing production remains difficult.

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

### Introduction

This section focuses on the facilities and services that serve the using homeless information provided by the Worcester City and County CoC, HUD's Housing Inventory Counts (HIC), and City staff. Several facilities service the Consortium's homeless and chronically homeless. According to DHCD's most recent monthly report, there were 88 families placed in EA shelter and hotels/motels across the Commonwealth in 2021. The Days Inn in Leominster offered shelter until the operation ceased in December 2015. The program was reinvigorated during COVID-19.

[See Appendix for Figure MA-30.1]

### Facilities Targeted to Homeless Persons

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	843	90	139	423	0
Households with Only Adults	131	90	257	496	0
Chronically Homeless Households	0	0	0	220	0
Veterans	6	0	131	279	0
Unaccompanied Youth	6	0	1	0	0

**Table 39 - Facilities Targeted to Homeless Persons**

Data Source Comments:

### Additional Text - List and describe services and facilities that meet the needs of homeless persons

The CoC administers a Coordinated Entry System (CES) to link vulnerable households with available housing, shelter, and services. The CES has "access points" or organizations with trained staff to conduct assessments and referrals. While certain access points

specialize in particular populations, the CES follows the “No Wrong Door” model for access to CoC and ESG housing and services. No Wrong Door’s policy is that no one will be denied an assessment at any access points. Homeless individuals and families can present at any homeless housing and service provider in the CoC’s geography using a standardized process, from initial engagement to successful housing placement. Households can access the CES at more than forty organizations. Central Massachusetts Housing Alliance (CMHA), the Coordinated Entry Lead Agency, outreaches to agencies throughout Worcester County who currently, or may, interact with homeless or at-risk households before each bi-monthly Coordinated Entry Working Group meeting. The many access points through the No Wrong Door access model ensures access to the CES and improves the quality of information gathered for the following subpopulations: adults without children; adults accompanied by children; unaccompanied youth; veterans; young adults, including parenting young adults; households fleeing or attempting to flee domestic violence/sexual assault/human trafficking; or persons at risk of homelessness. A summary of homeless services and facilities in the Consortium is below. Our Father's House offers emergency shelter, transitional and permanent housing to homeless adults at various Fitchburg locations. According to prior Consolidated Plan data, there are roughly 300 to 350 people served each year. Our Father's House has a Street Outreach Program offering referral information, crisis intervention, case management, and counseling to the unsheltered homeless. They operate an emergency shelter in Downtown Fitchburg, Elizabeth House (for homeless women in recovery), West Street Sober House (for homeless men in recovery), a Community Food Pantry, and seven transitional scattered site apartments in Fitchburg as part of their Transitions at Devens program. They receive Rapid Rehousing funds from HUD specifically for those exiting homelessness. North Star Family Services, Inc. (formerly Montachusett Interfaith Hospitality Network) out of Leominster provides food, clothing, shelter, and case management to homeless families. They have a twenty-bed capacity. According to the Executive Director, they serve anywhere between twelve and twenty families in a non-COVID year, most of which live in Fitchburg or Leominster. LUK, Inc. Crisis Center offers emergency shelter, transitional beds for youth, and scattered site housing. Individuals are offered prevention services, counseling, and placement services. They also have a Street Outreach Program. LUK serves over 3,700 children and adults in the area. According to the HIC, they have four child-only emergency shelter beds, one child-only transitional bed, eight adult-only beds, and twenty transitional housing family beds. YWCA Central MA/Battered Women's Resources offers emergency shelter to adults and children for DV victims. Guests are provided shelter, counseling, and referrals as needed. The YWCA operates the shelter in Worcester, MA. The HIC reports that the North Central MA site has seven beds and one family unit. They serve about fifty adults and children in their shelter each year based on the previous Consolidated Plan. More current data is not available due to privacy concerns.

**Addntl Text 2 - List and describe services and facilities that meet the needs of homeless persons**

- South Middlesex Opportunity Council (SMOC) offers PSH for adults in recovery. They have served over 100 clients in their lodging house units in the last year in Fitchburg. These include Holt St. (60 co-ed units with case management); Myrtle Ave (16 all-male units with case management); and Leighton St (16 units with case management). SMOC provides case management and support services to residents at 4 Leighton Street, but

NewVue owns it. SMOC has two sites in Leominster - School St (co-ed) and Main St (all-male). They operate scattered-site housing under their Welcome Home Program, leasing and subletting units. There are four units in Fitchburg. Lastly, SMOC recently opened an emergency, non-congregate shelter with DHCD at the Days Inn in Leominster. They operate 28 units for individuals and couples and have 80 people on their waiting list. They have assisted over 100 people at the shelter thus far. The previous Consolidated Plan reports between 15 and 20 men served at their Harmony House facility, and 80 individuals served Hastings Hall facility per year. Due to privacy concerns, more current data is not readily available.

- Jeffrey's House has four sober houses for men and women in recovery. There is no required length of stay, and data is not readily available due to privacy concerns.
- Veteran Homestead Medically Fragile Unit (MFU) offers transitional housing for veterans with autoimmune diseases and substance abuse issues. Previous reports confirm about 15 individuals are served there per year. In 2019, the Disabled American Veterans (DAV) Department of Massachusetts Service Fund Inc. merged with Veterans Homestead and assumed responsibility for the organization and its properties.
- Armistice Homestead, also acquired by the Disabled American Veterans (DAV) Department of Massachusetts Service Fund in 2019, offers services for about 15 medically fragile/terminally ill veterans suffering from substance abuse, mental illness, or other medical issues. With 24-hour care, the program allows veterans to maintain independence and dignity in a home-like atmosphere. Residents receive personalized case management, access to VA services, and a community of support.
- Community Healthlink, Inc. in Leominster has three centers: the Counseling Center, Lipton Center, and the Early Intervention Center. Prior reports confirm their Substance Abuse Shelter serves approximately 780 clients per year, and clients are usually discharged to a local shelter after treatment. Due to privacy concerns, more current data is not readily available. The HIC states that Community Healthlink operates 13 adult-only Safe Haven beds, 28 adult-only transitional housing beds, and 445 PSH beds in the CoC.

Other assistance programs for veterans and their families include the VA Supportive Housing and Treatment (VASH) program. There are 34 VASH family units and 248 VASH beds in the CoC. Other programs for special needs homeless populations include three Emergency Solutions Grant (ESG) Rapid Rehousing beds provided by Our Father's House, and seven Rapid Rehousing beds provided by LUK's Young Adult Rapid Rehousing program. If they meet certain criteria, homeless families with children may access services through DHCD's Emergency Assistance (EA) Family Shelter system. The EA program houses homeless families in hotels across the state if shelters cannot. The Consortium will continue to provide

CDBG -CV( CARES) funding to activities that offer short-to-medium term assistance for the homeless and chronically homeless throughout this Consolidated Plan.



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

There are several organizations offering assistance to the Consortium. Many offer services tailored to special needs populations. Community Healthlink offers adult mental health, prevention, peer support, transportation, and housing assistance. They have a contract with Fitchburg Police for crisis intervention; the police go out with a counselor 2x a week to people identified via calls. They then follow up to see if they sought out services. Provider services include shelter, job training, legal assistance, counseling, and case management. SMOC administers services and operates 2 supportive housing sites. They offer private prevention and housing stabilization. The Fitchburg Community Development Dept. and the Leominster Office of Planning and Development work with nonprofits and with the CoC. Service provision is designed to help the homeless break the cycle caused by overlapping mental health and substance abuse. Organizations have formed partnerships to utilize resources such as clinics and food pantries. Organizations in the Consortium who complement mainstream options include:

- MOC (Community Action Agency for both cities);
- The Fitchburg and Leominster Community Development Departments;
- The Fitchburg and Leominster Veteran Services Office;
- The Spanish American Center;
- Catholic Charities Worcester County;
- DMH – Central MA Office;
- CMHA;
- Community Healthlink; and
- Community Health Connections.

Other programs include those offered by DHCD (the Residential Assistance for Families in Transition (RAFT)). Homeless or at-risk LMI families receive assistance with rent, mortgage, or utility bills through the program. RAFT provides up to \$10,000/household to preserve their current housing or move to new housing. DHCD also offers the Emergency Rental and Mortgage Assistance Program (ERMA). ERMA provides assistance to LMI households who may not be eligible for RAFT. HomeBASE is another DHCD homeless prevention program for families eligible for Emergency Assistance (EA). HomeBASE offers re-housing alternatives to EA shelter and opportunities to overcome financial barriers. EA-eligible families who choose HomeBASE receive assistance to pay rent, utilities, security deposits, etc. to stay in place, relocate, or live with another family. RCAP Solutions, Inc. operates RAFT and HomeBASE in the Consortium and assists with housing and lending. CMHA provides ERMA and RAFT assistance.

The Fitchburg Veteran Services Office and the Leominster Veterans Services Dept. provide referrals to veterans in need. They make referrals to shelters and public housing. They refer individuals to Statewide Housing Advocacy Reintegration and Prevention - a collaboration between the Dept. of Veterans Services and the U.S. DVA. Leominster's Veterans Services provides emergency benefit case management and assistance with VA health care applications. The DMH, DTA, and the Gardner Visiting Nurses Association provide case management, outpatient services, and income support to the homeless.

Through McKinney-Vento, Fitchburg Public Schools assists homeless students with supplies, backpacks, field trips, school pictures, and other payments.

**List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.**

Facilities for homeless and at-risk, the chronically homeless, families, veterans, and unaccompanied youth are divided into 3 types: Emergency Shelter, Transitional Housing, and Permanent Supportive Housing (PSH). These facilities provide support to address needs and end the cycle of homelessness. Examples of services include housing, diversion and prevention, job/housing search, childcare, and street outreach. CMHA data supplements HIC data in this section. In 2020, CMHA reported 405 units and 594 beds of Transitional, Safe Haven, Permanent Housing (PSH and Rapid Rehousing). There was 347 CH-Dedicated, CH-Prioritized, or Dedicated PLUS Beds reported, and 285 units with services funding.

HUD defines Emergency Shelters as any facility providing a temporary shelter for the homeless/subpopulations that do not require leases or occupancy agreements. Emergency shelters are short-term solutions to an emergency that has resulted in homelessness. Emergency shelters are the most common type of homeless facility, and rooms are not always guaranteed. There are 256 family units, 843 family beds, 131 adult beds, and six child-only beds within the CoC's Emergency Shelter system. Our Father's House and North Star Family Services are the main providers. North Star Family Services is the primary shelter for families. Our Father's House has 28 adult-only beds and 2 overflow/vouchers. Chronically homeless individuals and families are often referred to emergency shelters by the police or other agencies if they do not admit themselves. Many emergency shelters have specialized training to service DV victims, including Elizabeth House and YWCA of Central MA. Shelters must prioritize families and unaccompanied youth.

HUD defines Transitional Housing as housing designed to provide individuals and families with interim stability to move to and maintain housing successfully. The period for those moving from homelessness to permanent housing is usually 2 years. Transitional Housing is the next step for those with substance abuse issues, with referrals from emergency shelters, detoxification programs, and other partners. Transitional Housing promotes tenant independence to transition back into the workforce and regular social environments. Armistice Homestead (for veterans), LUK, Inc. (for youth), and Jeffrey's House (for those in recovery) are providers that offer counseling, mental health services, case management, and skills training. There are 46 family units of Transitional Housing, 139 family beds, 257 adult-only beds, and 1 child-only bed in the CoC. LUK offers 10 family units and 20 family beds for their RHY Maternity Program. They have 8 adult beds and one bed for a child as part of their RHY Transitional Living Program. Elizabeth's House offers twelve adult-only transitional beds.

PSH is community-based housing without a designated length of stay, where formerly homeless independently. PSH participants must be tenants on a lease/sublease for at least 1 year. Leases are renewable and terminable only for cause. HUD funds 2 types of permanent housing: PSH and Rapid Rehousing. PSH helps residents maintain long-term tenancy with supportive services. Those who are chronically homeless and populations in need of long term support are common. There are 919 year-round beds, 571 Rapid Rehousing beds, and 33 “other” beds. CMHA reported 384 units and 537 beds in 2020. There were 341 CH-Dedicated, CH-Prioritized, or Dedicated PLUS Beds, and 264 units with supportive services funding.

[See additional text for more.]

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

### **Introduction**

The Consortium cities are the regional bases for many state agencies, including the Departments of Mental Health (DMH), Children and Families (DCF), and the Department of Transitional Assistance (DTA). The cities have responded to LMI needs by developing a network of community-based programs administered by the agencies in section MA-40. Most of these agencies are designed to meet regional needs; however, most special needs programs are in Fitchburg. Special needs populations require more specialized services and case management to remain in housing. Non-homeless special needs subpopulations include: the elderly; the frail elderly; those who are severely mentally ill; physically and developmentally disabled people; people suffering from substance abuse; veterans; DV victims; and people with HIV/AIDS. A combination of services and partnerships addresses these subpopulations' needs, with locations based on the capacity of existing services. Federal housing programs and public housing units supplement DHCD- funded public housing. State project and tenant-based vouchers supplement federal voucher programs, such as Section 8.

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

The number of people in need of specialized housing services is not known, as each subpopulation has specific needs. However, numbers are estimated based on available data. The supportive needs of select populations are below. Please see MA-25 for information on public housing residents. The Elderly and Frail Elderly There are 3,059 LMI, cost-burdened elderly households, and 1,790 LMI, severely cost-burdened elderly households in the Consortium. Those 65+ are 15 of the Consortium's total population. For reference, seniors are 15 % of the county population and 16 % of the state population. Forty-five % of Consortium seniors are over 75. The ACS states 22 % of households are seniors living alone. Elderly living alone is 28 % of nonfamily renter-occupied households and 36 % of nonfamily owner-occupied households. Twenty-two % of those in the Consortium with disabilities are 65 to 74, and 45 % are older than 75. The Executive Office of Elder Affairs, the Executive Office of Health and Human Services, and the Massachusetts Healthy Aging Collaborative are state agencies that work with communities to address elderly needs. Regional and community-based organizations also receive state and federal funding to provide comprehensive elder, frail elder, and disability services such as the local Councils on Aging (COAs). The Fitchburg COA oversees the Fitchburg Senior Center at the Old Fitchburg Armory. Both the Leominster COA and the Fitchburg COA connect the elderly with the Montachusett Regional Transit Authority (MART) Senior Van Service to take them to and from major destinations in the area. Both offer meal services, connections to SHINE counselors (Serving Health Information Needs of Elders), and referrals to programs such as tax assistance and home maintenance. Leominster's COA provides wheelchairs, walkers, canes, and other equipment at no cost to elderly residents to help

them live safely in their homes. Both COAs work with the Executive Office of Elder Affairs and other public and private providers. Fitchburg's COA and the Montachusett Home Care Corporation are the Area Agencies on Aging and the state-designated Aging Services Access Points in the Consortium and members of the Mass Home Care Network. Habitat for Humanity and Fitchburg CDBG funds continue to assist homeowners with critical repair needs. Most program participants are elderly homeowners requiring accessibility improvements and measures to help age in place. Fitchburg's Homeowner Rehabilitation Program funds qualified applicants seeking renovations or upgrades. Fitchburg serves tenant units through their Homeowner Rehabilitation Program, averaging three rental units in owner-occupied properties per year. The City strives to rehabilitate one large rental development, between two and four units through HOME, and one homebuyer development through nonprofit partners each year. Leominster's Housing Rehabilitation Program assists elderly households throughout the City. Both programs allow residents to remain in their homes for as long as possible and work with community agencies regarding referrals.

### **Additional Text**

Fitchburg's Homeowner Rehabilitation Program funds qualified applicants seeking renovations or upgrades. Fitchburg serves tenant units through their Homeowner Rehabilitation Program, averaging three rental units in owner-occupied properties per year. The City strives to rehabilitate one large rental development, between two and four units through HOME, and one homebuyer development through nonprofit partners each year. Leominster's Housing Rehabilitation Program assists elderly households throughout the City. Both programs allow residents to remain in their homes for as long as possible and work with community agencies regarding referrals.

Leominster has five assisted-living facilities: Benchmark Senior Living at Leominster Crossings, Manor on the Hill, Sunrise of Leominster, Village Rest Home, and Armistice Homestead. Fitchburg has one assisted living facility, The Gables. However, it does not serve LMI households. Wallace Towers is a nine-bedroom supportive housing facility monitored 24/7 but is not assisted living. Through Fallon Community Healthcare, Summit Eldercare is available at Wallace Towers and offers case management, on-site medical care, adult day services, and household assistance. For over forty years, the Fitchburg Rehabilitation and Nursing Center has served Fitchburg, Leominster, Lunenburg, and Westminster. While this facility does not have affordable/ income-eligible options, it offers respite care, short-term rehab, hospice/end-of-life care, and long-term care solutions. As the elderly become frail, the demand for at-home services will increase.

Affordability and access to housing continue to be challenges for the elderly, frail elderly, and people with disabilities in the Consortium. Both PHAs provide elderly-disabled units that comply with ADA or Section 504. FHA has 302 elderly units and LHA has 341 elderly/young disabled units. For many years, the Consortium has used HOME funds for accessible rehabilitation and new construction. New HOME construction must comply with Section 504 of the Rehabilitation Act of 1973 - new multifamily rental construction of five or more units requires at least 5 percent to be accessible to individuals with mobility impairments. An additional 2 percent of the units must be accessible to

individuals with sensory impairments. The Consortium continues to incentivize a higher percentage of accessible units and encourage adoption of visit-ability standards. M.G.L Chapter 40B subsidized housing units must also follow state-mandated accessibility requirements.

## **Additional Text 2**

### **Persons with Disabilities – Mental, Physical and Developmental**

There are 11,599 individuals with a disability in the Consortium - 47% male and 53 % female. Of those with disabilities, 0.4% are under 5, 8.1% are between 5 and 17, 7.7% are between 18 and 34, 16.3% are 35 to 64, 22.4% are 65 to 74, and 45.1% are older than 75. Thirteen % of the Hispanic population has a disability, compared to 14 % of the Consortium's population. There are 4,439 people with an independent living difficulty, 2,590 with a self-care difficulty, 5,432 with an ambulatory difficulty, 6,154 with a cognitive difficulty, 1,737 with a vision difficulty, and 2,495 with a hearing difficulty. For those under 18, 0.3% have two or more disabilities. Four % of those between 18 and 64 have two or more types of disability, and 3% of those 65 and older have two or more types of disability. According to the ACS, three % of those with a disability between 18 and 64 were below the poverty level.

The DMH and the DDS provide services and housing to the mentally and developmentally disabled and those with severe mental health issues. People with only a mental illness would be supported (if eligible) by the DMH, as DDS only supports individuals with Intellectual or Developmental Disabilities (ID/DD) (and now Acquired Brain Injury and Autism). There are 9 subsidized units by EOHHS and 61 units subsidized by DDS on Fitchburg's SHI. There are 28 units subsidized by the Executive Office of Health and Human Services (EOHHS) and 67 units subsidized by DDS on Leominster's SHI. According to the Director of Policy & Strategic Initiatives/Ombudsman of the MA Commission for the Blind (MCB), Fitchburg has 222 legally blind residents, and Leominster has 223 legally blind residents.

There are 25 DMH units on Fitchburg's SHI and fourteen on Leominster's SHI. According to the Director of Quality Management for Central MA Area and the North County DMH Site Director, the number living in Fitchburg and Leominster with severe mental illness and receiving services is 171 and 116, respectively. The following are estimates of mentally ill individual percentages based on Census data:

Adults (19-64) with severe mental illness (5.7%)

- Leominster: 2,372
- Fitchburg: 2,320

Elders (65+) with severe mental illness (1.57%)

- Leominster: 653

- Fitchburg: 63

### **Additional Text 3**

The ACS shows that 3 % of the Consortium's total population (2,170 people) live in group quarters, including specialized mental-health facilities. Of those in group quarters, 82 % live in Fitchburg. The group quarters population includes all people who are not resident household members. Institutional group quarters include correctional facilities, nursing homes, psychiatric hospitals, and similar institutions. Non-institutional group quarters include college dormitories, military barracks, group homes, missions, or shelters. What distinguishes group quarters apart is that occupants do not comprise a household. Instead, the occupants are unrelated and living in a congregate situation. Data differentiating those in institutional and non-institutional group quarters were unavailable at the City level. The percentage of group quarters in Fitchburg is attributed to the presence of Fitchburg State University. The figures above outline how the Consortium's group quarters population is divided by Census tract.

[See Appendix for Figures MA-35.1 and .2]

### **People with Substance Abuse Issues**

The DPH and the Bureau of Substance Abuse Services reported 849 admissions for primary substance use in Fitchburg in 2017. Fifty-nine % of admissions were unemployed, 34 % were homeless, and 74 % had a high school diploma/GED or less. Leominster saw 622 admissions in 2017, of which 21 % were homeless, 58 % were unemployed, and 74 % had a high school diploma/GED or less. Heroin was responsible for over half of admissions in both cities (56 % in Fitchburg and 53 % in Leominster). Alcohol is the second most commonly-abused substance (28 % in Fitchburg and 31 % in Leominster). Since 2008, there has been a 9.2 % decrease in admissions for alcohol treatment in Fitchburg and a 17.7 % decrease in Leominster. Heroin-related admissions have increased 14.9 % in Fitchburg and 22 % in Leominster during this same period. There is a lack of supportive housing as more people are discharged from detox and rehabilitation facilities. The following is what is available in the Consortium:

- Healing Hills Village Addiction and Recovery is a detox and rehabilitation center in Westminster
- Spectrum Health Systems in Leominster offers outpatient and inpatient treatment, residential treatment, and detoxification. The facility provides other programs and treatment, such as driver education, peer support, and adolescent services.
- Community Health Connections offers a range of programs and other mental health treatment, including addictions not related to substance use.

### **Additional Text 4**

- The Fitchburg Comprehensive Treatment Center is a CARF-accredited treatment center where opiate-addicted individuals receive counseling and a medication-assisted treatment (MAT)

program. The Substance Abuse and Mental Health Services Administration approved this program.

- LUK, Inc. offers street outreach to those with drug/alcohol abuse, mental health issues, or a dual diagnosis. They provide outpatient treatment for addiction, and have drug abuse prevention and counseling. Those struggling find this drug rehab helpful because it provides foster care and young parent support.
- Right Choice Health Care is a drug and alcohol rehab center that treats alcohol and opioid use disorders on an outpatient basis. They use evidence-based therapies and medication-assisted treatment to control cravings and withdrawals. Detox services are also available. Right Choice Health Group has eight locations, including one in Fitchburg.

### People with HIV/AIDS

The DPH's Bureau of Infectious Disease and Laboratory Sciences said Fitchburg had 166 HIV/AIDS patients and Leominster had 100 in 2019 – below state averages. There are 23,291 with HIV/AIDS in MA today. There are limited facilities and services for those with HIV/AIDS across the Consortium. Community Health Connections has an outpatient treatment center for HIV and Hepatitis C patients to receive medications. MOC offers Care AIDS Services, a case management program to increase engagement in medical care. Case management includes referrals, SNAP and Mass Health assistance, and the HIV Drug Assistance Program. The program includes supportive services and homelessness prevention, such as housing searches, rental start up assistance, rent and utility arrearage assistance, referrals for furnishings, etc. Those with HIV/AIDS making less than 80% AMI are eligible for HOME and CDBG funding.

- LMI special needs populations focus on federal programs due to their high and growing needs compared to the rest of the population. The (frail) elderly, people with disabilities, people with substance abuse issues, people with HIV/AIDS, and public housing residents share a need for more affordable housing and specialized services. CPP feedback confirmed that the greatest requirements are:
  - More affordable housing, including transitional housing;
  - Services located near one another or within access to public transportation;
  - Accessible public units and funding for public housing;
  - Mental health counseling and access to high-quality behavioral health services for all ages;
  - Access to services in situations of crisis;
  - Substance abuse treatment services; and
  - Land/tenant dispute resolution.

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

Group quarter's data specifies how populations are divided across the Consortium. Elderly and disabled populations, like many in group quarters, are unlikely to change their living situation. Institutional and



many types of non-institutional quarters are usually permanent residences. Massachusetts requires that facilities avoid discharging those returning from psychiatric institutions to a homeless shelter or the street. The Department of Mental Health discharge procedures, 104 C.M.R. 27.09(1)(b) states: “A facility shall make every effort to avoid discharge to a shelter or the street. The facility shall take steps to identify and offer alternative options to a patient, document such measures, including the competent refusal of alternative options to a patient in a medical record. In case of such discharge, the facility shall nonetheless arrange for, or in the case of a competent refusal, to identify post-discharge support and clinical services. The facility shall keep a record of all discharges to shelter or the street...” If a patient refuses alternatives outside of a homeless shelter or no shelter, the quarters must identify post-discharge support and clinical services and notify the DMH. There is a lack of support for those returning from institutions in the Consortium, reinforced by the CPP process. The main Consortium providers are below.

- The Gardner Visiting Nurse Association serves Fitchburg and Leominster. It provides Home Assisted Living designed to restore and maintain well-being and support people staying in their homes. The GVNA offers services that support those returning from health institutions, including nursing, rehabilitation therapies, medical social workers, home health aides, and maternal-child healthcare.
- The Seven Hills Foundation supports adults with disabilities in community residential homes and shared living arrangements. Child and Family Services, an affiliate of Seven Hills, is in Fitchburg.
- Open Sky Community Services has administrative offices in Leominster and operates various residential programs in the Consortium. The mental health programs include group residences and apartment programs. There also have developmental disability programs that include group residences.
- The Aging Services of North Central MA offers local supportive housing sites at the following locations in conjunction with the Executive Office of Elder Affairs: C.J. Durkin Apartments in Fitchburg and LaPierre East in Leominster.
- Community Health Link has a Community Support Program (CSP) that provides short-term outreach and care management to individuals at risk of repeated psychiatric hospitalizations and or inpatient substance abuse treatment. The services focus on assisting individuals with challenges in accessing or sustaining health and social services. The CSP team has outreach workers who speak English, Spanish, Vietnamese, Khmer, Twi, and Albanian.

**Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)**

Strategies to address the housing and service needs of people who are not homeless but have other special needs include:

- Promote continuous supportive services for non-homeless special needs populations that allow them to remain in their housing, particularly the elderly and those with disabilities;
- Improve access to information about services through state and local partnerships and address capacity issues, particularly for those with mental health and substance abuse issues and those in transitional phases;
- Provide a range of diverse housing for persons with specialized housing needs, equipped with health services/access to timely health care; and
- Grow and improve the affordable rental housing supply through rehabilitation, new development, preservation, and other creative solutions, especially housing with programs that further opportunities for LMI residents, minorities, the elderly, and the disabled.

The Consortium works closely with organizations that provide services through the CoC, Serving the Health Insurance Needs of Everyone (SHINE), Community Health Connections, MOC, and related groups. Investment in and collaboration with special needs populations will be allocated throughout the Consortium over the next five years. Both PHAs provide subsidized elderly and disabled housing to eligible community members. As mentioned, CDBG and HOME-funded housing rehabilitation is also offered per income eligibility guidelines and in target areas. The needs of the elderly and disabled residents are recognized as special needs consistent with existing housing plans, and resources will be allocated accordingly. The waiting list for subsidized housing reflects the need for more units to be brought online. Another gap is the lack of living facilities in Fitchburg with affordability components. The Consortium is funding the following projects to address needs over the next five years:

- Improvements to the Street Homeless Intervention Program;
- Drug Enforcement and Patrol Program;
- Creation of permanent housing for family shelter clients;
- Provide CDBG funding for various housing projects by North Star Family Services;
- The Fitchburg Homelessness Prevention Project;
- Board of Health Code Enforcement;
- Critical Home Repair;
- Demolition, Rehabilitation, and Acquisition; and
- Aging Services of North Central MA's Financial Program.

**For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))**

The Consortium provides HOME funding for special needs non-homeless populations when funding is requested for activities and projects. HOME funding is primarily used toward hard costs associated with rehabilitation, homebuyer activities, and rental activities. CDBG funds are a more flexible avenue of funding. The Consortium assists agencies with CDBG for housing that benefits special needs populations upon request. For example, Fitchburg anticipates assisting 35 households through its Homeowner

Rehabilitation Program over the next five years (primarily elderly households). The program funds qualified applicants seeking renovations/upgrades, especially elderly residents aging in place.

Fitchburg will support programs for people who are not homeless but have other special needs, including using CDBG funds toward the North Star Family Services, Inc. Shelter Program. The program assists with budgeting, employment search, housing search, case management, and shelter services. Follow-up services are provided to residents who left the program to help former residents maintain permanent housing. Leominster provides CDBG public services funding to the following programs that benefit the formerly homeless, the elderly, and people with developmental disabilities: the North Star Family Services, Inc., which provides mentorship for its program graduates to help them stay housed and provides assistance to homeless families; the Aging Services of North Central MA's Financial Program, which assists elderly and disabled individuals remain independent in their homes in safety and dignity while avoiding financial exploitation; and Beacon of Hope Community Services, which provides funding for a day and evening respite program for mentally challenged adults. Other Consortium providers that the City will collaborate with over the next five years include NewVue Communities, Inc., LUK, Inc., MOC's Family Resource Center, the Arc of Opportunity, the Councils on Aging, and the PHAs.

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

### **Describe any negative effects of public policies on affordable housing and residential investment**

Regulatory and administrative barriers to affordable housing exist at the federal, state, and local levels. Low wages, inaccessible employment opportunities, lack of public transportation, financial and legal policies around foreclosures, and bureaucratic “red-tape” exacerbate these barriers. There are fewer bureaucratic steps concerning affordable housing investment and development in Leominster. However, both cities continue to have a backlog of applicants for public housing. DHCD and HUD are aware of the shortcomings of the waitlist system. Both cities commissioned planning efforts to establish priorities and strategies and implement policies that remove or lessen obstacles and encourage investment in LMI neighborhoods. The Consortium recognizes that the shortage of affordable housing goes beyond supply-and-demand, as other factors relating to community development also play a role. Recent planning in Fitchburg includes the 2018 Economic Development Plan and their comprehensive zoning ordinance update. The Consortium promotes policies that positively impact the cost and availability of public housing and incentivizes the development and maintenance of the available supply. Current tax policies, building codes, fees/charges, and other Consortiums-based policies do not discourage affordable housing development. Recognizing this, the Consortium understands that federal, state, and regional policies have a role that trickles down to the local level and can create development challenges. A summary of those policies is [here](#).

#### **FEDERAL GOVERNMENT POLICIES**

Housing policies implemented in the mid-twentieth century continue to hinder public housing development. A history of federal funding cuts, discrimination, and other issues throughout the twentieth and twenty-first centuries drastically disenfranchise investment and development in affordable housing, leaving state and local governments with limited resources. Reduction in rental and project-based assistance through the 1980s remains steadfast, prioritizing programs that assist wealthier homeowners (middle-class and higher) over lower-income renters, seniors, disabled persons, and other non-homeless special needs populations. Increases in construction and development costs and onerous federal regulations/regulatory review processes deter developers from producing affordable housing.

#### **Additional Text**

#### **STATE GOVERNMENT POLICIES**

The regional planning agency (Montachusett Regional Planning Commission) and various planning agencies and efforts reference the following state policies as strategies to forward affordable housing. Massachusetts Chapter 40R M.G.L Chapter 40R is a state law that establishes “Smart Growth” overlay districts that encourage communities to create dense residential or mixed-use zoning near transit stations, in areas of concentrated development, and other suitable locations. Chapter 40R incorporates a higher percentage of affordable housing in an area, with funding from the state to support these efforts. DHCD published a design standard guidebook for the program. Fitchburg currently has two approved 40R districts, and Leominster has none.

#### Massachusetts Chapter 40B

M.G.L Chapter 40B is a state statute enabling local Zoning Boards of Appeals (ZBAs) to approve affordable housing developments under flexible rules if at least 20 to 25 percent of the units have long-term affordability restrictions. The law gives developers the ability to override local zoning if the ten percent affordable threshold is unmet. A voluntary process under 40B is also available, known as the Local Initiative Program (LIP). The LIP program allows a government to use locally supported 40B developments and Local Action affordable units to meet the 10 percent threshold. Chapter 40B developments can be single-family homes, townhouses, duplexes, and condominiums. They can be sold as new units or resale units by current homeowners. This policy continues to receive pushback from many communities but is employed in both Consortium cities.

#### LOCAL GOVERNMENT POLICIES

Zoning and land use affect affordable housing costs and production. Several zoning policies exist to further affordable housing in the Consortium.

#### **Additional Text 2**

##### Inclusionary Zoning

Inclusionary zoning requires a percentage of units are allocated as affordable housing in new development. These allocations can be on-site or off-site. Many communities have adopted inclusionary bylaws that promoted mixed-income living. Organizations advocate for this style of development to create affordable housing for those at or below 80 percent AMI. Some inclusionary zoning regulations include units up to 120 percent AMI. Fitchburg and Leominster support and advocate for inclusionary zoning in City developments, particularly new developments in the Downtown.

##### Accessory Dwelling Units (ADUs) and In-Law Apartments

ADUs are a low-impact, effective way to augment the housing stock and avoid displacement, particularly of elderly and disabled people in need of additional care and the low-income workforce. The American Planning Association (APA) defines ADU's as "smaller, independent residential dwelling unit located on the same lot as a stand-alone (i.e., detached) single-family home." Their applicability is far-reaching, allowing properties and outbuildings to become year-round affordable housing. Fitchburg allows ADUs by right in their RR and RA districts and by Boards of Appeals Special Permit in the RB district. Leominster allows Accessory Apartments by Special Permit in the RR, RA, RB, and RC districts.

### Zoning Overlay Districts

Zoning Overlay Districts establish or modify development regulations such as dimensional and use requirements in underlying districts. Overlay districts can be for various purposes, such as expanding densities in Central Business Districts (CBDs) or protecting historic properties and environmental areas. Overlay districts commonly include provisions for creating affordable housing, such as density bonuses, greater height requirements, and mixed-use development. Examples of overlay districts in Leominster are the Downtown Overlay District, the Mechanic Street Overlay District, and the Urban Corridor Overlay District. Fitchburg has a Planned Development District, a Priority Development Site Overlay District, and a Smart Growth Overlay District that promotes housing via mixed-use and conversion.

### Other

The Consolidated planning process outlined the following barriers to affordable housing development to monitor, research, and improve, while optimizing programming and funding:

- Community Opposition and NIMBYism;
- Public Infrastructure;
- Limited Transportation; and
- Resource Allocation.

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

### **Introduction**

During the height of the manufacturing era, Fitchburg was an economic engine. Once manufacturing declining in '60s and 70s, so did Fitchburg's economy and population. There has been a 7% population decrease in 40 years. There has been a 10% decline in jobs. Drops in house values following the recession left many properties worth less than their mortgage, leading to foreclosures. Unemployment spiked, and the City is still recovering. According to the Economic Development Strategic Plan, more than one-quarter of Fitchburg properties were still underwater in 2015 – the second-highest in the state. Today, the City is more diverse. Fitchburg has a higher share of residents living in poverty, higher unemployment, and lower educational attainment. These challenges, compounded by an isolated location, hinder growth. Better transportation could link the City and contribute to a vibrant economy. Routes 2 and Interstate 190 are the 2 roads serving Fitchburg. The Commuter Rail to Boston stops near Downtown and Fitchburg State University. There is no MBTA bus service, but the MRTA offers a local fixed-route, regional bus routes, and out-of-town shuttles.

The Econ Dev Strategic Plan found Fitchburg contains a significant number of jobs in the Health Care and Social Services and Education sectors - expected to grow rapidly in the region. Fitchburg also has many retail jobs, as residents from other communities come to Fitchburg to shop. It is underserved in the Food Service & Drinking retail sector. The manufacturing sector is 12% of local employment, particularly in paper and metal fabrication. The City's government, university, businesses, etc. train/employ residents for job opportunities, including in green energy, manufacturing, and entrepreneurship. Those added skills are required to create jobs, as remaining dynamic is critical to success. The MassHire North Central Career Center, NewVue, the North Central MA Chamber of Commerce, the Fitchburg Redevelopment Authority, and My Turn provide resources to job-seekers and employers. They work with other organizations to provide workforce development for various abilities and stages in their careers.

The Montachusett RPC and the Fitchburg conduct studies and maintain updated statistics on economic conditions, trends, demographics, and redevelopment/growth opportunities. Targeted planning used information from these studies: particularly the Montachusett Regional Strategic Framework Plan, the 2019-2024 CEDS, the 2018 Economic Development Strategic Plan, and the Downtown Fitchburg Urban Revitalization and Development Plan.

## Economic Development Market Analysis

### Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	42	0	0	0	0
Arts, Entertainment, Accommodations	1,833	0	13	0	-13
Construction	683	0	5	0	-5
Education and Health Care Services	3,467	0	24	0	-24
Finance, Insurance, and Real Estate	602	0	4	0	-4
Information	314	0	2	0	-2
Manufacturing	2,511	0	18	0	-18
Other Services	477	0	3	0	-3
Professional, Scientific, Management Services	1,077	0	8	0	-8
Public Administration	0	0	0	0	0
Retail Trade	2,138	0	15	0	-15
Transportation and Warehousing	445	0	3	0	-3
Wholesale Trade	594	0	4	0	-4
Total	14,183	0	--	--	--

**Table 40 - Business Activity**

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



## Labor Force

Total Population in the Civilian Labor Force	21,020
Civilian Employed Population 16 years and over	18,370
Unemployment Rate	12.60
Unemployment Rate for Ages 16-24	24.48
Unemployment Rate for Ages 25-65	9.07

**Table 41 - Labor Force**

Data Source: 2011-2015 ACS

Occupations by Sector	Number of People
Management, business and financial	3,520
Farming, fisheries and forestry occupations	915
Service	2,250
Sales and office	4,510
Construction, extraction, maintenance and repair	1,490
Production, transportation and material moving	1,285

**Table 42 – Occupations by Sector**

Data Source: 2011-2015 ACS

## Travel Time

Travel Time	Number	Percentage
< 30 Minutes	11,390	65%
30-59 Minutes	4,490	26%
60 or More Minutes	1,590	9%
<b>Total</b>	<b>17,470</b>	<b>100%</b>

**Table 43 - Travel Time**

Data Source: 2011-2015 ACS

## Education:

### Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	1,515	360	985
High school graduate (includes equivalency)	4,265	735	1,635
Some college or Associate's degree	4,455	475	1,180
Bachelor's degree or higher	4,010	275	405

**Table 44 - Educational Attainment by Employment Status**

Data Source: 2011-2015 ACS

## Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	120	170	305	610	845
9th to 12th grade, no diploma	475	360	645	770	900
High school graduate, GED, or alternative	1,735	1,850	1,480	3,310	1,945
Some college, no degree	2,520	1,410	825	1,860	800
Associate's degree	205	510	555	1,000	335
Bachelor's degree	400	1,290	760	1,255	350
Graduate or professional degree	10	275	240	865	300

**Table 45 - Educational Attainment by Age**

Data Source: 2011-2015 ACS

## Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	25,843
High school graduate (includes equivalency)	30,987
Some college or Associate's degree	32,420
Bachelor's degree	50,310
Graduate or professional degree	61,667

**Table 46 – Median Earnings in the Past 12 Months**

Data Source: 2011-2015 ACS

**Additional Text for Describe any current workforce training initiatives:**

Other workforce initiatives offered by CDBG subrecipients, the City, and regional partners are:

- WORK, Inc. provides employment services for the Massachusetts Rehabilitation Commission (MRC) Statewide Employment Services (SES), the Department of Developmental Services (DDS-North Central Area Office), and the Department of Transitional Assistance (DTA Fitchburg Transitional Assistance Office). It also provides job readiness skills, vocational exploration, soft skills, transportation and job development, and search opportunities.
- My Turn, Inc. works with low-income youth between 16 and 24 who have graduated, obtained their High School Equivalency Test, or are close to obtaining their HiSET. These

students have additional barriers, including pregnancy/parenting status, homelessness, court involvement, and disability status. The program works with 25 to 30 "active" (first year) students and fifteen "follow up" (second year) students from the North Central Massachusetts Workforce Investment Area each year. Funding comes from Workforce Innovation and Opportunity Act (WIOA) funds under the U.S. Department of Labor. The program provides paid internships and occupational skills credentials to prepare students for earning livable wages and securing positions in high-growth fields. The goal is to meet students' needs and the needs of the local economy by creating a pipeline of skilled employees for the area's fastest-growing and\ emerging fields.

- The North Central Career Center in Leominster provides a pool of skilled labor by training and retraining the workforce. The local Workforce Investment Board administers the Center. Partners include the Division of Career Centers, Division of Unemployment Assistance, Employment Links, Inc., and the Mount Wachusett Community College Education Opportunities Center.

**Additional Text 2 for Describe any current workforce training initiatives:**

- The Training Resources of America Incorporated (TRA) is a private, non-profit organization providing quality education, employment and training services in Fitchburg. TRA has made it possible for educationally and economically disadvantaged youth and adults to improve the quality of their lives. Services offered include: increasing basic reading, language, and math levels; improving English speaking/comprehension capabilities; obtaining a High School Equivalency Credential; learning new skills; developing self-confidence; finding and retaining employment; improving opportunities for increased earnings and job advancement; and becoming active and productive members of their communities. Workforce Investment Boards and other funding organizations have benefitted from TRA's ability to provide high quality development services.
- The North Central MA Chamber of Commerce offers collaborations with local schools and colleges, internship and career exploration programs, and the HYPE Young Professionals Network. They engage and connect businesses to the next generation to ensure a consistent and continual talent pipeline. The Chamber also offers the AMP it up! Initiative, helping students and adults take advantage of the highly-skilled, well-paying manufacturing jobs in processing, factory automation, product development, nanotechnology, direct digital fabrication, and micro manufacturing. North Central Massachusetts Workforce Investment Board, Inc. is a private non-profit corporation serving as the regional Workforce Investment Board under the Federal Workforce Innovation Opportunity Act. The Board is responsible for the policy and oversight of all state and federal workforce development initiatives. The Board oversees two Career Centers in Leominster (the North Central Career Center) and Gardner. These Centers improve the economic well-being of businesses and workers by reinforcing the competitive strength of the workforce and improving employability through education, training, and employment programs/services.

- Mount Wachusett Community College in Gardner is the local community college offering continuing education classes, workforce development programs, adult education classes, and support services. Workforce development programs include online professional development courses and certificate programs such as corporate training, EMS/EMT training, Google IT Support professional certificates, advanced manufacturing, online cannabis career training, and electronics and technology technician courses.
- The Shriver Job Corps Center at Devens is the nation's largest residential education and vocational training program for economically disadvantaged youth. The program is for eligible youth at least 16 years of age that qualify as low-income.

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

Table 45 indicates that the Education, Health Care, and Social Assistance industry has the largest share of workers (24 percent) and jobs (44 percent). Manufacturing has the second-largest share of workers at 18 percent. Retail trade has the second-largest share of jobs at 12 percent. The North Central Massachusetts Workforce Investment Board's (NCMWIB) 2020-2022 Strategic Plan identifies the region's priority sectors like Healthcare and Social Assistance, Advanced Manufacturing, and Transportation, Warehousing and Logistics. Their Central MA Regional Workforce Blueprint (2018- 2022) reiterates that these industries are the top regional workforce priorities. The following were identified as critical for the region: Professional and Technical Services, Construction, Retail/Hospitality, and Education. The Montachusett Regional Planning Commission's CEDS report found the fastest-growing occupations are air conditioning, and refrigeration mechanics and installers.

**Describe the workforce and infrastructure needs of the business community:**

Pressing needs to grow the economy include affordable housing and public transportation access. Participants ranked infrastructure such as streets, sidewalks, and storefronts as high needs during the CPP. Storefront upgrades are difficult as most buildings are privately-owned. Leaseholders often cannot upgrade their space while paying rent and utilities. The City continues to pursue beautification, lighting, and safety improvements Downtown.

Limited housing and transportation prevent people from moving to/remaining in the area. Employers desire improvements to grow the workforce. ACS and wage data confirm Fitchburg businesses are not paying wages to afford the cost of living. CEDS data rates housing, transportation infrastructure, and transportation availability as the top weaknesses. Greater transit availability and multimodal options are critical to attracting workers and employers. Providing alternatives for those without a car increases employment (particularly for the LMI) and the appeal of working/living in Fitchburg.

Commercial districts not serviced by infrastructure deter businesses, resulting in a potential loss of jobs. The City has a water/sewer system. However, streets and sidewalks need repair, with street improvements identified in both communities in the Needs Survey. The City's topography poses

maintenance challenges, and sidewalks need accessibility upgrades. The cost of street improvements makes this difficult. There is also concern over hazard mitigation and the impact of severe weather. The City will continue to promote resilient infrastructure.

Changes in manufacturing pose challenges, as 18% of the City's employment base work in that industry. There is a 12% discrepancy between workers and the number of available jobs. The industry is requiring more skilled labor. The region's workforce must operate high-tech equipment that seasoned workers may not know how to. Fitchburg is underserved in the Food Service and Drinking retail sector, with \$50 million in unmet demand according to the 2018 Econ Dev Plan. There is a 12% discrepancy between jobs and workers in Arts, Entertainment, and Accommodations, and a 3% discrepancy in Retail Trade - both could be revenue-generators. The popularity of the cannabis industry is an opportunity for industrial infrastructure that includes cultivating, processing, testing, and sales.

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

Upgrades in the following areas would have a positive economic impact on the Consortium, assist workforce development, and support business and infrastructure:

- Wastewater, water, and sewer;
- Housing stock;
- Public transportation and access;
- Public realm infrastructure, including streets; and
- Hazard mitigation and climate resiliency/mitigation.

The City utilizes public-private partnerships (PPP's) for economic development initiatives. One example is the City's partnership with Fitchburg State University to revitalize the Theater Block Downtown. Both cities have Opportunity Zones (OZ's) to encourage these partnerships to complete housing, economic, and capital improvement projects. PPP's are often used to improve transportation, utilities, and affordable housing, as seen in the Montachusett Regional Planning Commission's CEDS. PPPs are effective when other funding streams are restricted, such as CDBG funds. Other changes that will have an economic impact include the strengthening relationship with Fitchburg State University, Downtown revitalization efforts such as "ReImagine North of Main," collaboration on technical assistance and workforce development with NewVue, and reliance on ESL speakers - a growing population throughout the region. The Fitchburg Redevelopment Authority outlines the following in their recent Urban Renewal Plan that will have long-term effects on private sector investments and may affect job and business growth opportunities:

- Acquire a total of 68 individual parcels totaling 54 acres;
- Demolish 37 properties for redevelopment;

- Designate 15.6 acres for rehabilitation of existing structures;
- Acquire 6.7 acres for public improvements (parks and roadways);
- Invest in infrastructure improvements to help attract development;
- Change zoning to mixed-use commercial, residential and light industrial; and
- Create an institutional zone along the North Street corridor to guide future institutional expansion – particularly Fitchburg State University – and protect and stabilize the residential character of the adjacent neighborhoods.

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

There are 5,745 people in Fitchburg that have a Bachelor's degree or higher, including 1,290 aged 25 to 34. The data underscores the influence of Fitchburg State University on the population. Those with a Bachelor's degree earn up to \$20,000 more than those who are solely high school graduates. Higher paying jobs now require a Bachelor's degree at the very minimum. Many employers can provide on-the-job training, but as the workforce becomes more competitive, minimum hiring requirements have risen, and most jobs require higher education after high school. Regional education attainment is lower than the state, but the CEDS found that rates are increasing among young professionals. Young women, in particular, are graduating from high school and college at higher rates than their male counterparts. The North Central MA Workforce Investment Board states that training and education must be coordinated and provide career pathways aligning with regional realities. Schools, including Fitchburg State University and Mount Wachusett Community College, must update their curricula to keep track of economic trends. Job training and skills providers, such as NewVue, need to offer youth and adults the skills to be competitive workforce members.

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

The following initiatives support the Consolidated Plan by improving and growing the workforce, capacity, and skill levels. By growing and diversifying the region's demographic and economic profile, housing, household types, and incomes will also diversify. Development and training at multiple skill levels attract new employers, raise wages, and provide more employment opportunities for LMI populations. The Workforce Investment Board has identified the following initiatives in their updated Strategic Plan:

- Promote, develop and expand relevant career pathways, stackable credentials, work-based learning, and skill development opportunities to address the hiring needs of the region's priority industry sectors of Healthcare and Social Assistance, Advanced Manufacturing, and Transportation and Logistics.

- Increase access and opportunities for people with barriers to employment, such as people with disabilities, older workers, veterans, low-income adults, experienced or displaced workers with outdated skills, and college graduates with academic credentials not matched to skill demand.
- Provide the region's youth with opportunities, skills, and credentials to participate in career pathways and secure employment.
- Offer board members the opportunity to participate in program design and training to enhance their knowledge of the local and regional economy, workforce development initiatives and human resources, including diversity and the inclusion of the un/underemployed, workers with disabilities, minorities, older workers and re-entering workers.

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

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

The CEDS offers initiatives in coordination with this Consolidated Plan. They are below:

- Advancing high-quality infrastructure and community improvements
- Inventorying business assets to show regional strengths and identify emerging opportunities
- Researching what other communities are doing to support those in recovery and what services would help them re-enter the workforce
- Continuing to use recreation and cultural amenities to market the area for visitors and residents and maintaining resource inventories
- Continuing to monitor the Opportunity Zone program and identify ways to leverage it
- Working with the Chambers and business organizations to formalize a retention, expansion, and visitation program a
- Using entrepreneurial assets to create mentoring opportunities for younger entrepreneurs;
- Facilitating collaboration between health care, universities, and industries to identify regional assets
- Supporting awareness and exploration for youth and expanding work-based learning and education pathways
- Offering technical assistance to communities on uses of industrial properties;
- Identifying challenging Downtown properties/parcels and engaging partners to find financially feasible options;
- Supporting efforts to incentivize (re)development of housing affordable to a range of incomes;

- Focus resources and investments on helping residents and supporting creative tax policies to incentivize investment
- Identifying target properties for housing/mixed-use and preparing a financial feasibility analysis to spur development; and
- Working with health care providers and institutions to meet growing needs

The City's Economic Development Division implements recommendations in the 2018 Econ Dev Strategic Plan, the Downtown Urban Revitalization and Development Plan, and the Urban Renewal Plan. Those include strengthening the Downtown, revitalizing the streetscape, supporting job creation, addressing vacant properties, providing technical assistance, and facilitating redevelopment of brownfields. Staff work with non and for-profit agencies such as NewVue and Centro on activities to further economic growth for those most in need.

## **Discussion**

Recent economic trends in Fitchburg have been challenging in terms of labor force specialization beyond low-paying industries. It has also been challenging for employers to pay competitive wages, and as a result, the workforce's skillsets remain low, and they cannot meet current employer requirements. The number of jobs remains steady, but incomes are too low to afford available housing. The Consortium will utilize multiple partnerships and programs to maximize resources, attract higher-paying employers, and fund workforce training. Creating and attracting jobs is the most efficient way for LMI people to move to or live in the area; this is also critical for retaining talent from the University, supporting the regional economy, and adding to the commercial tax base. Incentivizing economic development through workforce training, infrastructure expansion, and streamlined permitting necessary. Furthermore, affordable housing is an economic issue, and the two are interdependent. More affordable housing, coupled with wage increases, promotes regional vitality.



## **MA-50 Needs and Market Analysis Discussion**

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

The highest concentrations of housing problems in Fitchburg are in and around Downtown, the City's oldest and most urbanized part. Defining characteristics include higher percentages of rental housing, older structures, concentrations of LMI households, and concentrations of minorities. These areas also have positive characteristics, such as more affordable living choices and proximity to services. Leominster has concentrations of households with multiple housing problems dispersed throughout the southeast portion of the City. This information is used to make recommendations, encourage developments in these areas, and target CBDG and HOME dollars.

It is the community development/housing organizations, developers, and other applicants' responsibility to submit proposals for HOME funding. However, the Consortium will advocate creating affordable housing and working with organizations/developers who submit proposals. Because the Consortium must be approached, it can be challenging to know where concentrations of housing problems may be forming.

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

As discussed in the Needs Assessment, minority residents are approximately 19 percent of the Consortium's population. Those of Hispanic/Latino origin comprise 24 percent of the Consortium's population, 12 percentage points higher than county and state figures. (Section NA-30 Disproportionately Greater Need includes a map of minority concentrations by Census tract.) The map confirms minority concentrations in the CDBG target area exceed the 31.8 percent threshold in multiple census tracts. These groups face disproportionately greater need than the rest of the population. The figure below breaks down minority populations by race and Hispanic or Latino origin by Census tract in Fitchburg.

This Consolidated Plan defines concentration as: "a Census tract or other defined geographic area in which the percentage of residents who are racial or ethnic minorities is at least 20 percentage points higher than the percentage of minority residents in the MSA (or jurisdiction not in an MSA) as a whole," according to OMB No. 2577-0269. Concentrations of minorities and LMI families overlap with areas with multiple housing problems, where the majority of the rental stock is, and where the lowest incomes are – the older and more urban parts of the community. These concentrations correspond to the target areas, which encompass Downtown and the surrounding census tracts. Concentrations of racial and ethnic minorities, poverty, and low-income households inform the decision-making process when determining resource allocation. Recommendations are based on this information, and developments are encouraged in these areas. HUD regulations (Site and Neighborhood Standards) affect the planning and approval of new or rehabilitated housing utilizing federal resources.

Fitchburg targets resources to address community needs and reports high numbers of minority households served by their housing programs. The City determines the most effective method to address the needs of racial or ethnic concentrations and LMI families' needs is through targeted assistance, including code enforcement and rehabilitation

[See Appendix for Figures MA-50.1 and .2]

### **What are the characteristics of the market in these areas/neighborhoods?**

Several characteristics impact the housing market and development, including zoning and land use regulations, land availability, development costs, land value, school systems, quality of services, access to transportation, current housing stock, and availability of employment opportunities. However, the characteristics of the concentrated areas are lower rents/housing prices, an older housing stock, lower median incomes, a higher percentage of minorities, more housing problems, and higher density compared to the rest of the Consortium.

### **Are there any community assets in these areas/neighborhoods?**

Community assets in these areas include schools; a university; a library; City Hall; places of worship; open space; parks and recreation facilities; neighborhood organizations; housing and social service providers; stores and restaurants; community gathering spaces, the YMCA, and the major transportation hub. The Consortium encourages developers to create affordable housing near these assets, and other commercial and transit centers.

### **Are there other strategic opportunities in any of these areas?**

These areas allow residents to be close to Downtown amenities and within walking distance of activities and services. They provide residents with opportunities to improve their health through active and passive recreation and walkable streetscapes. Strategic opportunities to expand affordable housing in the Consortium prioritize infrastructure availability, accessibility, proximity to services, and public transportation. The creation of affordable housing in these areas will give more residents access to needed housing, reduce regional housing costs, grow the labor force, and generate tax revenue to improve the quality of life.

## **MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)**

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

Broadband connectivity is critical to a community's success. Many tasks related to employment, education, and everyday life rely on internet access. Since the COVID-19 outbreak, telecommuting and remote access to work, school, and healthcare have become common. These important functions require strong, reliable internet connections throughout the community. According to the FCC, internet service is broadband if download speeds meet or exceed 25 Mbps and upload speeds meet or exceed 3 Mbps. In Fitchburg, the average household is served by three broadband providers. Analysis of broadband availability indicates that Fitchburg's internet connectivity ranks 110th, with 99.6 percent of the community served by three or more providers. Cable, fiber, and DSL connections are widely available (Comcast Xfinity and Verizon), as is satellite internet service (Viasat, formerly Exede, and HughesNet).

While internet access is vital to many, LMI households are most affected by lack of information or access to information. Comcast and Verizon offer discounted service plans to low-income households in Fitchburg. Both providers committed additional support for low-income subscribers throughout COVID by pledging to the FCC's "Keep Americans Connected Initiative" through June 2020. Following the end of the Pledge program, households eligible for public assistance and federal benefits can apply for Internet Essentials from Comcast or Lifeline from Verizon.

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

Limited competition for broadband services can drive up prices, so residents value having options among providers. Comcast, Verizon, Viasat, HughesNet, and Ultra Home Internet are all available to more than 95 percent of Fitchburg residents. These are nationwide providers, and there are no local provider options available.

## **MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)**

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

The Hazard Mitigation Plan is an in-depth analysis of natural hazards affecting Fitchburg. Flooding is the greatest hazard. The Plan's risk assessment states there are 265 critical facilities identified by the Hazard Mitigation Planning Team, 100 of which are in a 100-year or 500-year flood zone. Some facilities are in locations with vulnerable populations, hazardous material sites, gas stations, and underground storage tanks. These facilities must be protected from flooding as they threaten public health by causing downstream water quality and contamination issues if hazardous sites leach or erode. The value of all buildings and their exposure to flooding within Fitchburg's risk area is \$233,114,900 - \$21,637,900 in residential value, \$51,417,600 in commercial value, and \$29,644,200 in industrial value. A total of 784 parcels are in the 100- and 500-year flood zone and 15 percent of Fitchburg's property is at risk of flooding. There are 854 parcels that remain undeveloped, with 98 (19 percent) in flood zones. There are 360 parcels (1,334 acres) in the 100-year floodplain. Twenty percent of developable, vacant parcels are in the 100-year floodplain, and 19 percent are in the 500-year floodplain. Flood vulnerability could increase without proactive action to mitigate risk.

Fitchburg is vulnerable to climate change. Officials, residents, and stakeholders identified areas of concern during the Hazard Mitigation Plan and Municipal Vulnerability Preparedness Plan processes, including specific areas vulnerable to severe weather, brush fires, and other inland-based disasters. Findings reiterated that many hazards Fitchburg experiences are projected to worsen due to climate change. The top hazards in the Community Resilient Building (CRB) Workshop were: flooding; severe thunderstorms, wind, and tornadoes; extreme temperatures; and nor'easters, ice storms, and severe snowstorms. Localized flooding at the North Nashua River presents a serious hazard. The surrounding areas need an emergency evacuation procedure. Between 2000 and 2019, Fitchburg had fourteen floods and flash-flood events. Although some of the events caused property damages, no deaths were reported. Fitchburg is a hilly city, which exacerbates drainage issues. The resizing of drainpipes in lower-lying areas was critical, requiring larger sizes to accommodate flash flooding. Flood hazards are linked to erosion, compromising water quality, slope stability, and building foundations, putting structures and populations near steep embankments at risk. Erosion also undercuts streambeds and scour around stream crossing, creating risks to roadways. Residents identified erosion near the airport and the South Wastewater Treatment Plant.












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

Many locally identified areas of flooding are in the CDBG target area. These areas are home to a large percentage of the City's LMI households and those most at risk in an emergency. The identified areas include the Fitchburg Municipal Airport, City Hall, the DPW Headquarters, the Senior

Center, Electrical Substation #4, The Arc of Opportunity, the Fitchburg-East Wastewater Treatment Facility, John Fitch Highway, Pearl Hill Road, Main Street, Princeton Road, Punch Brook, River Street at Wallace Road, Shea Street, Columbia Avenue/Dewey Street, Broad Street, Boulder Avenue, the Commuter Rail Station, the Homeless Shelter, and Riverfront Park. According to the plan, residents at higher risk during their day-to-day lives are even more vulnerable during an extreme event. Seniors, youth, people with disabilities, and LMI residents are considered the most vulnerable and at greater risk of isolation for various reasons, including lack of access to transportation, lack of social support, and limited English proficiency. Residents with barriers to building personal resilience (measure to counteract extreme weather) are also vulnerable, including those with limited incomes. Fitchburg also has several Environmental Justice (EJ) neighborhoods. EJ neighborhoods have one or more of the following characteristics: 47

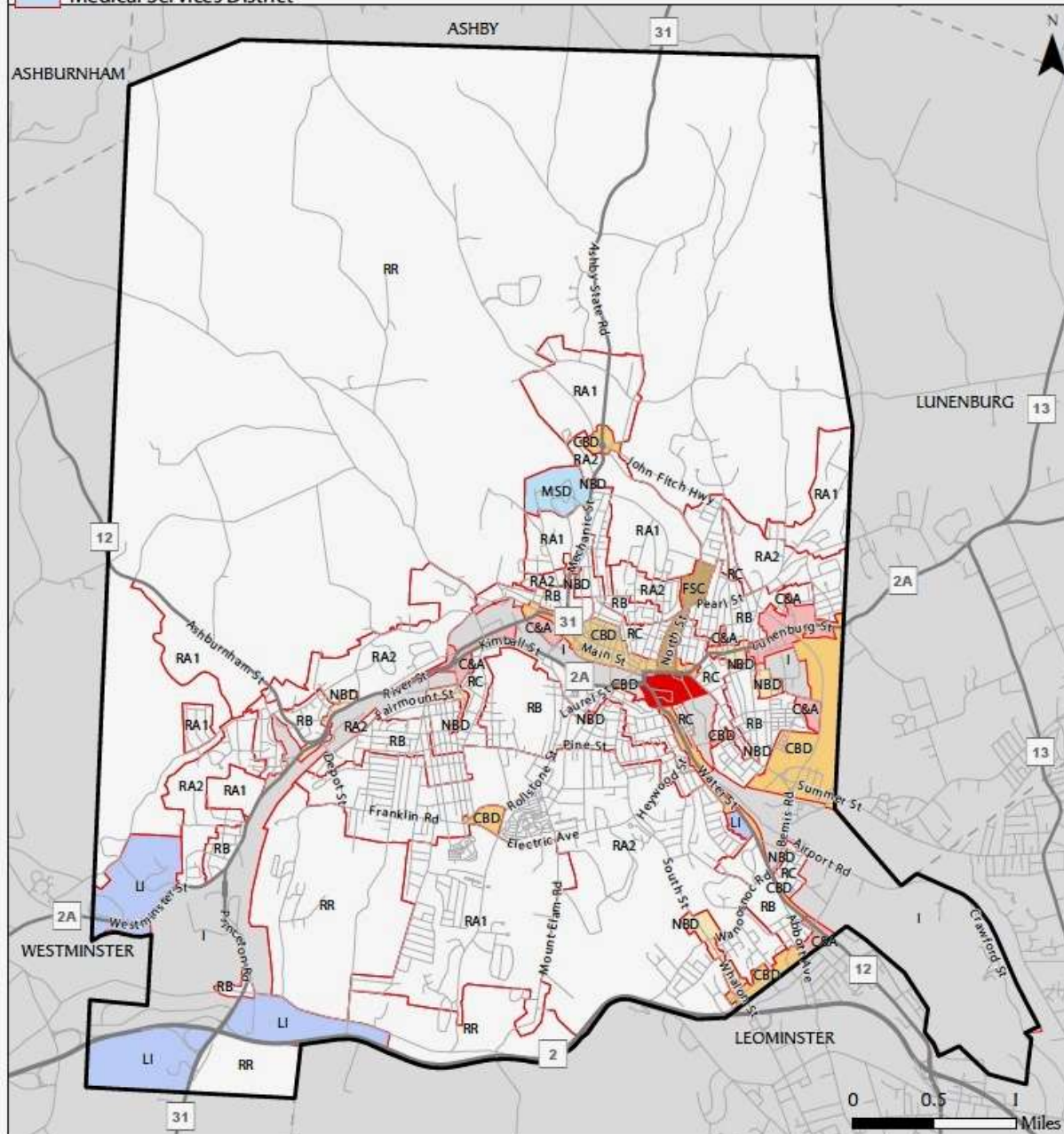
- Income: a block group whose annual median household income is equal to or less than 65 percent of the statewide median (\$62,072 in 2010);
- Minority: a block group with 25 percent or more of residents identifying as a race other than White; or
- English Isolation: a block group with 25 percent or more of households with no one over 14 who speaks English only or very well.

# City of Fitchburg Consolidated Plan

<b>Zoning</b>	 Neighborhood Business District
 Commercial & Automotive	 Residence
 Central Business District	 MassDOT Roads
 Fitchburg State University	 State Routes
 Industrial	 Non-numbered Roads
 Limited Industrial	
 Medical Services District	

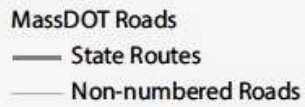


Source: City of Fitchburg, MassGIS,  
MassDOT, US Census Bureau ACS  
2015-2019, and HUD CHAS 2013-2017

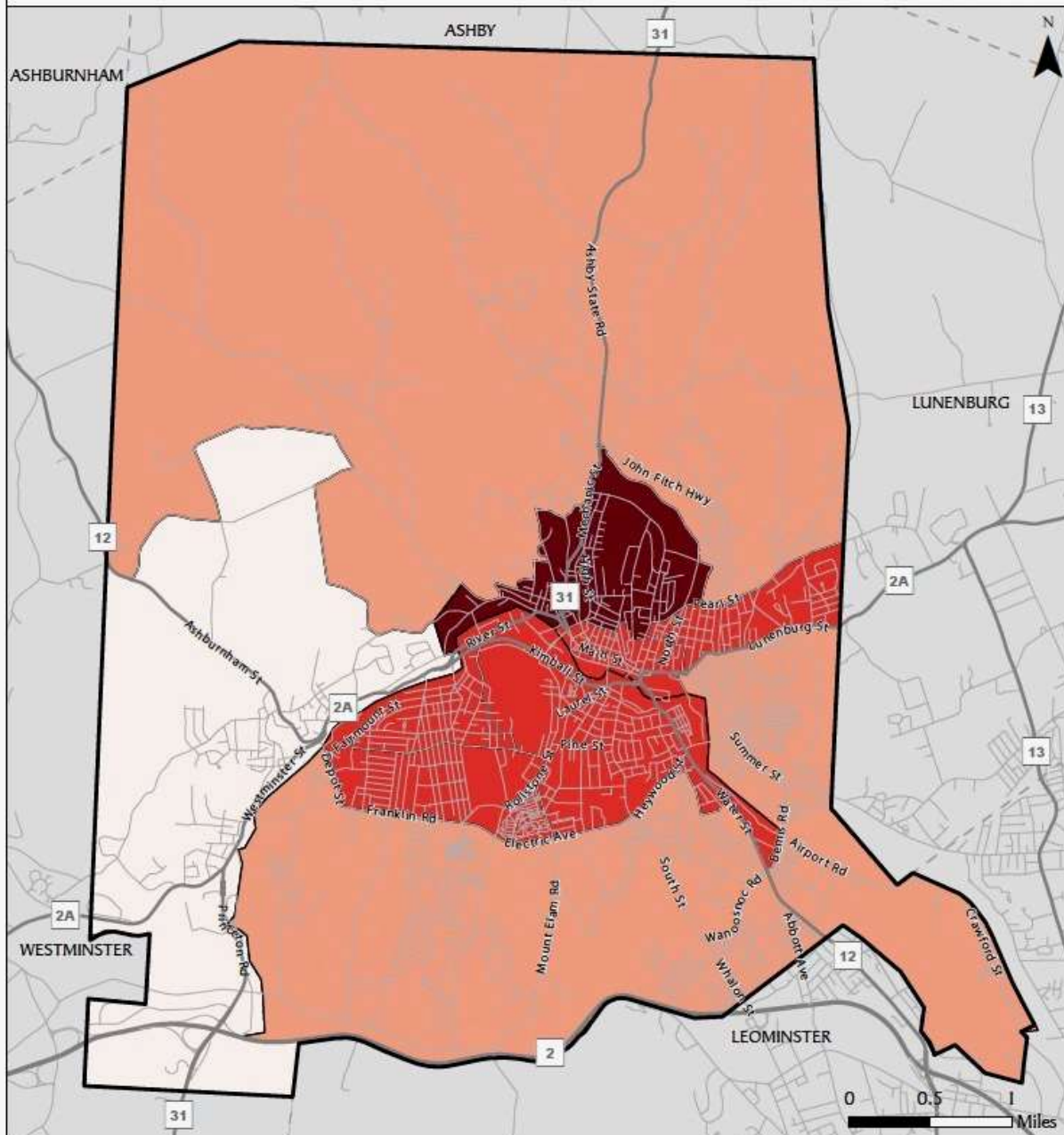


**Fitchburg Zoning Map**

# City of Fitchburg Consolidated Plan



Source: City of Fitchburg, MassGIS, MassDOT, US Census Bureau ACS 2015-2019, and HUD CHAS 2013-2017



Fitchburg Cost Burden Map

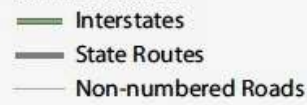


# City of Leominster Consolidated Plan

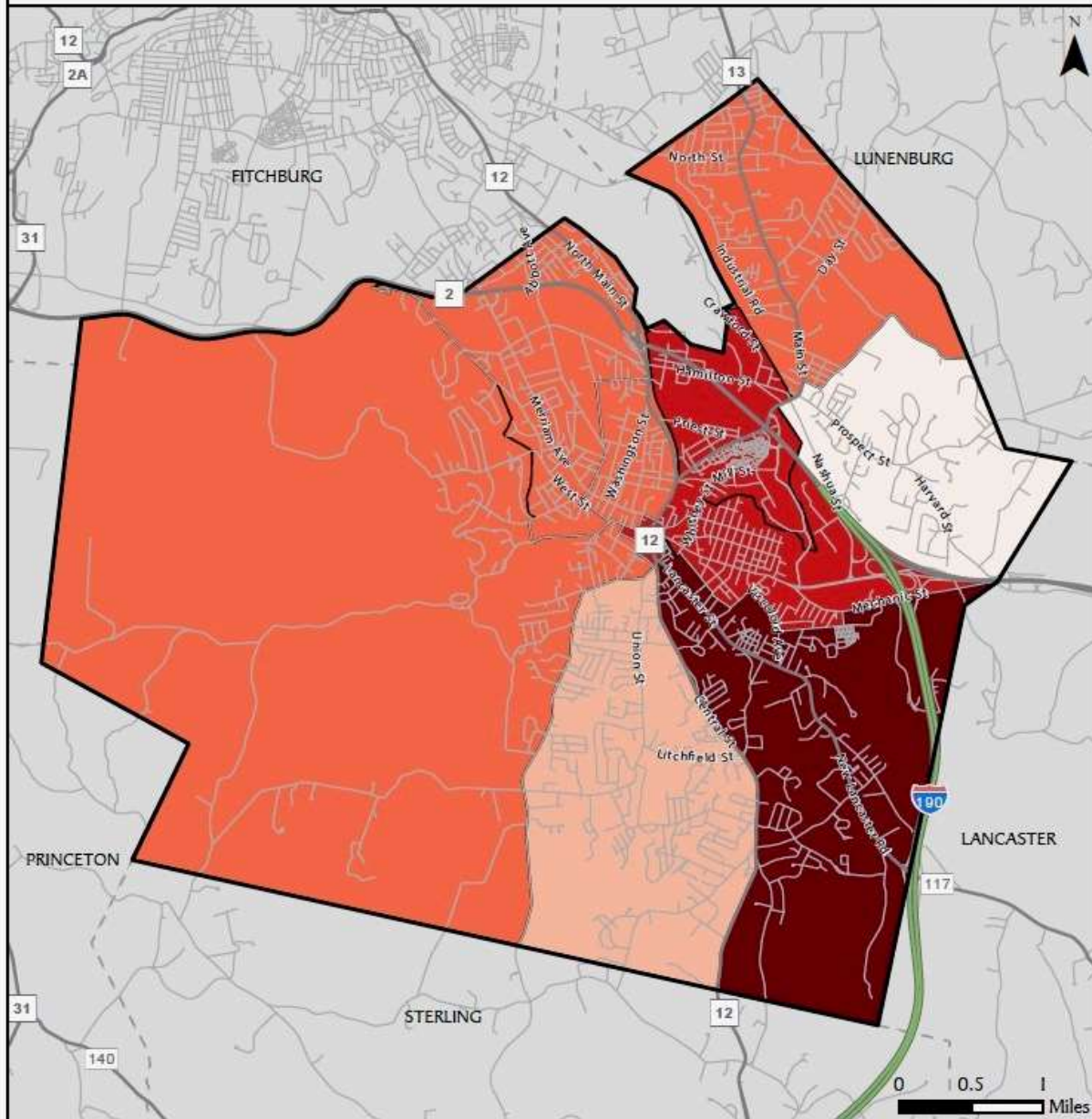
## Housing Cost Burden



## MassDOT Roads



Source: City of Leominster, MassGIS,  
MassDOT, US Census Bureau ACS  
2015-2019, and HUD CHAS 2013-2017



Leominster Cost Burden Map



# Strategic Plan

## SP-05 Overview

### Strategic Plan Overview

The Fitchburg-Leominster HOME Consortium's Strategic Plan will focus on developing eligible activities from 2022 to 2026. These activities primarily include affordable unit creation and preservation for LMI households, homeowner rehabilitation/repair, and clearance activity. Rental and homeownership rehabilitation continue to be priorities in the Consortium as the need for more affordable, accessible housing grows. Both communities' zoning allows for multifamily development, facilitating the rental development process. However, Fitchburg targets housing activities in the Housing Strategy Area, which comprises older urban neighborhoods with concentrated housing problems and the greatest need for rehabilitation. The City targets non-housing activities in the CDBG Strategy Area, consisting of Census tracts at least 52.7 percent of low-to-moderate income households.

Many eligible activities under the HOME program have been somewhat difficult to implement each year due to the difference between the funded allocation amount and the costs of these undertakings. Rehabilitation and quality requirements, as well as finding eligible purchasers, have been difficult in the past. The Consortium is also considering continuing programs that responded to needs associated with the COVID-19 pandemic, such as Small Business Assistance Grants. As a requirement of the HOME grant, there must also be a Community Housing and Development Organization (CHDO) set aside. The Consortium will work with its designated CHDO, NewVue Communities, to acquire and develop affordable, energy-efficient homes in areas where the housing market lacks the strength to attract private investment. The Consortium hopes that prioritizing such programs, and those outlined in this Consolidated Plan, will prevent displacement, build household wealth, welcome new opportunities, and restore units in poor condition to livable quality. The 2022-2026 Consolidated Plan aims to fund tangible, actionable activities and projects that will serve residents equitably and make programs more accessible to those in need.

The Citizen Participation process, data from the Needs Assessment and Market Analysis, the information provided by the Community Development and Planning Department (CDP), and feedback from the HOME Consolidated Plan Advisory Committee created the following priorities for this Plan, reiterated in sections SP-25, ES-05, and the PY48 AP-20. The priorities are listed with the understanding that the ability to meet them is affected by factors including the decreasing amount of HOME and CDBG funds over time, inflation, the labor movement, and beyond.

### HOME Priorities:

- Rehabilitation and/or Acquisition of Owner-Occupied and Rental Opportunities. The Consortium will commit available CDBG and HOME funds to assist LMI families through this

activity. Reductions in funding have caused the City to implement rehabilitation focusing on strategic investments: increasing accessibility, exterior improvements, lead paint abatement, and urgent repairs. These focus areas are intended to stabilize renter-occupied LMI neighborhoods by addressing physical defects, cost burden, and overcrowding. Annual goals are based on projects ready for funding in the upcoming program year. There is a continuing need for lead-free, accessible, safe, and affordable housing. The majority of the Consortium's housing stock in the geographic priority areas was built before 1978, indicating an increased likelihood of lead.

- Acquisition, Development and Rehabilitation by Non-profit Housing Providers to Create Long-Term Affordable Housing. The Consortium will work with nonprofit developers and NewVue Communities (CHDO) to acquire and rehabilitate substandard housing and develop new, accessible housing that creates long-term solutions for low, very low, and extremely low-income households. The Consortium will look for opportunities to develop capacity with nonprofit developers. The basis for this is to grow and diversify the housing stock to offer more suitable and code-compliant housing ready for occupancy, free from hazards, and has or is near to services, i.e., case management for those in need.
- PY48 HOME Priorities: The Consortium understands overcoming hardships presented by COVID-19 is a top priority for the PY48 Annual Action Plan (AAP). Eligible and impactful HOME activities, such as increasing housing production for homeless households and utility assistance, will have a higher priority in PY48, and likely into PY49.

#### **CDBG Priorities:**

- Public Services. The Consortium will commit available CDBG funds to provide mental health, substance use disorder, homelessness prevention, and youth services. Despite the 15 percent cap on the amount allocated to public services yearly, the Consortium recognizes the need for social service programs that address the root causes of poverty and homelessness and offer interconnected services. The Consortium, upon the recommendation of the Consolidated Plan Advisory Committee, will also prioritize public services that complement existing activities in Fitchburg and Leominster. Youth programs for elementary, middle school, and teen students should focus on the multiplier effect, prioritizing capacity and what is needed to keep kids engaged and empowered. The Advisory Committee mentioned pursuing activities related to arts and culture, including activities for LMI youth at the Fitchburg Art Museum.
- Economic Development. The Consortium will prioritize economic development that invests in human and intellectual capital, growing skills and providing resources to business owners to help them grow. The CDBG program will leverage funds to reach as many as possible in the target area. Upon consultation with the Advisory Committee, the most effective way is to continue the Revolving Loan Fund, utilize existing expertise, and invest in technical assistance over exterior upgrades. The Committee underscored the importance of investing in minority and women-owned enterprises and complementing existing projects with similar goals to move them along. Given the popularity of online shopping, commercial brick-and-mortar demand and the desire for more historically popular activities, such as storefront improvements, are not

the priorities they once were. Investment in technical assistance will “stretch” available dollars by helping business owners and entrepreneurs develop viable business plans that secure funding to revitalize storefronts, improve business districts, and create the tax base to sustain those efforts.

- PY48 CDBG Priorities. The City understands that overcoming the hardships of COVID-19 is a priority for the PY48 AAP. Eligible CDBG activities, such as the Microenterprise Business Grant Program and technical assistance for small businesses, will be prioritized in the first year of this Consolidated Plan. Businesses are beginning to recover and move to the area, and the Consortium wishes to build on that momentum through long-term investment strategies i.e., grants and microenterprise/small business loans.

### **Additional Text**

The Strategic Plan will address the following issues through the priorities and goals of this Consolidated Plan: the displacement of LMI populations; a limited affordable housing stock constrained by impacts of the market bubble; blight, vacancy/abandonment, and code enforcement; cost burden, concentrated housing problems, disproportionately greater instances of housing problems; and addressing the range of needs for the homeless/at-risk, those with mental illness, substance use disorders, and who are disabled. The Consortium will do this by creating more diverse, affordable housing for various household types, prioritizing special needs populations and the extremely low-income (<30 percent AMI) monitoring the effectiveness of activities supporting flexible activities that meet LMI and area benefit requirements, and collaborating with nonprofits.

## SP-10 Geographic Priorities - 91.415, 91.215(a)(1)

### Geographic Area

Table 47 - Geographic Priority Areas

1	<b>Area Name:</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Area Type:</b>	Local Target area
	<b>Other Target Area Description:</b>	
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	Comprehensive
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	The CDBG Target Area and CDBG Strategy Area comprise the central neighborhoods in and around Downtown, including Fitchburg State University, Cleghorn, Water and Elm Streets neighborhoods. The Housing Strategy area incorporates all areas where housing deterioration is evident in the City.
	<b>Include specific housing and commercial characteristics of this target area.</b>	The target area is an urban center with many vacant mill buildings and unused commercial space. The majority of the housing inventory in Fitchburg is pre- 1978 and therefore, at-risk for lead.
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	The CDBG Target Area and CDBG Strategy Area contain Census tracts where at least 51% of households are LMI. A community-wide survey was available to all residents and organizations representing/working in these areas to provide consultation for this plan. All advertising was publicly available, each meeting was open to the public, and translators were available upon request.
	<b>Identify the needs in this target area.</b>	Based on the CPP and data analysis, the greatest needs within the CDBG Target Area and CDBG Strategy Area include street improvements, mental health services, enforcement of building and health codes for substandard and vacant housing, and parks/recreation/ and open space improvement and maintenance. The area's percent of LMI population is at least 52.7%.

	<b>What are the opportunities for improvement in this target area?</b>	Opportunities for improvement are based on the continuation of Entitlement Programs. The city continues to seek alternative funding and match opportunities including local, state and federal resources whenever possible to improve the area
	<b>Are there barriers to improvement in this target area?</b>	The greatest barriers are the struggling local/regional economy, the limited housing stock, fragile market conditions, the limited federal and state funding, and limitations to implementation that address underlying conditions of poverty, including the Consolidated and Master plans.

## General Allocation Priorities

Describe the basis for allocating investments geographically within the state

Non-housing activities are targeted in the CDBG Strategy Area comprise several older neighborhoods. These areas contain Fitchburg’s highest concentrations of minority populations, substandard housing, aging infrastructure, and housing problems (as defined by HUD). According to the 2010 Census, LMI households comprise 71 percent of those in the CDBG Strategy Area, and LMI households comprise 52.7 percent of households citywide. HUD approval of CDBG Strategy Area is based on the 2010 U.S. Census. (Please note that Census 2020 results are not yet available at this time.). The map below shows updated LMI percentages based on American Community Survey (ACS) 2019 estimates. Examples of non-housing activities in the Strategy Area include public facilities and economic development projects.

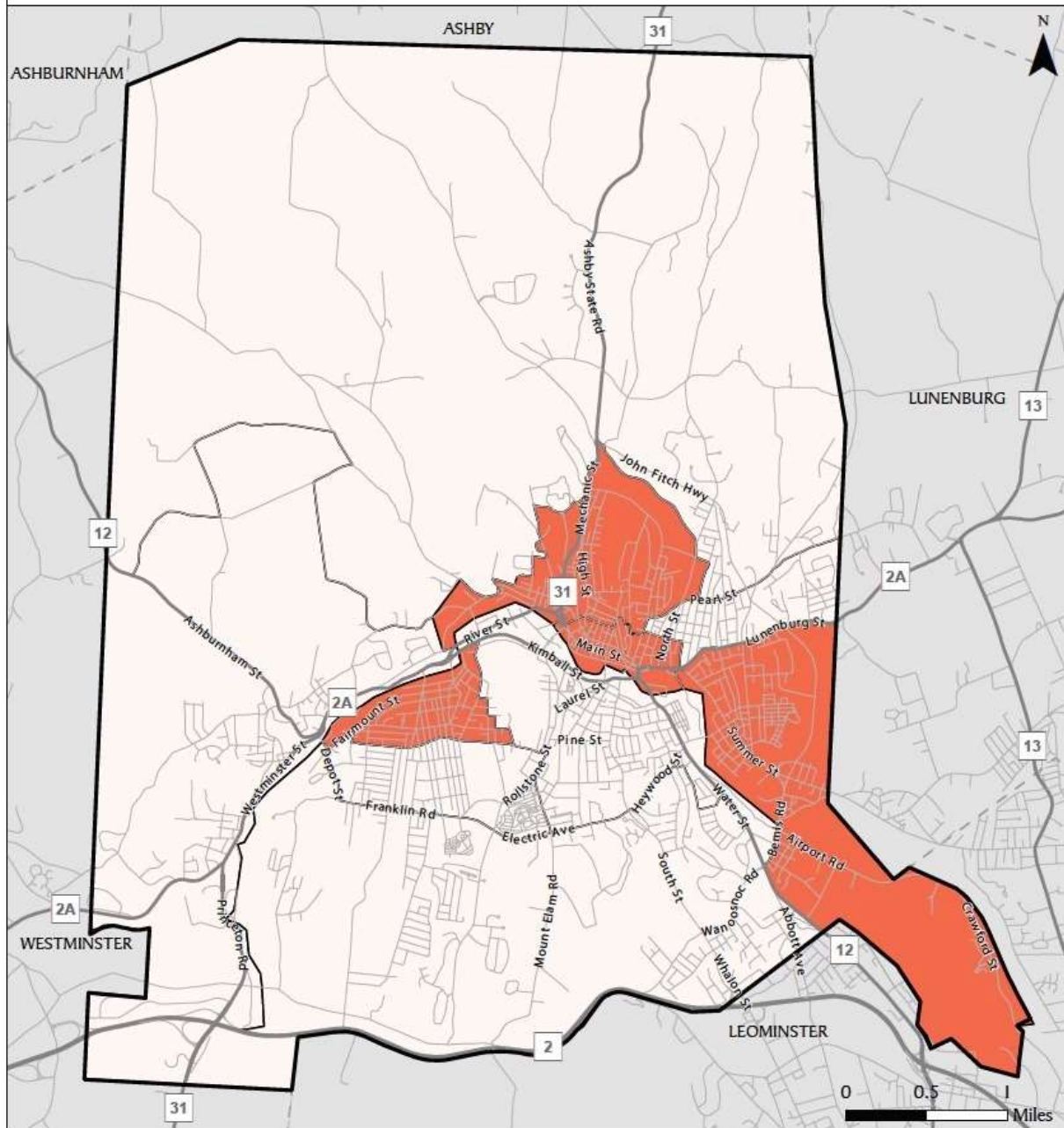
Fitchburg’s housing activities are targeted in the Housing Strategy Area, which comprises older urban neighborhoods. Leominster’s Comb and Carriage Core Area is their target area for housing activities and HOME funding. Both areas are within block groups identified as principally low- and moderate income and contain housing that exhibits the greatest need for rehabilitation/repair. Based on application submissions, the Consortium distributes homeowner rehabilitation funds to income eligible beneficiaries in these areas. Development incentives, referrals, and technical assistance to property owners and developers are also prioritized in these areas to ensure the timely expenditure of funds and compliance with written agreement requirements. Affordable housing is a widespread need across the Consortium, and there are often financial realities that make goals challenging. However, the Target Areas exhibit the highest needs, and through incentivization, the Consortium can integrate affordable housing more efficiently and help those most in need. Administration of the HOME program ensures each City is assisting their target areas equitably. Private and public rental subsidies provided by PHAs - except project-based – are not prioritized geographically. Fitchburg and Leominster’s PHAs serve their entire cities, but most LMI-occupied rental properties are in both cities’ target areas.

# City of Fitchburg Consolidated Plan

Low-Mod Income      MassDOT Roads  
 50.9% or less      State Routes  
 51% or more      Non-numbered Roads



Source: City of Fitchburg, MassGIS,  
 MassDOT, US Census Bureau ACS  
 2015-2019, and HUD CHAS 2013-2017



**Fitchburg LMI Map**

## SP-25 Priority Needs - 91.415, 91.215(a)(2)

### Priority Needs

Table 48 – Priority Needs Summary

1	<b>Priority Need Name</b>	Public Facilities and Infrastructure
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Public Housing Residents Persons with Physical Disabilities Non-housing Community Development Other
	<b>Geographic Areas Affected</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Associated Goals</b>	Public Facility Improvements
	<b>Description</b>	This priority includes but is not limited to streetscape improvements; sidewalk repairs; street beautification; park improvements and maintenance; ADA-compliant upgrades to community centers, senior centers, PHA properties, youth centers, and homeless shelters; and water/sewer and storm water infrastructure.
	<b>Basis for Relative Priority</b>	Consistent with the city's effort to improve public infrastructure and public facilities accessible and ADA-compliant, therefore available to all community members equitably.
2	<b>Priority Need Name</b>	Public Services
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents veterans Victims of Domestic Violence Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Non-housing Community Development Other
	<b>Geographic Areas Affected</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Associated Goals</b>	Public Services
	<b>Description</b>	This includes the prioritization of services relating to mental health, substance use, homelessness, youth, seniors, and other special need populations. Programs identified as priority needs were after school programs, mentorship programs, and public safety. The City recognizes the interconnectivity of certain issues on the cycle of poverty and is working toward eliminating those issues by providing various service programs, including programs that offer housing services. Provision of these services will focus on the most vulnerable populations in the City.
	<b>Basis for Relative Priority</b>	Consistent with findings from the data analysis, the CPP, and Advisory Committee meetings. The need responds to city and public desires to address mental health, substance use and homelessness, increase neighborhood-based services, and meet the needs for youth programming.
<b>3</b>	<b>Priority Need Name</b>	Economic Development
	<b>Priority Level</b>	High



	<b>Population</b>	Extremely Low Low Moderate Middle Non-housing Community Development
	<b>Geographic Areas Affected</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Associated Goals</b>	Economic Development
	<b>Description</b>	This includes expanding technical assistance opportunities, small business/microenterprise loans, and youth jobs/job training, particularly for the youth. COVID-19 significantly affected local businesses, and targeted funding/programming will be a high need for the first 1-2 years of this Consolidated Plan. This need also addresses neglected storefronts; business district appearance; neighborhood revitalization; and commercial rehabilitation particularly in Downtown. These activities have lower priority than technical assistance.
	<b>Basis for Relative Priority</b>	Consistent with findings from the data analysis, the CPP and meetings with the Advisory Committee. The need aligns with the city's efforts to create and retain employment opportunities and a skilled workforce, and the prioritization of technical assistance for businesses to grow, improve and upgrade aesthetically.
<b>4</b>	<b>Priority Need Name</b>	Emergency Shelter
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Chronic Homelessness Mentally Ill veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families
	<b>Geographic Areas Affected</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Associated Goals</b>	Emergency Shelter Program
	<b>Description</b>	To reduce individual and family homelessness by providing overnight shelter to families and individuals. The City and CoC are united in their mission to end homelessness by supporting nonprofit providers and shelters, minimizing trauma caused by homelessness, promoting access to programs, and optimizing self-sufficiency among individuals and families.
	<b>Basis for Relative Priority</b>	Consistent with findings from the data analysis, the CPP, and Advisory Committee meeting. The need aligns with the city's and nonprofit's efforts to address homelessness and chronic homelessness, and their contributing factors.
5	<b>Priority Need Name</b>	Clearance Activity
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Middle Non-housing Community Development Other
	<b>Geographic Areas Affected</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Associated Goals</b>	Clearance Activity
	<b>Description</b>	This priority helps revitalize neighborhoods and eliminate structures that have fallen into disrepair, primarily through demolition. These structures pose an imminent threat to public safety and contribute to the issues of slum and blight in LMI neighborhoods. Addressing this need helps restore neighborhood vitality.
	<b>Basis for Relative Priority</b>	Consistent with findings from the data analysis and the CPP. Historically high success rate in the City given existing market conditions. The need aligns with the city's efforts to revitalize neighborhoods and increase public safety by removing dangerous structures.
6	<b>Priority Need Name</b>	Rehabilitation and Preservation
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Elderly Frail Elderly Persons with Physical Disabilities
	<b>Geographic Areas Affected</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Associated Goals</b>	Rehabilitation and Preservation Rental Development by For-profit Developers Housing Program Delivery

	<b>Description</b>	This helps preserve and maintain the existing affordable housing stock, particularly units occupied by LMI individuals and families. The need also helps revitalize neighborhoods and preserve the physical/financial viability of existing housing by enforcing state sanitary and building codes.
	<b>Basis for Relative Priority</b>	Consistent with findings from the data analysis and the CPP. Historically high success rate in the City given existing market conditions. The need aligns with the city's efforts to revitalize neighborhoods and increase public safety through code enforcement.
<b>7</b>	<b>Priority Need Name</b>	Rehabilitation and/or Acquisition
	<b>Priority Level</b>	High
	<b>Population</b>	Low Moderate Large Families Families with Children Elderly Mentally Ill veterans Persons with HIV/AIDS Victims of Domestic Violence Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Other
	<b>Geographic Areas Affected</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Associated Goals</b>	Rehabilitation and/or Acquisition

	<b>Description</b>	This helps preserve and maintain existing affordable rental opportunities, particularly units occupied by LMI households. This priority also helps revitalize neighborhoods and preserve the physical/financial viability of existing rentals. The City will rehab/repair and maintain rental and ownership properties that are affordable and accessible to residents with a range of needs. The City hopes to grow the supply of housing in this manner, prioritizing improvements that address the most pressing needs.
	<b>Basis for Relative Priority</b>	Consistent with findings from the data analysis, the CPP, and Advisory Committee meetings. High success rate in the City given existing market conditions. Aligns with the city's efforts to revitalize neighborhoods, create healthier and more viable living environments for LMI households, grow the housing stock, and increase public safety through code-compliant housing.
8	<b>Priority Need Name</b>	Acq, Dev and Rehab by Nonprofit Housing Providers
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Large Families Families with Children Elderly Mentally Ill veterans Persons with HIV/AIDS Victims of Domestic Violence Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Other
	<b>Geographic Areas Affected</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Associated Goals</b>	Acq./Dev/Rehab by Non-profit Housing Providers

	<b>Description</b>	This priority helps to preserve and maintain the existing affordable housing opportunities, particularly units occupied by LMI households. Also revitalizes neighborhoods, preserves the physical and financial viability of housing, and expands reach by working with various providers. The City will work with partners to create long-term affordable housing solutions that are accessible, equitable and energy-efficient for LMI residents. The City hopes to grow the housing supply in this manner.
	<b>Basis for Relative Priority</b>	Consistent with findings from the data analysis, the CPP and Advisory Committee meetings. High success rate in the City given existing market conditions. Aligns with the city's efforts to revitalize neighborhoods, create healthier and more viable living environments for LMI households, grow the housing stock, and increase public safety through code-compliant housing.
9	<b>Priority Need Name</b>	HOME Administration
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	<b>Geographic Areas Affected</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Associated Goals</b>	HOME Administration
	<b>Description</b>	Administration of HOME funds and planning activities/programs that leverage state and federal resources for housing efforts. COVID-19 has significantly affected LMI renters, and targeted funding/programming will be a high need for the first few years of this Consolidated Plan.
	<b>Basis for Relative Priority</b>	Consistent with the city's efforts to improve quality of life for all residents through the allocation of HOME funding to eligible programs.

10	<b>Priority Need Name</b>	CDBG Administration
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	<b>Geographic Areas Affected</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Associated Goals</b>	CDBG Administration
	<b>Description</b>	Administration of CDBG funds and planning activities/programs that leverage state and federal resources for housing and community development efforts.



	<b>Basis for Relative Priority</b>	Consistent with the city's efforts to improve the quality of life for all residents through the allocation of CDBG funding to eligible programs.
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### **Narrative (Optional)**

The Consortium focuses on creating affordable housing despite a variety of unique challenges. Housing creation, preservation, and rehabilitation through acquisition and nonprofit partnerships are the most effective methods to address the needs of the Consortium's special needs populations, those in need of supportive/transitional housing, and LMI households. They are also the most effective methods to grow the number of households, diversify the housing stock, build household wealth, and boost the local economy. By pursuing these strategies, the Consortium affiliates its efforts with the outcomes identified in HUD's Community Planning and Development (CPD) Outcome Performance Measurement System: providing decent housing, creating suitable living environments, and creating economic opportunities. However, cost burden continues to be a concern despite the area's relative affordability compared to the state. This concern is attributed to lower weekly wages, an isolated location, a 7.1 percent unemployment rate, slow recovery from the Great Recession (2008), and the exacerbated cost burden of homes needing numerous, high-level updates.

City staff sent Community Needs Surveys to residents, providers, and other stakeholders as part of the CPP. The survey asked participants to rank needs according to priorities. The top needs in both communities were street improvements, mental health services, building and health code enforcement for substandard/vacant housing, youth centers, after-school services for elementary-aged children, and improvements to the appearance of business districts. Other high-ranking needs included code enforcement, sidewalk improvements, homeless facility improvements, and substance use treatment services. Please note that needs not addressed by CDBG or HOME funding may be addressed by other resources, including through other funding avenues and community partnerships.

## SP-30 Influence of Market Conditions - 91.415, 91.215(b)

### Influence of Market Conditions

<b>Affordable Housing Type</b>	<b>Market Characteristics that will influence the use of funds available for housing type</b>
Tenant Based Rental Assistance (TBRA)	COVID-19, its aftermath, and limited availability of affordable rentals to those who are truly LMI will influence available TBRA funds. The “hot” Greater Boston housing market has resulted in higher income limits determined by a high Area Median Income; this often does not reflect the realities for Fitchburg’s LMI population.
TBRA for Non-Homeless Special Needs	COVID-19, its aftermath, and limited availability of affordable rentals to those who are truly LMI will influence available Non-Homeless Special Needs TBRA funds. The “hot” Greater Boston housing market has resulted in higher income limits determined by a high Area Median Income; this often does not reflect the realities for Fitchburg’s LMI population.
New Unit Production	The Consortium’s recovering housing market will influence the use of available funds for new unit production. The high costs of construction and the limited income derived from projects will also influence available funds and willingness of developers. Ultimately, this could cause a reliance on co-funding from multiple sources for future projects.
Rehabilitation	Rehabilitation of the Consortium’s older housing stock is expensive. Under HOME regulations, units must be brought up to code. These factors, coupled with the presence of lead paint, can pose challenges. However, the local housing market has a plethora of rental and ownership rehabilitation opportunities in Fitchburg. The City will continue to use a portion of its funding toward: strategic rehabilitation of affordable rental units, rehabilitation with non-profit providers, and acquisition and preservation where necessary.
Acquisition, including preservation	The housing market’s has created acquisition opportunities in Fitchburg for older structures that would otherwise sit vacant, unused, or be a public safety concern. Acquisition is often combined with rehabilitation to stretch the activity’s impact and the dollars as much as possible. The City will use a portion of its funding toward rehabilitation, in conjunction with acquisition and preservation. The recovery of the market in the City is ultimately the greatest influence on acquisition activities.

**Table 49 – Influence of Market Conditions**

## SP-35 Anticipated Resources - 91.420(b), 91.215(a)(4), 91.220(c)(1,2)

### Introduction

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

### Anticipated Resources

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

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

**Table 50 - Anticipated Resources**

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

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

- LIHTC or Historic Tax Credit projects. LIHTCs apply to acquisition, rehab, or new construction. Properties: Fitchburg Place, 4 Leighton Street, Yarn Works, Moran Square, and 10 Summer Street. Leominster properties: Silver Leaf, Riverside Village, Water Mills, Ivory Keys, and Carter School. 4 tracts qualify: 3 in Fitchburg (7105, 7107, and 7108) and 1 in Leominster (7094). The cities use LIHTCs to

designate Difficult Development Area(s). There are 12 DDAs in the Consortium. Under the Tax Credit program, a certified rehab project on income-producing property can receive 20% of the cost of certified rehab expenditures in credits.

- MassWorks Grants provide capital for infrastructure projects that accelerate housing, private development, and job creation. Fitchburg received \$3 mill for Downtown by supporting new housing/mixed-use, the Fitchburg Theater rehab, converting Main and Boulder St. for safety. The project generated 182 units and commercial opportunities. Leominster received \$2.5 mill for Whitney Field including the Mall expansion.

#### HOME and CDBG match:

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

- DHCD has matched CDBG to expand the 40R district

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

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

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

**Discussion**

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

## SP-40 Institutional Delivery Structure - 91.415, 91.215(k)

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

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
FITCHBURG	Government	Economic Development Homelessness Non-homeless special needs Ownership Planning Rental neighborhood improvements public facilities public services	Jurisdiction
Fitchburg Housing Authority	PHA	Homelessness Non-homeless special needs Planning Public Housing Rental	Jurisdiction
NewVue Communities, Inc.	CHDO	Non-homeless special needs Ownership Planning Rental neighborhood improvements	Jurisdiction
Worcester County Continuum of Care		Homelessness public services	Region

**Table 51 - Institutional Delivery Structure**

### Assess of Strengths and Gaps in the Institutional Delivery System

The Consortium has a network of highly experienced housing and service agencies to address needs through its institutional structure. A cooperative infrastructure exists between the City of Fitchburg, the FHA, nonprofit organizations, local developers, and beyond. These groups collaborate to secure permanent, safe, and affordable housing for those with the greatest need. The Consortium was formed based on the desire to collaborate, share resources, and strategically plan for the future of the

Twin Cities. This effort, beginning over 20 years ago, required the participation and support of housing agencies, advocates, City and state officials, and private citizens who remain involved today.

The Consortium staff, the Montachusett Regional Planning Commission, the Consolidated Plan Advisory Committee, and other partners coordinate strategies, actions, and resources to meet the goals of the Five-Year Consolidated Plan and Annual Action Plans. The Advisory Committee comprises individuals representing nonprofit developers, service agencies, local volunteers, City officials, and more. The Planning Board monitors the development and implementation of the Annual Action Plans and serves as the resource for housing strategies. The City also provides technical assistance to local agencies and municipalities for affordable housing activities.

No known policies adversely affect housing costs or the incentives to develop, maintain, or improve affordable housing in the Consortium. The main obstacles to implementation are funding availability, the number of trained staff, adequate resources, and local developer capacity. The Consortium has identified three other areas that require ongoing attention: the interconnectivity between housing, the local economy, and the provision of services; addressing housing needs on a regional basis; and the effects of the slow market recovery on development.

#### **Availability of services targeted to homeless persons and persons with HIV and mainstream services**

<b>Homelessness Prevention Services</b>	<b>Available in the Community</b>	<b>Targeted to Homeless</b>	<b>Targeted to People with HIV</b>
<b>Homelessness Prevention Services</b>			
Counseling/Advocacy	X	X	
Legal Assistance	X		X
Mortgage Assistance	X		X
Rental Assistance	X	X	X
Utilities Assistance	X		X
<b>Street Outreach Services</b>			
Law Enforcement			
Mobile Clinics	X	X	
Other Street Outreach Services	X	X	X
<b>Supportive Services</b>			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	
Education	X	X	X
Employment and Employment Training	X	X	X
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X



Supportive Services			
Mental Health Counseling	X	X	X
Transportation	X	X	
Other			

**Table 52 - Homeless Prevention Services Summary**

**Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)**

The Consortium has several resources to provide targeted service to the homeless, particularly chronically homeless individuals and families, families with children, veterans and their families, unaccompanied youth, and those with HIV/AIDS. Emergency shelter providers include Our Father's House, Inc., YWCA of Central MA/Battered Women's Resources, Inc., South Middlesex Opportunity Council, Inc., LUK, Inc., and North Star Family Services. These resources service the entire Consortium, offering services in addition to those offered by the CoC. Supportive services help achieve housing stability, self-sufficiency, and employment. Case managers assist with financial management, tenancy issues, access to employment, transportation, food, medical care, and other programs in Table 22. Local governments, housing authorities, and other local stakeholders partner with the CoC and other regional resources to create affordable housing, particularly transitional and permanent supportive housing for homeless special needs populations. This support comes in the form of unit provision (family and elderly/disabled units), upgrades, and rental subsidies. Making Opportunity Count (MOC) offers specialized services for those with HIV/AIDS and who are homeless/at risk. Their CARE AIDS Supportive Housing Program provides prevention services for individuals living with HIV/AIDS and their families. Prevention services include housing search, rental start-up assistance, rent and utility arrearage, furnishing referrals, advocacy, landlord mediation, and eviction prevention. Lastly, UMass Memorial Medical Center in Fitchburg provides medical case management and peer support for persons with HIV/AIDS. The Consortium takes a comprehensive approach by investing CDBG in homelessness, emergency shelter, transitional/supportive housing, youth services and development, mental health, substance abuse treatment, and job creation. These efforts supplement HOME funds for LMI housing activities and encourage like-minded applicants to come forward.

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

Service providers, governments, and nonprofits in the Consortium maintain a collaborative approach to addressing homeless and non-homeless needs. Collaborators understand the importance of a coordinated approach to ending homelessness and the need to continuously work toward that goal. They prioritize the issue and provide permanent supportive housing, supportive transitional housing, and emergency shelter services to meet the needs. Collaborators attempt to educate and raise awareness around homelessness as much as possible, with most information sessions/activities open to

the public and, in some instances, free. Delivering services to homeless persons can be complicated by several barriers, including geography, limited public transportation, high costs of land and development, a recovering housing market, high rates of drug usage, lack of social services, a worker shortage and issues with vacancy/abandonment. Available services are struggling to keep up with demand. Low wages, a limited supply of quality housing, and a lack of services in surrounding communities exacerbate these challenges by stretching Fitchburg's resources. The Consortium's LMI populations are already finding it difficult to afford to live, even in relatively lower-cost areas. Those who are homeless or transitioning out of homelessness are more vulnerable to these challenges.

### **Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs**

Fitchburg has administered federal HOME funds since the program's adoption in 1993. The HOME program follows a comprehensive approach to identifying priorities and delivering services. The institutional structure for managing funds integrates key organizations to overcome gaps. To meet goals and priorities, funding recipients use services/resources from other agencies, private lenders, non-profits, and for-profits. Federal, state, and local agencies provide a portion of gap funding to support affordable housing and community development. They guide these activities through policies, program guidelines, and direct provision of housing units, vouchers, and services (PHAs). The City acts as the "investor" in the housing/community development service provided. Due to the high costs of construction and a small funding allocation, co-funding from multiple sources is required to address priority needs. Developers and service providers, in turn, develop projects/activities, offer supportive services, monitor ongoing activities, and influence the type of affordable housing built/services offered. Private lenders and banks also play an institutional role by providing financing and delivering mortgage services to investors. This relationship ultimately forms the basis of the delivery system. Major coordination is carried out by organizations receiving funds through the Consortium, with the City providing coordination and support to leverage/manage resources where needed.

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

## SP-45 Goals - 91.415, 91.215(a)(4)

### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Facility Improvements	2022	2026	Non-Housing Community Development	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide	Public Facilities and Infrastructure	CDBG: \$1,619,515	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 84500 Persons Assisted
2	Public Services	2022	2026	Non-Homeless Special Needs Non-Housing Community Development	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide	Public Services	CDBG: \$696,225	Public service activities other than Low/Moderate Income Housing Benefit: 18400 Persons Assisted  Homeless Person Overnight Shelter: 16 Persons Assisted  Homelessness Prevention: 50 Persons Assisted
3	Economic Development	2022	2026	Non-Housing Community Development	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide	Economic Development	CDBG: \$663,885	Businesses assisted: 50 Businesses Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Emergency Shelter Program	2022	2026	Homeless	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide	Emergency Shelter		
5	Clearance Activity	2022	2026	Non-Housing Community Development	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide	Clearance Activity	CDBG: \$400,000	Buildings Demolished: 20 Buildings
6	Rehabilitation and Preservation	2022	2026	Affordable Housing	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide	Rehabilitation and Preservation	CDBG: \$934,130 HOME: \$2,035,783	Rental units rehabilitated: 6 Household Housing Unit  Homeowner Housing Rehabilitated: 60 Household Housing Unit  Housing Code Enforcement/Foreclosed Property Care: 1000 Household Housing Unit
7	Rehabilitation and/or Acquisition	2022	2026	Affordable Housing	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide	Rehabilitation and/or Acquisition	HOME: \$342,365	Direct Financial Assistance to Homebuyers: 10 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	Acq./Dev/Rehab by Non-profit Housing Providers	2022	2026	Affordable Housing	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide	Acq, Dev and Rehab by Nonprofit Housing Providers	HOME: \$1,725,000	Rental units constructed: 20 Household Housing Unit
9	HOME Administration	2022	2026	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide	HOME Administration	HOME: \$567,514	Other: 1 Other
10	CDBG Administration	2022	2026	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide	CDBG Administration	CDBG: \$929,220	Other: 1 Other
11	Rental Development by For-profit Developers	2022	2026	Affordable Housing	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide	Rehabilitation and Preservation	CDBG: \$0 HOME: \$376,493	Rental units constructed: 8 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
12	Housing Program Delivery	2022	2026	Affordable Housing	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide	Rehabilitation and Preservation	CDBG: \$205,000	Other: 1 Other

**Table 53 – Goals Summary**

## Goal Descriptions

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

4	<b>Goal Name</b>	Emergency Shelter Program
	<b>Goal Description</b>	To reduce individual and family homelessness by providing overnight shelter to homeless families and individuals. Shelter related funding is included in public services.
5	<b>Goal Name</b>	Clearance Activity
	<b>Goal Description</b>	To revitalize neighborhoods and eliminate structures that have fallen into a state of disrepair, primarily through demolition. These structures pose an imminent threat to public safety and contribute to the issues of slum and blight in LMI neighborhoods. This activities is not funded in year one, but we anticipate funding this activity in the remaining 4 years of the plan. .
6	<b>Goal Name</b>	Rehabilitation and Preservation
	<b>Goal Description</b>	To preserve and maintain the existing affordable housing stock, particularly those units occupied by LMI individuals and families. Also, to revitalize neighborhoods and preserve the physical/financial viability of existing housing by enforcing state sanitary and building codes. Includes Code enforcement, critical home repair through Habitat for Humanity and The City's HOME and CDBG funded Homeowner Repair Program.
7	<b>Goal Name</b>	Rehabilitation and/or Acquisition
	<b>Goal Description</b>	To preserve and maintain the existing affordable ownership, particularly for acquisition and rehab of homeownership opportunities, and down payment assistance related to newly rehabbed or created homeowner units, Also, to revitalize neighborhoods and preserve the physical/financial viability of existing housing.
8	<b>Goal Name</b>	Acq./Dev/Rehab by Non-profit Housing Providers
	<b>Goal Description</b>	To preserve and maintain existing affordable rental opportunities, particularly units occupied by LMI households. Also, to revitalize neighborhoods and preserve the physical/financial viability of existing rentals, via partnerships with providers for long-term housing options. Presumes to rental conversion projects, funding 4 units each.
9	<b>Goal Name</b>	HOME Administration
	<b>Goal Description</b>	Administration of HOME funds and affordable housing activities that include grant writing to leverage other federal and state resources. This number includes \$263,268 of existing HOME admin from prior years, five times the current admin allocation of \$54,549 plus an estimate of \$30,000- 10% of the estimated program income to be received over the five years of the Con Plan.

10	<b>Goal Name</b>	CDBG Administration
	<b>Goal Description</b>	Administration of CDBG funds and planning activities that include grant writing to leverage other federal and state resources.
11	<b>Goal Name</b>	Rental Development by For-profit Developers
	<b>Goal Description</b>	To create affordable rental opportunities, particularly units occupied by LMI households. Also, to revitalize neighborhoods and preserve the physical/financial viability of existing rentals, via partnerships with developers for long-term housing options. Presumes two rental conversion projects by for profit developers, funding 4 units in each development.
12	<b>Goal Name</b>	Housing Program Delivery
	<b>Goal Description</b>	Funding supplements existing HOME admin to deliver housing related services, primarily the Homeowner Repair Program. Funding is estimated and is derived from the housing program's CDBG revolving loan funds. These funds are repayment of loans from the homeowner repair program.

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)**

The Jurisdiction will provide assistance to approximately 90 households of extremely low, low, and moderate-income through HOME- and CDBG-funded homeowner rehabilitation, buyer and rental activities (20 households per year). Of these households, 20 are expected to be extremely low-income, 5 are expected to be very low-income and 25 are expected to be moderate-income.



## **SP-50 Public Housing Accessibility and Involvement - 91.415, 91.215(c)**

### **Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)**

There are no voluntary compliance agreements in place for the Fitchburg or Leominster Housing Authorities to which this applies.

### **Activities to Increase Resident Involvements**

Each PHA adheres to the necessary state and federal compliance requirements for their developments. These requirements include those outlined in Section 504 Voluntary Compliance Agreements, those outlined in the Federal Fair Housing Act, and other specific housing regulations, as defined by HUD. Each PHA pursues different community-based and program-based activities to involve their residents. These activities mainly include public hearings and regular tenant meetings. These activities are outlined in detail on the PHAs' websites, in their annual reports (if required to publish one), and in their PHA Plan (for non-qualifying PHAs).

### **Is the public housing agency designated as troubled under 24 CFR part 902?**

No

### **Plan to remove the 'troubled' designation**

N/A

## **SP-55 Strategic Plan Barriers to Affordable Housing - 91.415, 91.215(h)**

### **Barriers to Affordable Housing**

Regulatory and administrative barriers to affordable housing exist at the federal, state, and local levels. Low wages, inaccessible employment opportunities, lack of public transportation, financial and legal policies around foreclosures, and bureaucratic red-tape exacerbate these barriers. There are fewer bureaucratic steps concerning affordable housing investment and development in Leominster. However, both cities continue to have a backlog of applicants for public housing. DHCD and HUD are aware of the shortcomings of the waitlist system. Both cities commissioned planning efforts to establish priorities and strategies and implement policies that remove or lessen obstacles and encourage investment in LMI neighborhoods. The Consortium recognizes that the shortage of affordable housing goes beyond supply-and-demand, as other factors relating to community development also play a role. Recent planning in Fitchburg includes the 2018 Economic Development Plan and their comprehensive zoning ordinance update. The Consortium promotes policies that positively impact the cost and availability of public housing and incentivizes the development and maintenance of the available supply. Current tax policies, building codes, fees/charges, and other Consortiums-based policies do not discourage affordable housing development. Recognizing this, the Consortium understands that federal, state, and regional policies have a role that trickles down to the local level and can create development challenges. A summary of those policies is here.

#### **FEDERAL GOVERNMENT POLICIES**

Housing policies implemented in the mid-twentieth century continue to hinder public housing development. A history of federal funding cuts, discrimination, and other issues throughout the twentieth and twenty-first centuries drastically disenfranchise investment and development in affordable housing, leaving state and local governments with limited resources. Reduction in rental and project-based assistance through the 1980s remains steadfast, prioritizing programs that assist wealthier homeowners (middle-class and higher) over lower-income renters, seniors, disabled persons, and other non-homeless special needs populations. Increases in construction and development costs and onerous federal regulations/regulatory review processes deter developers from producing affordable housing.

### **Strategy to Remove or Ameliorate the Barriers to Affordable Housing**

The Consortium's policies should encourage affordable housing creation, rather than passively "not discouraging" its development, as seen in the past. Both cities will advance incentives to develop, maintain, and improve affordable housing where possible throughout this Consolidated Plan period. They will also employ land and property tax policies, land use controls, zoning, building codes, fees/charges, and other related measures to make housing as affordable as possible within the

parameters of the market. Examples of local, state, and regional zoning policies that remove barriers to affordable housing in Fitchburg and Leominster include:

### Zoning Ordinances

Fitchburg's ordinance allows two-families by-right in the RB (Residential B) and RC (Residential C) districts, and by Special Permit in the CBD (Central Business District), NBD (Neighborhood Business), C (Commercial), and FSU (University) districts. Three-family and multifamily housing are allowed by Special Permit in the RB, RC, CBD, NBD, C, and FSU districts. Planned Unit Developments (PUDs) and Flexible Development, allowed by Special Permit in all twelve zoning districts, permit higher density and flexibility than is normally allowed in the underlying district. Fitchburg's ordinance permits two manufactured home parks. Leominster allows apartment/multifamily dwellings by Special Permit in the RB (Residence B), RC (Residence C), BA (Business A), BB (Business B), MU2 (Multi-Use 2), and V (Village) Districts. In each district, Planning Board Site Plan Approval is required.

### Inclusionary Zoning

Inclusionary zoning requires a percentage of units are allocated as affordable housing in new development. These allocations can be on-site or off-site. Many communities have adopted inclusionary bylaws that promoted mixed-income living. Organizations advocate for this style of development to create affordable housing for those at or below 80 percent AMI. Some inclusionary zoning regulations include units up to 120 percent AMI. Fitchburg and Leominster support and advocate for inclusionary zoning in City developments, particularly new developments in the Downtown.

### Accessory Dwelling Units (ADUs) and In-Law Apartments

ADUs are a low-impact, effective way to augment the housing stock and avoid displacement, particularly of elderly and disabled people in need of additional care and the low-income workforce. The American Planning Association (APA) defines ADU's as "smaller, independent residential dwelling unit located on the same lot as a stand-alone (i.e., detached) single-family home." Their applicability is far-reaching, allowing properties and outbuildings to become year-round affordable housing. Fitchburg allows ADUs by right in their RR and RA districts and by Boards of Appeals Special Permit in the RB district. Development of residential units by-right on the upper floors of Main Street is allowed. Leominster allows Accessory Apartments by Special Permit in the RR, RA, RB, and RC districts.

### **Additional Text: Barriers to Affordable Housing**

#### STATE GOVERNMENT POLICIES

The regional planning agency (Montachusett Regional Planning Commission) and various planning agencies and efforts reference the following state policies as strategies to forward affordable housing.

#### Massachusetts Chapter 40R

M.G.L Chapter 40R is a state law that establishes “Smart Growth” overlay districts that encourage communities to create dense residential or mixed-use zoning near transit stations, in areas of concentrated development, and other suitable locations. Chapter 40R incorporates a higher percentage of affordable housing in an area, with funding from the state to support these efforts. DHCD published a design standard guidebook for the program. Fitchburg currently has two approved 40R districts, and Leominster has none.

#### Massachusetts Chapter 40B

M.G.L Chapter 40B is a state statute enabling local Zoning Boards of Appeals (ZBAs) to approve affordable housing developments under flexible rules if at least 20 to 25 percent of the units have long-term affordability restrictions. The law gives developers the ability to override local zoning if the ten percent affordable threshold is unmet. A voluntary process under 40B is also available, known as the Local Initiative Program (LIP). The LIP program allows a government to use locally supported 40B developments and Local Action affordable units to meet the 10 percent threshold. Chapter 40B developments can be single-family homes, townhouses, duplexes, and condominiums. They can be sold as new units or resale units by current homeowners. This policy continues to receive pushback from many communities but is employed in both Consortium cities.

### **Additional Text 2: Barriers to Affordable Housing**

#### LOCAL GOVERNMENT POLICIES

Zoning and land use affect affordable housing costs and production. Several zoning policies exist to further affordable housing in the Consortium. Inclusionary Zoning Inclusionary zoning requires a percentage of units are allocated as affordable housing in new development. These allocations can be on-site or off-site. Many communities have adopted inclusionary bylaws that promoted mixed-income living. Organizations advocate for this style of development to create affordable housing for those at or below 80 percent AMI. Some inclusionary zoning regulations include units up to 120 percent AMI. Fitchburg and Leominster support and advocate for inclusionary zoning in City developments, particularly new developments in the Downtown.

#### Accessory Dwelling Units (ADUs) and In-Law Apartments

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by right in their RR and RA districts and by Boards of Appeals Special Permit in the RB district. Leominster allows Accessory Apartments by Special Permit in the RR, RA, RB, and RC districts.

#### Zoning Overlay Districts

Zoning Overlay Districts establish or modify development regulations such as dimensional and use requirements in underlying districts. Overlay districts can be for various purposes, such as expanding densities in Central Business Districts (CBDs) or protecting historic properties and environmental areas. Overlay districts commonly include provisions for creating affordable housing, such as density bonuses, greater height requirements, and mixed-use development. Examples of overlay districts in Leominster are the Downtown Overlay District, the Mechanic Street Overlay District, and the Urban Corridor Overlay District. Fitchburg has a Planned Development District, a Priority Development Site Overlay District, and a Smart Growth Overlay District that promotes housing via mixed-use and conversion.

#### Other

The Consolidated planning process outlined the following barriers to affordable housing development to monitor, research, and improve, while optimizing programming and funding:

- Community Opposition and NIMBYism;
- Public Infrastructure;
- Limited Transportation; and
- Resource Allocation.

#### **Additional Text: Strategy to Remove**

#### Zoning Overlay Districts

Zoning Overlay Districts establish or modify development regulations such as dimensional and use requirements in underlying districts. Overlay districts can be for various purposes, such as expanding densities in Central Business Districts (CBDs) or protecting historic properties and environmental areas. Overlay districts commonly include provisions for creating affordable housing, such as density bonuses, greater height requirements, and mixed-use development. Examples of overlay districts in Leominster are the Downtown Overlay District, the Mechanic Street Overlay District, and the Urban Corridor Overlay District. Fitchburg has a Planned Development District, a Priority Development Site Overlay District, and a Smart Growth Overlay District that promotes housing via mixed-use and conversion.

#### Building and Construction

The Consortium enforces the Massachusetts Building Code. Zoning and building codes and financial issues are often addressed when the cities work with developers. Issues can include incentives and fees associated with construction, such as building permits, sewer hookups, etc. Subsidies are common when creating affordable housing, triggering other federal and state requirements. These requirements, plus comprehensive permit requirements, can create issues if host communities and developers do not work together. Larger projects could trigger Section 3, M/WBE, Section 504, affirmative marketing plans, and other federal funding regulations. The Consortium works closely with developers to support affordable housing and facilitate the process as much as possible.

## **Additional Text 2: Strategy to Remove**

Massachusetts has a progressive housing agenda. Several laws, executive orders, and initiatives enacted in recent years encourage affordable housing throughout the Commonwealth. Efforts include the Housing Choice Initiative, which rewards municipalities for producing new units beyond a threshold quantity within the last five years and adopting best practices related to housing production that will sustain a twenty-first-century workforce and increase access to opportunities. At this time, Fitchburg is not a Housing Choice Community. There is also legislation focused specifically on financing, including Executive Order 215, Executive Order 74 as amended and revised by Executive Order 116, and the Interstate Banking Bill. Other examples include bills H.4536, H.3464, H.4134, and H.4108 that pertain to financing the production and preservation of housing for low- and moderate income residents. The Governor signed Bill H. 5250 in January 2021. Under the \$626.5 million economic development bill, the threshold for local boards to approve bylaw changes is a simple majority rather than a two-thirds supermajority. There will also be \$50 million put toward transit oriented development and \$40 million for the LIHTC Program. Massachusetts General Laws Ch.40B and Ch.40R are the most common mechanisms for advancing affordable housing objectives in the state. A brief overview of each is below.

### **Massachusetts Chapter 40R**

M.G.L Chapter 40R is a state law that establishes “Smart Growth” overlay districts that encourage communities to create dense residential or mixed-use zoning near transit stations, in areas of concentrated development, and other suitable locations. Chapter 40R incorporates a higher percentage of affordable housing in an area, with funding from the state to support these

efforts. Fitchburg's 40R districts require 20 percent affordability in developments. DHCD published a design standard guidebook for the program. Fitchburg currently has two approved 40R districts, and Leominster has none.

### **Additional Text 3: Strategy to Remove**

#### **Massachusetts Chapter 40B**

M.G.L Chapter 40B is a state statute enabling local Zoning Boards of Appeals (ZBAs) to approve affordable housing developments under flexible rules if at least 20 to 25 percent of the units have long-term affordability restrictions. The law gives developers the ability to override local zoning if the ten percent affordable threshold is unmet. A voluntary process under 40B is also available, known as the Local Initiative Program (LIP). The LIP program allows a government to use locally supported 40B developments and Local Action affordable units to meet the 10 percent threshold. Chapter 40B developments can be single-family homes, townhouses, duplexes, and condominiums. They can be sold as new units or resale units by current homeowners. This policy continues to receive pushback from many communities but is employed in both Consortium cities.

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

## **SP-60 Homelessness Strategy - 91.415, 91.215(d)**

Describe how the jurisdiction's strategic plan goals contribute to:

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

The most recent PIT confirms 169 chronically homeless people, 320 people with severe mental illness, and 237 people with a chronic substance use disorder. More recent numbers by CMHA reported 22 chronically homeless, 16 adults with mental illness, and 21 suffering from substance abuse. There is a need for partnership between shelters, services, and providers to address chronic homelessness, as it is often the result of other problems. The Consortium has an ongoing goal of supporting a viable CoC that implements strategies like "Housing First. Providers and safety officers conduct on-street outreach to connect unsheltered and the chronically homeless with shelter, health services, and case management for benefits enrollment, housing placement, and other services. Some participating agencies also have street outreach, including Our Father's House. These outreach staff are trained to interact with and assess unsheltered populations; staff engage those resistant to accepting housing or services. Additionally, a new provider network began meeting in 2021, helping fill the gap while conducting even more youth outreach.

Our Father's House implemented its outreach in 2010. The Street Outreach Team visits where homeless individuals frequent and assess the need for shelter, detox, hospital, food, etc. Outreach workers respond to calls for assistance from law enforcement, businesses, and citizens. The program offers referrals, crisis intervention, counseling, and case management to the unsheltered homeless. Workers are equipped with food, clothing, first aid, and referral information. They are prepared to assist those who have a mental health condition, living with substance use, or who have other unmet service needs by coordinating services. The Street Outreach Team will refer people in need to appropriate locations. The Veterans Outreach Center serves veterans and their families, providing transitional and PSH. Veterans, Inc. also receives additional referrals and has several housing sites across the state. A list of other providers conducting outreach is below:

- Our Father's House operates a mobile shower unit for the homeless in Fitchburg and Leominster.
- The YMCA of Central MA offers meals and showers to the homeless with the North Central MA Faith Based Community Coalition. Community Healthlink has a Community Healthlink Homeless Outreach and Advocacy Program that offers screenings, assessments, counseling, etc. to other support systems. Staff conduct outreach through shelters and emergency care. The program offers services such as 24-hour crisis assessment, intervention and stabilization with local agencies, healthcare providers, faith-based communities and local community organizations.
- The Fitchburg Human Rights Commission advocates on behalf of the unsheltered and sheltered homeless population and their needs.



- LUK Inc. offers various prevention, counseling, placement and support for youth, adults and families. Their placement programs assist at-risk and homeless youth as they transition from situations, offering stabilization, case management, and crisis and behavior management.
- According to City staff, a new network of providers began meeting in 2021 to fill in existing gaps.
- A temporary low-barrier shelter has been established at the Day's Inn in Leominster to minimize pandemic risks.
- SMOC offers programs for homeless households in the region (and across the state) including a variety of affordable and transitional housing, mental and substance abuse treatment, case management, and childcare.

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

The Consortium has one primary shelter (Our Father's House) with 28 beds and 2 overflow/vouchers. Our Father's House coordinates with providers to assist shelter guests exiting homelessness via Rapid Rehousing funds and offers 3 Rapid Rehousing adult beds funded by ESG. North Star Family Services (NSFS) operates the Consortium's primary emergency family shelter in Leominster, with a bed count of 20. This shelter is a group environment with daily meals and groceries. The YWCA of Central MA offers shelter, transitional housing, and case management for DV victims (including children) and those at-risk of homelessness. The short-term housing program provides access to affordable dormitory-style living from 2 months to 2 years; they offer 2 family beds and 5 adult beds. LUK, Inc.'s Crisis Center offers emergency and transitional beds for youth, plus scattered sites.

Fitchburg contains the majority of transitional housing. Our Father's House manages a family transitional housing program at Devens. This program is for homeless families headed by single women. There are 13 units and 7 scattered-site apartments in Fitchburg where family can stay for up to 4 months while receiving case management through MOC. Our Father's House manages the Elizabeth House in Fitchburg, which provides transitional housing and case management to homeless women in recovery. Elizabeth House has 12 adult beds. LUK Inc. has a transitional maternity program with 20 adult beds and a separate housing facility with 9 beds – 8 adult beds 1 one children's bed. Jeffrey's House, composed of 2 sober houses for those in recovery. For veterans exiting homelessness, the Veteran Homestead, Armistice Homestead, and the Hero Homestead. Veterans Homestead houses up to 12 residents in a mix of rooms and is for veterans living with medical and substance diagnoses. Armistice Homestead (Leominster) is a transitional housing facility that provides housing for sick and elderly veterans, or veterans with substance use disorder, mental illness, or medical issues. The Hero Homestead is a transitional sober living environment assisting veterans in meeting goals for reintegration.

The CoC's focus is using Housing First. CoC efforts include providing shelter and transitional housing, so while expanding the capacity of current shelters is a priority, allocation of limited resources leaves little room for expansion. The local emergency shelters and transitional housing continue to participate in

the HMIS, where client-level demographic data, assessments, configurations of beds, and openings/availability are tracked. Both Consortium communities will pursue activities to address the shelter and transitional housing needs of homeless individuals and families through CDBG funding.

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

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.**

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

- NSTS is working on a PSH project to help homeless persons entering independent living, in addition to outreach and shelter. LUK Inc. operates young adult Rapid Rehousing with 4 family beds and 3 adult beds through their Stabilization and Rapid Reintegration (STARR) Programs. They also have a shelter, transitional living programs, maternity group home programs, and TIL apartments
- Our Father's House operates the West Street Sober House, providing permanent housing to men in recovery
- SMOC operates scattered-site housing, a shelter, Leighton Street, Harmony House, and Hastings Hall. Leighton Street is a PSH facility for adults in recovery. Harmony House is PSH for men, and Hastings Hall is permanent adult SRO housing.
- The Fitchburg Veterans Service Office provides shelter, housing, and referrals. The City will refer individuals to the SHARP program. SHARP is a collaboration between DVS and the VA to end veterans' homelessness through peer support, mental health services, etc. The program sets clients up for long-term rehabilitation through HUD-VASH. The Fitchburg VA Office has an outpatient clinic.
- DTA's Fitchburg office offers cash assistance, benefits, Food Stamps/SNAP, emergency aid to elders/the disabled/children, and transitional aid to families. DTA provides shelter and emergency services to LMI families and homeless pregnant women.

- MOC offers services to homeless families in need of permanent housing, childcare, and employment. They follow up shelter to make sure they maintain their housing. MOC offers a Care AIDS Services Supportive Housing Program for the homeless living with HIV/AIDS and their families.
- Fitchburg/Leominster Public Schools have staff responsible for coordinating services for homeless students and their families
- The CoC, Community Foundation providers, City Councilors, state reps, and senators have initiated a Housing First working group to increase non-congregate housing for single individuals

The CoC administers CES to link households with housing, shelter, and services. The CES has access points for assessments/referrals. Certain points specialize in particular populations, but the CES follows No Wrong Door. No Wrong Door's policy is that no one will be denied. The homeless can present at any provider and access the CES at 40+ organizations. CMHA, the CES Lead, outreaches to agencies before bi-monthly Working Group meetings. Entry points ensure access for: adults with and without children; unaccompanied youth; veterans; young adults; households fleeing/attempting to flee DV; or persons at risk of homelessness. CoC's focus on these priority populations for PSH:

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

**Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs**

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

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

- CDBG and HOME support for administration and planning to continue these programs.

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

The CoC partners with a McKinney-Vento School Liaison in the Fitchburg Public Schools. There is also a regional liaison for Central Massachusetts. Liaisons identify unaccompanied homeless youth and offer them housing and stabilization. The McKinney-Vento Program also offers assistance with school supplies, backpacks, field trip payments, school pictures, and more. Provider organizations in the CoC, such as MOC and LUK Inc., work closely to get homeless children access to the services they need to succeed. NSFS has temporary housing assistance, assistance locating permanent housing, and daycare assistance as an alternative to shelters, so children can continue with school and adults can pursue job training.

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

## **SP-65 Lead-based Paint Hazards - 91.415, 91.215(i)**

### **Actions to address LBP hazards and increase access to housing without LBP hazards**

The Consortium will vigorously enforce the lead-based paint regulations for all its program activities. It will continue to support the efforts of local organizations to attract lead paint removal resources. Fitchburg has been taking steps to address lead-based paint hazards for several years. The City works with organizations to increase awareness of the dangers posed by lead paint by increasing code enforcement efforts and providing public funding to delead residential properties utilizing CDBG, HOME, and “Get the Lead Out” funding through the Massachusetts Housing Finance Agency.

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

### **How are the actions listed above related to the extent of lead poisoning and hazards?**

According to the information in Section MA-20, 66 percent of the Consortium’s homeownership stock and 81 percent of the rental stock was built before 1980, and the age of these units indicates a higher likelihood of lead-based paint, and consequently, an elevated risk of lead poisoning. Nine percent of ownership units and six percent of rental units were built before 1980 and are home to children under six. Section MA-20 shows that Fitchburg remains a high-risk community, with a poisoning incidence rate of 3.7 percent per 1,000. This issue is more prevalent in the CDBG Strategy areas, where older, substandard housing exists. The identification and abatement of lead-contaminated housing have been prioritized in the Consortium’s housing programs and code enforcement activities.

Although the City continues to work with the Massachusetts Childhood Lead Poisoning Prevention Program (CLPPP), there is concern over children at risk of lead poisoning or whose lead poisoning has not been identified. The Childhood Lead Poisoning Prevention Program defines lead poisoning as a blood lead level  $\geq 10$   $\mu\text{g}/\text{dL}$ . According to the most recent CLPPP data, five children in Fitchburg (0.4 percent) and zero children in Leominster had confirmed blood lead specimen  $\geq 10$   $\mu\text{g}/\text{dL}$  in 2018. However, 1.7 percent of children tested in Fitchburg and 1 percent in Leominster had blood capillary lead level results of 5-9  $\mu\text{g}/\text{dL}$  in their preliminary screenings. Combined with higher-than-average poverty rates and old housing stock, these figures contribute to Fitchburg’s high-risk status. According to the Massachusetts Environmental Public Health Tracking system, Fitchburg has lower screening rates for childhood blood lead than the state overall, with 65 percent of Fitchburg children screened in 2017, compared to 73 percent at the state level. Leominster screened 77 percent of children for lead in 2017.

## **How are the actions listed above integrated into housing policies and procedures?**

All Consortium-funded housing requires that properties meet the Massachusetts Lead Law requirements for containment or removal of lead-based paint. Fitchburg addresses all lead-based paint hazards in their Homeowner Rehabilitation programs. Participating applicants receive the EPA's "Protect Your Family from Lead in Your Home" and the "Lead-Safe Certified Guide to Renovate Right" brochures at the time of application. All rehabilitation projects/projects receiving rehabilitation assistance must comply with building codes per the Rehabilitation Standards policy. Building codes require the removal of lead-based paint hazards in units occupied by children under six, so the City must ensure all projects receive full rehabilitation, including lead inspection and risk assessment. Rental and ownership projects funded with HOME dollars must comply with the Rehabilitation Standards policy and abate any present hazards. HOME projects must meet requirements regardless of whether a child under six resides in the unit. CDBG-funded urgent repair and accessibility projects are reviewed on a case-by-case basis. Abatement in homes with no children/no children visiting regularly is reviewed based on the cost of the work, whether it is an emergency, and whether funding is available. Homeowner Rehabilitation projects eligible for Lead- Based Paint Hazard Control Funding are referred to the program standard procedure to maximize HOME and CDBG dollars.

## **SP-70 Anti-Poverty Strategy - 91.415, 91.215(j)**

### **Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families**

Eleven percent of the Consortium's families live below the poverty level - eleven percent in Fitchburg and ten percent in Leominster. Households provided with adequate assistance will have lower housing costs, giving them the ability to allocate resources to other needs and eventually move out of poverty. Recognizing that federal, state, and local resources inadequately address underlying causes of poverty, the Consortium invests CDBG funds in homelessness, emergency shelter, transitional and PSH housing, youth development, mental health, substance use treatment, and job creation. These efforts supplement HOME funds dedicated to LMI housing activities. Both encourage like-minded applicants to come forward. Through this Strategic Plan's implementation, the Consortium hopes to reduce the number of families with incomes at or below the poverty level, supporting the creation /expansion of affordable housing, reducing cost burden, and enabling households to meet other pressing financial obligations.

While the Consortium's programs and resources impact moving households out of poverty, other agencies have more targeted resources and specialize in addressing these issues. For example, DHCD offers holders of Section 8 vouchers in several PHA developments (Fitchburg Place, Ivory Keys, and the Yarn Hill apartments, to name a few) the opportunity to participate in the "Moving to Work" program. The program is designed to encourage voucher holders to become economically self-sufficient. As of PY47, CDBG funds FHA's ABLE program. Another example is the YMCA of Central MA Montachusett Branch, which offers financial assistance to community members, meal provision for the homeless, and financial assistance to families with children in Y Childcare. Both cities work closely with local food pantries, service providers, faith-based institutions, public safety, and other relevant groups to coordinate efforts and address the greatest needs concerning poverty-level families. The region's anti-poverty agency, Making Opportunity Count (MOC), has several programs and resources to reduce the number of poverty-level families in the Consortium:

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

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

### **How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan**

The City collaborates with groups and agencies to carry out its anti-poverty strategy and maximize efforts. In addition to MOC, the YMCA, and housing authorities, the Consortium works with the Community Reinvestment Act Coalition (CRA) for Central MA, NewVue, and the CoC for this. Most activities are coordinated with other policies/programs (CDBG), and expenditures. Staff partner with citizens, departments, and the public/private sectors to coordinate funds for LMI families in poverty to improve quality of life.

Currently funded CDBG and HOME that directly benefit households can mitigate the costs of critical home repair, code enforcement, lead abatement, self-sufficiency programs, case management, and health care. CDBG/HOME indirectly influence finances by reducing other costs through housing development, public facility/infrastructure improvements, counseling, and health care assistance. The following are likely to be funded by CDBG and HOME throughout this Consolidated Plan:

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

The Consortium will work to reduce poverty via the following actions, in coordination with this housing plan:

#### **Resource Allocation**

The Consortium will advocate for a larger share of resources for housing production, voucher programs, and social services at the state and federal level and funding for transitional housing, PSH, and emergency shelter.

#### **Policy and Programming**

The Consortium will have programmatic requirements consistent with other funders, especially DHCD. The Consortium will monitor subrecipients receiving CDBG and HOME for compliance. Planning



and Administration funds will be used for this. The Consortium will work with DHCD to develop deed restrictions that survive foreclosure, satisfy HOME regulations, and enable units to be counted on the Subsidized Housing Inventory (SHI).

#### Land Use and Zoning Policies

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

#### Staff Capacity

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

#### Public Education and Awareness

The Consortium will continue to educate the public on the need for and positive effects of affordable housing in the region through its activities and projects.

#### Development Capacity

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

## **SP-80 Monitoring - 91.230**

**Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements**

Fitchburg's CDP Department will continue to conduct program meetings during which the following will be addressed:

- Review of all active housing cases and issues, including codes and CDBG/HOME regulatory compliance;
- Review of all proposed projects for compliance with program priorities and conformance with
- Consolidated Plan goals and strategies, including timeliness of expenditures; and
- Review overall progress in meetings goals and strategies of the Consolidated Plan.

Final housing recommendations are subject to the review and approval of the CDP Director and the Director of Housing and Development. Individuals who disagree with a decision or other action may first appeal to the CDP Director and subsequently to the Planning Board at one of its monthly meetings. The Planning Board is a volunteer board appointed by the Mayor which provides an independent review of housing activities. Fitchburg and Leominster's CDBG and HOME-funded code enforcement staff will work with their building departments and other departments to ensure compliance with housing codes and other regulations/statutes.

Contractor advertisements related to housing rehabilitation include the statement: "Minority and women-owned contracting firms and Section 3 businesses (owned 51% or more by low or very low-income persons) are strongly encouraged to apply." In addition to regular meetings, the Department solicits citizen participation and comment on its performance in meeting its Consolidated Plan goals throughout the program year. Citizens and interested parties may offer comments at public hearings, etc. Any member of the public may review housing program policies and other information available at the Community Development and Planning Department. Fitchburg and Leominster participate in the CoC, which meets with agencies and individuals representing community needs, including those of LMI and special need populations.

The City funds anti-poverty agencies and those serving minorities, including NewVue (formerly known as the Twin Cities CDC). Income documentation is required for all job creation/retention activities and must include LMI percentages. The CDBG mailing list includes agencies representing minorities, low-income, and special needs populations. Performance Measurement is included in CDBG applications and monitoring forms. Annual Action Plans contain activity descriptions, outputs, and outcomes. CDBG/HOME staff monitor activities carried out under its programs.

The CDP Department uses a Program Monitoring and Fiscal Monitoring tool to conduct agency monitoring and a copy of the job creation/ retention forms used by CDBG subrecipients. An audit is required as part of the CDBG application process, reviewed upon receipt. The CDP Department's Director is responsible for ensuring information submitted to HUD through IDIS is correct and complete.

## Expected Resources

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

#### Introduction

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

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	929,220	240,000	27,367	1,196,587	4,251,348	Numbers are estimates only for remaining four years of the Con Plan. Annual allocations are expected to be divided as follows: 20% for Administration; 15% reserved for public services (not to exceed).
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	545,493	324,963	1,679,726	2,550,182	2,496,973	These numbers are estimates for the remaining four years of the Con Plan. Annual allocations are expected to be divided as follows: 10% for Administration; 15% reserved for CHDO; and the remaining for homeowner assistance, rental development and homeowner development activities. Please note- the amount available in year one is high, due to prior year resources.

**Table 54 - Expected Resources – Priority Table**

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

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

- LIHTC or Historic Tax Credit projects. LIHTCs apply to acquisition, rehab, or new construction. Properties: Fitchburg Place, 4 Leighton Street, Yarn Works, Moran Square, and 10 Summer Street. Leominster properties: Silver Leaf, Riverside Village, Water Mills, Ivory Keys, and Carter School. 4 tracts qualify: 3 in Fitchburg (7105, 7107, and 7108) and 1 in Leominster (7094). The cities use LIHTCs to designate Difficult Development Area(s). There are 12 DDAs in the Consortium. Under the Tax Credit program, a certified rehab project on income-producing property can receive 20% of the cost of certified rehab expenditures in credits.
- MassWorks Grants provide capital for infrastructure projects that accelerate housing, private development, and job creation. Fitchburg received \$3 mill for Downtown by supporting new housing/mixed-use, the Fitchburg Theater rehab, converting Main and Boulder St. for safety. The project generated 182 units and commercial opportunities. Leominster received \$2.5 mill for Whitney Field including the Mall expansion.

HOME and CDBG match:

- Inclusionary Zoning and Linkage Fees - under zoning, developments must provide on-site units for affordable housing. The cities may allow required units/lots off-site or contribute funds equal/greater in value. There is also interest in doing this with Habitat for Humanity. The Consortium will allocate HOME to mixed-income projects. HOME has leveraged \$514,900. Local funds will also support affordable housing via CDBG.
- The Consortium works with providers who offers grants to LMI households to lower energy costs. MOC operates the program with other funding; Fitchburg leverages via the Homeowner Rehabilitation Program.
- Under the MRVP, DHCD makes vouchers available to the homeless. The state provides vouchers for project and tenant-based opportunities with PHAs.
- Volunteer hours from Habitat for Humanity
- PHAs and the state provide a certain percentage of Housing Choice Vouchers for specific projects.
- The Consortium requests and investment in on- or offsite improvements from developers when working on HOME.
- Fitchburg's funding for the removal of lead-based paint, dust, and soil hazards have come from awards of public and private matching funds,

- Philanthropy and funds through the CoC. These resources can be donated materials; volunteer labor; value from land or real property; etc.
- CDBG funds match for Urban Renewal Funds. FRA received a 20-year commitment of funds. This will result in about \$30 million for implementation.
- Funding Fitchburg State for the North of Main Beautification Program PARC funding from the MA Office of EEA, the state earmarked funds from the Sam Pawlak Community Group.
- DPW and other staff apply for projects, matching CDBG with budget funding and other sources i.e., Safe Routes to Schools.
- State offices use CDBG for Complete Streets, brownfields, TDI, etc. MassDevelopment used tax credits with CDBG for Urban Fork.
- DHCD has matched CDBG to expand the 40R district

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

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

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

**Discussion**

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



## Annual Goals and Objectives

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

#### Goals Summary Information

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

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

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

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

**Table 55 – Goals Summary**

## Goal Descriptions

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

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

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

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

### Introduction

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

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

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

**Table 56 – Project Information**

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

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

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



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

**AP-38 Project Summary**  
**Project Summary Information**

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

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated NSFS will screen 200-250 referrals during the year, and expects to serve 10-15 Fitchburg families in the shelter and emergency services.
	<b>Location Description</b>	City of Fitchburg
	<b>Planned Activities</b>	The City will continue fostering relationships and providing funding to non-profit partners to end homelessness. The CDBG funds will be used to partially pay for the NSFS Operations Manager salary costs.
<b>3</b>	<b>Project Name</b>	Drug Enforcement and Patrol Program
	<b>Target Area</b>	CDBGTarget Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$60,385
	<b>Description</b>	This funding will provide police overtime expenses related to drug investigation activities in the CDBG Strategy Area and foot/motorcycle/bicycle patrols in the Main Street Area. This amount is available based on prior year resources and PY2022 grant funding.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is anticipated that 1,844 LMI individuals will benefit from the proposed project throughout PY48.
	<b>Location Description</b>	City of Fitchburg
	<b>Planned Activities</b>	The City will continue to conduct drug investigations, including surveillance, execution of warrants, arrests, and seizure of drugs, firearms, and U.S. currency.
<b>4</b>	<b>Project Name</b>	Small Business Technical Assistance
	<b>Target Area</b>	CDBGTarget Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Economic Development
	<b>Needs Addressed</b>	Economic Development

	<b>Funding</b>	CDBG: \$23,253
	<b>Description</b>	Program funds will provide outreach and technical assistance to businesses, as well as help leverage loans for small businesses. This amount is available based on prior year resources and PY2022 grant funding.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 40 businesses will be served (unduplicated count), 60 jobs will be created/retained, and 3 loans will be facilitated. Funds will be used to pay staff salary.
	<b>Location Description</b>	City of Fitchburg
	<b>Planned Activities</b>	The City will continue to support the business community, particularly in the Downtown, to prosper in the City, employ local workers, expand workforce development, and make aesthetic upgrades. NewVue has seen an increase in the need for intensive services for small business, and requests additional funds to meet this need for expanded support.
5	<b>Project Name</b>	Code Enforcement
	<b>Target Area</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Rehabilitation and Preservation
	<b>Needs Addressed</b>	Rehabilitation and Preservation
	<b>Funding</b>	CDBG: \$96,224
	<b>Description</b>	Program funds will be used to pay 100% of one existing full-time BOH Inspector positions and 50% of one full-time Clerk position. This amount is available based on prior year resources and PY2022 grant funding.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 200 housing units and 900 dwellings will be inspected in the CDBG strategy area.
	<b>Location Description</b>	City of Fitchburg

	<b>Planned Activities</b>	City staff will continue to work together to rehabilitate and inspect for code violations to improve the quality of housing and life for LMI neighborhoods. Through the enforcement of the State's Sanitary and Building Codes, Fitchburg's housing stock will be greatly improved.
<b>6</b>	<b>Project Name</b>	Street Outreach
	<b>Target Area</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$26,012
	<b>Description</b>	This funding will be dedicated to increasing the availability and accessibility of public services and programs throughout the City. This amount is available based on prior year resources and PY2022 grant funding
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is anticipated that 1,844 LMI individuals will benefit from the proposed project throughout PY48.
	<b>Location Description</b>	City of Fitchburg
	<b>Planned Activities</b>	The City will continue to foster relationships and provide funding to the Health Department specializing in public service provision.
<b>7</b>	<b>Project Name</b>	Critical Home Repair
	<b>Target Area</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Rehabilitation and Preservation
	<b>Needs Addressed</b>	Rehabilitation and Preservation
	<b>Funding</b>	CDBG: \$18,602
	<b>Description</b>	Critical Home Repair is exterior or interior work to alleviate critical health, life, and safety issues or code violations for homeowners in need.
	<b>Target Date</b>	6/30/2023

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Program funds will be used to fund 4-6 critical repairs in Fitchburg, serving 10 households.
	<b>Location Description</b>	City of Fitchburg
	<b>Planned Activities</b>	The City will continue to promote health and safety and improve the quality of life for those in the target area and across the City by removing blighted and dangerous buildings/housing units. Participants must own their own home and have a verifiable need that falls within scope and capabilities. The home must be a primary principal residence, current on mortgage, property taxes and insurance. Repairs must be necessary to function in the home and homeowners must partner with Habitat.
<b>8</b>	<b>Project Name</b>	CDBG Administration and Planning
	<b>Target Area</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Public Facility Improvements Public Services Economic Development Emergency Shelter Program Clearance Activity Rehabilitation and Preservation Rehabilitation and/or Acquisition Acq./Dev/Rehab by Non-profit Housing Providers HOME Administration CDBG Administration Rental Development by For-profit Developers
	<b>Needs Addressed</b>	Public Facilities and Infrastructure Public Services Economic Development Emergency Shelter Clearance Activity Rehabilitation and Preservation Rehabilitation and/or Acquisition Acq, Dev and Rehab by Nonprofit Housing Providers HOME Administration CDBG Administration

	<b>Funding</b>	CDBG: \$185,844
	<b>Description</b>	This funding will be used to administer the Fitchburg-Leominster HOME program and the City of Fitchburg CDBG program.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	Fitchburg-Leominster HOME Consortium, City of Fitchburg
	<b>Planned Activities</b>	The City will continue to administer and monitor program activities, leverage other grants through grant writing, and administer leveraged grants.
9	<b>Project Name</b>	Parks & Playgrounds
	<b>Target Area</b>	CDBGTarget Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Public Facility Improvements
	<b>Needs Addressed</b>	Public Facilities and Infrastructure
	<b>Funding</b>	CDBG: \$74,408
	<b>Description</b>	This funding will be used to improve and maintain park/recreation facilities and open space in the City to better nearby LMI neighborhoods and the population at-large. This amount is available based on prior year resources and PY2022 grant funding.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is anticipated that 8,450 LMI families will benefit from the proposed project throughout PY48.
	<b>Location Description</b>	City of Fitchburg
	<b>Planned Activities</b>	The City will continue to work with related organizations and departments to improve accessibility, make aesthetic upgrades, and promote active lifestyles for the community.
10	<b>Project Name</b>	Sidewalk Accessibility



	<b>Target Area</b>	CDBGTarget Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Public Facility Improvements
	<b>Needs Addressed</b>	Public Facilities and Infrastructure
	<b>Funding</b>	CDBG: \$39,994
	<b>Description</b>	This activity will improve sidewalk accessibility in Fitchburg.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is anticipated that 8,450 LMI families will benefit from the proposed project throughout PY48.
	<b>Location Description</b>	City of Fitchburg
	<b>Planned Activities</b>	The City will continue reviewing and approving funding applications for associated upgrades by City staff/departments.
<b>11</b>	<b>Project Name</b>	Streetscape Improvements
	<b>Target Area</b>	CDBGTarget Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Public Facility Improvements
	<b>Needs Addressed</b>	Public Facilities and Infrastructure
	<b>Funding</b>	CDBG: \$155,791
	<b>Description</b>	This funding will be dedicated to street and sidewalk improvements, including ADA-compliant upgrades, throughout the City. This amount is available based on prior year resources and PY2022 grant funding.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is anticipated that 8,450 LMI families will benefit from the proposed project throughout PY48.
	<b>Location Description</b>	City of Fitchburg
	<b>Planned Activities</b>	The City will continue reviewing and approving funding applications for associated upgrades by City staff/departments.
<b>12</b>	<b>Project Name</b>	Friends of the Abolitionist Park Phase III

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

	<b>Location Description</b>	City of Fitchburg
	<b>Planned Activities</b>	The City will continue reviewing and approving funding applications for associated upgrades by City staff/departments.
<b>14</b>	<b>Project Name</b>	Community and Development Department Public Art
	<b>Target Area</b>	CDBGTarget Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Public Facility Improvements
	<b>Needs Addressed</b>	Public Facilities and Infrastructure
	<b>Funding</b>	CDBG: \$18,602
	<b>Description</b>	The City will work with the Community and Development Department to beautify streetscapes, commercial centers, and LMI neighborhoods via public art.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is anticipated that 8,450 LMI families will benefit from the proposed project throughout PY48.
	<b>Location Description</b>	City of Fitchburg
	<b>Planned Activities</b>	The City will continue reviewing and approving funding applications for associated upgrades by City staff/departments.
<b>15</b>	<b>Project Name</b>	Fitchburg Farmers' Market
	<b>Target Area</b>	CDBGTarget Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$7,327
	<b>Description</b>	This funding will be dedicated to increasing the availability and accessibility of nutritional food services and programs throughout the City. This amount is available based on prior year resources and PY2022 grant funding.
	<b>Target Date</b>	6/30/2023

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is anticipated that 1,844 LMI individuals will benefit from the proposed project throughout PY48.
	<b>Location Description</b>	City of Fitchburg
	<b>Planned Activities</b>	The City will continue to foster relationships and provide funding to partners and service agencies specializing in health and wellness
<b>16</b>	<b>Project Name</b>	Spartacus
	<b>Target Area</b>	CDBGTarget Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$11,148
	<b>Description</b>	Program funds will be used to support staff salary of the Teen Center Spartacus Program, offering services to at-risk youth between the ages of 13 and 18 who live in Fitchburg.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 50 youth will be served between September and June.
	<b>Location Description</b>	City of Fitchburg
	<b>Planned Activities</b>	Emphasis will be on Youth Development, Healthy Living, and Social Responsibility through physical fitness, team building, life skills training, community service, and outdoor activities.
<b>17</b>	<b>Project Name</b>	Fitchburg Homelessness Prevention Project
	<b>Target Area</b>	CDBGTarget Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$10,219

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

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

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

	<b>Description</b>	Program funds will be used to support the salary of the Downtown Coordinator, who will assist in planning and coordinating Main Street projects and special events; assist in the development of a shared brand strategy for Downtown Fitchburg as both a college town and arts and culture destination.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	City of Fitchburg
	<b>Planned Activities</b>	This position will spend significant time on supporting microenterprises in the downtown and will work with Fitchburg State University.
22	<b>Project Name</b>	homeowner repair- rehab & preservation owner & tenant units
	<b>Target Area</b>	CDBGTarget Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Rehabilitation and Preservation
	<b>Needs Addressed</b>	Rehabilitation and Preservation
	<b>Funding</b>	CDBG: \$170,000 HOME: \$500,000
	<b>Description</b>	funding for homeowner rehabilitation, including full rehabilitation of homeowner units with HOME funds, strategic rehab of homeowner units with Revolving CDBG funds and rehabilitation of rental units in owner occupied properties with revolving CDBG funds
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The program anticipates assisting low-moderate income households, and estimates at least two of the households will be seniors.
	<b>Location Description</b>	Program will be available to income-eligible owner-occupied households throughout Fitchburg, but focused on the housing strategy area.



	<b>Planned Activities</b>	The homeowner repair program anticipates assisting 8 homeowners with full rehabilitation, 3 additional homeowners with strategic repair, and 2 tenants in owner-occupied housing with full rehabilitation. The program anticipates assisting low-moderate income households, and estimates at least two of the households will be seniors.
23	<b>Project Name</b>	homebuyer acquisition
	<b>Target Area</b>	CDBGTarget Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Rehabilitation and/or Acquisition
	<b>Needs Addressed</b>	Rehabilitation and/or Acquisition
	<b>Funding</b>	HOME: \$132,365
	<b>Description</b>	HOME funded down payment assistance for newly developed affordable housing.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 4-6 low to moderate families will be assisted through this funded.
	<b>Location Description</b>	The two locations for proposed projects are both in the housing strategy area, however if not all funds are used, we may use these funds City Wide as long as the buyers are income eligible.
24	<b>Planned Activities</b>	Provide down payment assistance to recently developed new, or rehabilitated housing for homeownership.
	<b>Project Name</b>	homebuyer development
	<b>Target Area</b>	CDBGTarget Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Acq./Dev/Rehab by Non-profit Housing Providers
	<b>Needs Addressed</b>	Acq, Dev and Rehab by Nonprofit Housing Providers
	<b>Funding</b>	HOME: \$300,000
	<b>Description</b>	funds will be used to develop homeownership opportunities by creating new housing. This is likely to be developed by Habitat for Humanity.
	<b>Target Date</b>	6/30/2024

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	We estimate between 2-4 low to moderate income families will be assisted through this housing development
	<b>Location Description</b>	Planned projects are located within the Housing Strategy area, however- should other opportunities arise with remaining funds- these projects can be anywhere in the City of Fitchburg.
	<b>Planned Activities</b>	Development of 2-4 units of new, energy efficient, homeownership for low to moderate income households, with Habitat for Humanity.
25	<b>Project Name</b>	rental development
	<b>Target Area</b>	CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Acq./Dev/Rehab by Non-profit Housing Providers
	<b>Needs Addressed</b>	Acq, Dev and Rehab by Nonprofit Housing Providers
	<b>Funding</b>	HOME: \$1,050,000
	<b>Description</b>	Development of new rental units by non-profit developers
	<b>Target Date</b>	7/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	We estimate very low, low, and moderate income households will benefit from this housing being developed in two projects. Five of the units assisted in the North Star Family Shelter Project will be specifically set aside for families living in shelter, ready to transition to permanent housing. The other five units to be funded will be in NewVue Communities Fitchburg Arts Community Rental Project and will have an "artist preference" but must otherwise meet the income requirements of the HOME program.
	<b>Location Description</b>	The North Star Family project (5) units will be on Marcello Ave in Leominster, MA. The NewVue Communities project will be at the former BF Brown school, at 188 Elm St. in Fitchburg- within the Housing Strategy area.

	<b>Planned Activities</b>	The North Star family project proposes to create 14 units of new construction family housing for families in their Shelter program, ready to move to permanent housing. The Fitchburg Arts Community Project proposed to convert a former school, BF Brown and two adjacent school buildings, the annex and the stables to 66 units of artist preference housing.
26	<b>Project Name</b>	rental rehabilitation by non-profits
	<b>Target Area</b>	CDBGTarget Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Acq./Dev/Rehab by Non-profit Housing Providers
	<b>Needs Addressed</b>	Acq, Dev and Rehab by Nonprofit Housing Providers
	<b>Funding</b>	HOME: \$250,000
	<b>Description</b>	This project proposes to assist the Fitchburg Housing Authority with two rehabilitation projects. One, a long vacant single family home owned by the FHA- this will be rented to a household. The second is a rehabilitation of the Green Acres housing development built in the 1960s. One-two units will be funded in this overall project.
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Three Low income families eligible for the Fitchburg Housing Authorities' public housing will be assisted through these projects
	<b>Location Description</b>	Both projects are on existing Fitchburg Housing Authority Property in the City of Fitchburg, one on Milk St. the Second at Green Acres on Normandy Rd.
	<b>Planned Activities</b>	The Fitchburg Housing Authority proposes to rehabilitate their Green Acres Village property, primarily with state funds. These are existing and occupied units in need of repairs- particularly around water mitigation and accessibility. The FHA also owns a long vacant, deteriorating single family home and proposes to rehabilitate this property as well.
27	<b>Project Name</b>	HOME Administration
	<b>Target Area</b>	CDBGTarget Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	HOME Administration

	<b>Needs Addressed</b>	HOME Administration
	<b>Funding</b>	HOME: \$317,817
	<b>Description</b>	administration of the HOME program
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	27 Households qualifying as income eligible for HOME program assistance. This number incorporates all HOME funded activities reported in other projects. This number is duplicative of those numbers.
	<b>Location Description</b>	The City of Fitchburg and Leominster.
	<b>Planned Activities</b>	Administration of HOME funded activities.
28	<b>Project Name</b>	Housing Program Delivery
	<b>Target Area</b>	CDBGTarget Area, CDBG Strategy Area, Housing Strategy Area, Citywide
	<b>Goals Supported</b>	Rehabilitation and Preservation
	<b>Needs Addressed</b>	Rehabilitation and Preservation
	<b>Funding</b>	CDBG: \$70,000
	<b>Description</b>	This fund supplements HOME administration funds in order to deliver our Homeowner Rehabilitation Program.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	13 income eligible families, it is estimated at least two will be elderly. This number duplicates the number of homeowner and rental units assisted in the homeowner rehabilitation program project.
	<b>Location Description</b>	The City of Fitchburg and Housing Strategy area.
	<b>Planned Activities</b>	Delivery of the homeowner rehabilitation program.

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

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

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

### Geographic Distribution

Target Area	Percentage of Funds
CDBG Target Area, CDBG Strategy Area, Housing Strategy Area, Citywide	100

Table 57 - Geographic Distribution

### Rationale for the priorities for allocating investments geographically

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

are distributed to income-eligible beneficiaries based on application submissions. The City prioritizes development incentives, referrals, and technical assistance to property owners and developers in this area to ensure the timely expenditure of funds and compliance with written agreement requirements.

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

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

## **Discussion**

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

## Affordable Housing

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

#### Introduction

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

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

**Table 58 - 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	5
Rehab of Existing Units	20
Acquisition of Existing Units	0
Total	25

**Table 59 - One Year Goals for Affordable Housing by Support Type**

## Discussion

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



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

### **Introduction**

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

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

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

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

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

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

lease enforcement, eviction, finances, and facilities management.

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

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

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

N/A

**Discussion**

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

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

### **Introduction**

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

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

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

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

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

Our Father's House Inc. implemented its outreach in 2010. The Street Outreach Team visits where the homeless stay and assess needs. Workers respond to calls for assistance from law enforcement, businesses, and citizens. The program offers referrals, crisis intervention, counseling, etc. to the unsheltered. Workers are equipped with food, clothing, hygiene supplies, etc. They are prepared to assist those with mental health issues, living with a substance use disorder, or who have other unmet

service needs by coordinating services. The Outreach Team will refer people to appropriate locations. The Veterans Outreach Center serves veterans and their families, providing transitional and PSH. Veterans, Inc. receives referrals and has several transitional and PSH sites across the state. A list of other providers conducting outreach is below:

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

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

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

The Consortium has one primary shelter for homeless individuals (Our Father's House) with 28 beds and two overflow/vouchers. Our Father's House coordinates with providers to assist shelter guests exiting homelessness via Rapid Rehousing funds from HUD and offers three Rapid Rehousing adult beds funded by state Emergency Solutions Grants (ESG) offered by Our Father's House. North Star Family Services (NSFS) operates the Consortium's primary emergency family shelter in Leominster, with a total bed count of 20. This shelter is a community living/group environment with daily meals and groceries. The YWCA of Central Mass offers emergency shelter, transitional housing, and case management for victims

of domestic violence (including children) and those at-risk of homelessness. The short-term housing program provides access to safe, affordable dormitory-style living quarters for two months up to two years; they offer two family beds and five adult-only beds. Lastly, LUK, Inc.'s Crisis Center in Fitchburg offers emergency and transitional beds for youths, plus scattered sites facilities.

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

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

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

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

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

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

- The CoC, Community Foundation providers, City Councilors, state reps, and senators have initiated a Housing First working group to increase non-congregate housing for single individuals

The CoC administers CES to link households with housing, shelter, and services. The CES has access points for assessments/referrals. Certain points specialize in particular populations, but the CES follows No Wrong Door. No Wrong Door's policy is that no one will be denied. The homeless can present at any provider and access the CES at 40+ organizations. CMHA, the CES Lead, outreaches to agencies before bi-monthly Working Group meetings. Entry points ensure access for: adults with and without children; unaccompanied youth; veterans; young adults; households fleeing/attempting to flee DV; or persons at risk of homelessness. CoC's focus on these priority populations for PSH:

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

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

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

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

HUD introduced the housing grant project called "Dedicated PLUS" to provide CoC's with the flexibility

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

The CoC partners with a McKinney-Vento School Liaison in the Fitchburg Public Schools. There is also a regional liaison for Central Massachusetts. Liaisons identify unaccompanied homeless youth and offer them housing and stabilization. The McKinney-Vento Program also offers assistance with school supplies, backpacks, field trip payments, school pictures, and more. Provider organizations in the CoC, such as MOC and LUK Inc., work closely to get homeless children access to the services they need to succeed. NSFS has temporary housing assistance, assistance locating permanent housing, and daycare assistance as an alternative to shelters, so children can continue with school and adults can pursue job training.

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

## **Discussion**

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



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

### **Introduction**

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

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

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

- Community Opposition and NIMBYism

- Land Use Policies
- Public Infrastructure
- Limited Transportation
- Resource Allocation

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

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

## **Discussion**

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

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

### **Introduction**

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

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

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

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

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

Whenever possible, the Consortium will work with non-profits, its two CHDOs, banks, developers, and other stakeholders to develop and certify viable affordable housing projects throughout PY48.

Coordination with local banks will focus on giving eligible homebuyers the ability to purchase a home

and ensure that it will be subject to any needed repairs at the time of purchase. Coordination with developers will focus on developing new housing and the maintenance of the existing stock. The Consortium advocates for mixed-income development and inclusionary zoning (a certain percentage of units within the development are affordable/workforce housing) and affordable development that is dense, mixed-use, and within proximity to services. Mitigation for the impacts of these developments usually comes in the form of a cash payment to be used by the municipality and other housing agencies to create affordable housing. Both Consortium cities are members of the local Community Reinvestment Act Coalition (CRA) for Central Massachusetts and work with the Coalition to further initiatives.

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

#### Resource Allocation

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

#### Policy and Programming

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

#### Land Use and Zoning Policies

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

#### Staff Capacity

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

## Public Education and Awareness

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

## Development Capacity

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

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

The Consortium will vigorously enforce the lead-based paint regulations for all its program activities. It will continue to support the efforts of local organizations to attract lead paint removal resources. Fitchburg has been taking steps to address lead-based paint hazards for several years. The City works with organizations to increase awareness of the dangers posed by lead paint by increasing code enforcement efforts and providing public funding to delead residential properties utilizing CDBG, HOME, and “Get the Lead Out” funding through the Massachusetts Housing Finance Agency.

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

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

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

While the Consortium’s programs and resources impact moving households out of poverty, other

agencies have more targeted resources and specialize in addressing these issues. For example, DHCD offers holders of Section 8 vouchers in several PHA developments (Fitchburg Place, Ivory Keys, and the Yarn Hill apartments, to name a few) the opportunity to participate in the “Moving to Work” program. The program is designed to encourage voucher holders to become economically self-sufficient. As of PY47, CBDG funds FHA’s ABLE program. Another example is the YMCA of Central MA Montachusett Branch, which offers financial assistance to community members, meal provision for the homeless, and financial assistance to families with children in Y Childcare. Both cities work closely with local food pantries, service providers, faith-based institutions, public safety, and other relevant groups to coordinate efforts and address the greatest needs concerning poverty-level families. The region’s anti-poverty agency, Making Opportunity Count (MOC), has several programs and resources to reduce the number of poverty-level families in the Consortium:

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

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

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

Fitchburg has administered federal HOME funds for the Consortium since the adoption of the program in the 1990s, providing a comprehensive approach to identifying priorities and delivering services. The institutional structure for managing funds integrates key organizations to overcome gaps. To meet goals and priorities, funding recipients use services/resources from other agencies, private lenders, non-profits, and for-profits. Federal, state, and local agencies provide a portion of gap funding to support affordable housing and community development. They guide these activities through policies, program guidelines, and direct provision of housing units, vouchers, and services (PHAs). The City acts as the “investor” of the housing/community development service. Due to the high costs of construction and a

small funding allocation, co-funding from multiple sources is required to address priority needs. Developers and service providers, in turn, develop projects/activities, offer supportive services, monitor ongoing activities, and influence the type of affordable housing built or services offered. Private lenders and banks also play an institutional role by providing financing and delivering mortgage services to investors. This relationship ultimately forms the basis of the delivery system. Major coordination is carried out by organizations receiving funds through the Consortium, with the City providing coordination and support to leverage/manage resources where needed.

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

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

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

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



Both cities have needs for health, housing, and social services, verified in the surveys and focus groups. Agencies reported affordable housing and access to services are top among LMI and ESL populations. Most providers are self-sufficient but the CD Department coordinates with them on community development. Fitchburg works with providers, agencies, and health providers to improve quality of life. The CD Coordinator participates in meetings, provides technical assistance, and coordinates information. The CD and Planning Dept. is updated on resources used to assist those in need. Staff educate leadership and advocate for changes. They work with boards, commissions, etc. to connect work and achieve goals. The Health Dept., Building Comm, Police, Fire, Mayor's Office, CD and Planning Department, Treasurer's Office, and Solicitor collaborate on the Problem Property Task Force meetings to discuss solutions. Many housing projects work with nonprofits to assist residents. They are connected and are often members of committees. For example, FHA offers wellness programs and social opportunities at their properties. The Daniel Heights Tenant Association works with the community on initiatives. FHA partners with the MOC for heating upgrades and weatherization programs.

## **Discussion**

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

## **Program Specific Requirements**

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

#### **Introduction**

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

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

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

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

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

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

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

The PJ has also earmarked \$432,365 in HOME funds for homeownership development, rehab and down payment assistance. The City is currently selling through RFP, two adjacent buildable lots on Taft Street, with requirements that the successful bidder be a non-profit creating at least two units of homeownership, we have allocated \$300,000 presuming the successful bidder is a reputable,

experienced developer whom the City can provide HOME funding to. We've also allocated \$72,365 in reserve to a potential NewVue Communities Project rehabbing a long vacant, blighted property at 4 Upton St. This project will soon be under construction through a program called Liabilities to Assets. Although NewVue has not yet requested funds, we anticipate they will need to request additional funds when bids come in. Lastly, we've allocated \$60,000 in HOME funds to provide down payment assistance to the buyers of these new homeownership developments.

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

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

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

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

**Other CDBG Requirements**

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

## **HOME Investment Partnership Program (HOME)**

### **Reference 24 CFR 91.220(l)(2)**

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

The Consortium has no plans to invest HOME funds in any form other than those described in the HOME Program Description. The principal proposed use of HOME funds (low interest or deferred loans to support new homeownership, existing homeowner or rental projects) is described in the HOME Program Description in the Attachment section of this Plan.

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

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

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

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

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

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

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

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

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

## Appendix - Alternate/Local Data Sources

1	<b>Data Source Name</b> Fitchburg & Leominster Housing Authority Data
	<b>List the name of the organization or individual who originated the data set.</b> The Fitchburg and Leominster Housing Authorities originated the data set.
	<b>Provide a brief summary of the data set.</b> This data set provides information about the various housing units that are managed by the Fitchburg and Leominster Housing Authorities.
	<b>What was the purpose for developing this data set?</b> This data set was developed to provide information about the various housing units that are managed by the Fitchburg and Leominster Housing Authorities.
	<b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b> The coverage of this administrative data is comprehensive and is concentrated in both the Cities of Fitchburg and Leominster.
	<b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b> This data set covers the year 2015.
	<b>What is the status of the data set (complete, in progress, or planned)?</b> This data set is complete.
2	<b>Data Source Name</b> 2000 U.S. Census and 2011 ACS
	<b>List the name of the organization or individual who originated the data set.</b> The data set was originated by the U.S. Census and the American Community Survey.
	<b>Provide a brief summary of the data set.</b> This data set provides information about the Cities of Fitchburg and Leominster.
	<b>What was the purpose for developing this data set?</b> This data set was developed to provide information about the Cities of Fitchburg and Leominster that was not available elsewhere in the Consolidated Plan.

	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>This data comprehensively covers the Cities of Fitchburg and Leominster.</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>This data set covers 2000 and 2011.</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>This data set is complete.</p>
3	<p><b>Data Source Name</b></p> <p>Homeless Facilities information from CMHA &amp; VHI</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>This data set was originated by the Cities of Fitchburg and Leominster.</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>This data set is a collection of data on beds in homeless facilities in Fitchburg and Leominster from the Central Massachusetts Housing Alliance (CMHA) and the Veteran Homestead, Inc.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>This data set provides information about beds in homeless facilities that was not available in the Integrated Disbursement &amp; Information System (IDIS), which was used to generate this Consolidated Plan.</p>
	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>The data covers the Cities of Fitchburg and Leominster.</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>The data provided by the CMHA was collected on February 25, 2015, and the data obtained from the Veteran Homestead, Inc. was obtained in December 2015.</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>The data set is complete.</p>
4	<p><b>Data Source Name</b></p> <p>City of Fitchburg Community Needs Survey</p>

	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>City of Fitchburg</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>141 people completed a Needs Assessment online survey between March 9 and March 24, 2021 - 115 responses for Fitchburg and 26 for Leominster). The survey link and QR code were circulated for widespread distribution by the Community Development Department. Hard copies of the survey were available upon request. There were no written responses to the survey collected from Fitchburg and nine from Leominster. Fitchburg's survey was translated into Spanish. Two shelters completed the shelter survey, and eighteen agencies completed the agency/provider survey. Those two surveys were also open from March 9 to March 24, and the link and QR code were circulated to the Community Development Department's compiled provider list. In each survey, there was collective agreement on the need for street improvement, mental health services, youth programming, blight removal, and homelessness prevention.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>To understand needs, issues, and priorities for the Consolidated Plan over the next 5 years</p>
	<p><b>Provide the year (and optionally month, or month and day) for when the data was collected.</b></p> <p>2021</p>
	<p><b>Briefly describe the methodology for the data collection.</b></p> <p>Online and mailer survey options, and paper versions available at City Hall. Also translated into Spanish.</p>
	<p><b>Describe the total population from which the sample was taken.</b></p> <p>Details of the population are in the PR-15 Citizen Participation section of the Consolidated Plan and attached to the Appendix.</p>
	<p><b>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</b></p> <p>Details of the population are in the PR-15 Citizen Participation section of the Consolidated Plan and attached to the Appendix.</p>
5	<p><b>Data Source Name</b></p> <p>Fitchburg/Leominster Community Needs Survey</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>Cities of Fitchburg and Leominster.</p>



	<p><b>Provide a brief summary of the data set.</b></p> <p>141 people completed a Needs Assessment online survey between March 9 and March 24, 2021 - 115 responses for Fitchburg and 26 for Leominster). The survey link and QR code were circulated for widespread distribution by the Community Development Department. Hard copies of the survey were available upon request. There were no written responses to the survey collected from Fitchburg and nine from Leominster. Fitchburg's survey was translated into Spanish. Two shelters completed the shelter survey, and eighteen agencies completed the agency/provider survey. Those two surveys were also open from March 9 to March 24, and the link and QR code were circulated to the Community Development Department's compiled provider list. In each survey, there was collective agreement on the need for street improvement, mental health services, youth programming, blight removal, and homelessness prevention.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>To understand needs, issues, and priorities for the Consolidated Plan over the next 5 years</p>
	<p><b>Provide the year (and optionally month, or month and day) for when the data was collected.</b></p> <p>2021</p>
	<p><b>Briefly describe the methodology for the data collection.</b></p> <p>Online and mailer survey options, and paper versions available at City Hall. Also translated into Spanish.</p>
	<p><b>Describe the total population from which the sample was taken.</b></p> <p>Details of the population are in the PR-15 Citizen Participation section of the Consolidated Plan and attached to the Appendix.</p>
	<p><b>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</b></p> <p>Details of the population are in the PR-15 Citizen Participation section of the Consolidated Plan and attached to the Appendix.</p>
6	<p><b>Data Source Name</b></p> <p>Fitchburg/Leominster 5-Yr Con Plan Agency Survey</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>Cities of Fitchburg and Leominster.</p>

	<p><b>Provide a brief summary of the data set.</b></p> <p>141 people completed a Needs Assessment online survey between March 9 and March 24, 2021 - 115 responses for Fitchburg and 26 for Leominster). The survey link and QR code were circulated for widespread distribution by the Community Development Department. Hard copies of the survey were available upon request. There were no written responses to the survey collected from Fitchburg and nine from Leominster. Fitchburg's survey was translated into Spanish. Two shelters completed the shelter survey, and eighteen agencies completed the agency/provider survey. Those two surveys were also open from March 9 to March 24, and the link and QR code were circulated to the Community Development Department's compiled provider list. In each survey, there was collective agreement on the need for street improvement, mental health services, youth programming, blight removal, and homelessness prevention.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>To understand needs, issues, and priorities for the Consolidated Plan over the next 5 years.</p>
	<p><b>Provide the year (and optionally month, or month and day) for when the data was collected.</b></p> <p>2021.</p>
	<p><b>Briefly describe the methodology for the data collection.</b></p> <p>Online and email distribution, also mentioned in public meetings throughout the process.</p>
	<p><b>Describe the total population from which the sample was taken.</b></p> <p>Housing and human service staff and local/regional providers.</p>
	<p><b>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</b></p> <p>Details attached to the PR-15 section of the Consolidated Plan and uploaded in the Appendix.</p>
7	<p><b>Data Source Name</b></p> <p>Fitchburg/Leominster 5-Yr Con Plan Shelter Survey</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>Cities of Fitchburg and Leominster.</p>

	<p><b>Provide a brief summary of the data set.</b></p> <p>141 people completed a Needs Assessment online survey between March 9 and March 24, 2021 - 115 responses for Fitchburg and 26 for Leominster). The survey link and QR code were circulated for widespread distribution by the Community Development Department. Hard copies of the survey were available upon request. There were no written responses to the survey collected from Fitchburg and nine from Leominster. Fitchburg's survey was translated into Spanish. Two shelters completed the shelter survey, and eighteen agencies completed the agency/provider survey. Those two surveys were also open from March 9 to March 24, and the link and QR code were circulated to the Community Development Department's compiled provider list. In each survey, there was collective agreement on the need for street improvement, mental health services, youth programming, blight removal, and homelessness prevention.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>To understand the needs, issues, and priorities for the Consolidated Plan over the next 5 years.</p>
	<p><b>Provide the year (and optionally month, or month and day) for when the data was collected.</b></p> <p>2021.</p>
	<p><b>Briefly describe the methodology for the data collection.</b></p> <p>Online and email distribution, also mentioned in public meetings throughout the process.</p>
	<p><b>Describe the total population from which the sample was taken.</b></p> <p>Emergency shelter staff and local/regional providers.</p>
	<p><b>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</b></p> <p>Details attached to PR-15 section of the Consolidated Plan and uploaded in the Appendix.</p>
8	<p><b>Data Source Name</b></p> <p>ACS Data</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>American Community Survey.</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>Updated population, household, and medium income data.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>To provide a clearer understanding of current conditions in the Consortium.</p>

	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>Data is concentrated in the Consortium communities.</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Complete</p>
9	<p><b>Data Source Name</b></p> <p>CHAS - Households with Children Present</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>CHAS Data published by HUD.</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>Crowding information for LMI households with children present by tenure.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>To complete the data with updated statistics. HUD does not pre-populate this table, but IDIS lets users enter the numbers. CHAS does not report the Consortium-wide statistics.</p>
	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>Data is concentrated in Fitchburg and Leominster among LMI households with children present.</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>2013-2017 ACS</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Complete</p>
10	<p><b>Data Source Name</b></p> <p>Cost of Housing ACS Data</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>American Community Survey data.</p>

	<b>Provide a brief summary of the data set.</b> Median home value and median contract rent data from the ACS.
	<b>What was the purpose for developing this data set?</b> To update "Table 26 - Cost of Housing" in MA-15.
	<b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b> The data is concentrated in the Consortium communities.
	<b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b> 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year).
	<b>What is the status of the data set (complete, in progress, or planned)?</b> Complete.

# City of Leominster Five-Year Consolidated Plan 2022- 2026 and Program Year 48 Annual Action Plan



**Presented to:**  
The Office of Community Development and Housing  
Leominster, MA

**Prepared by:**  
Barrett Planning Group LLC



## **Executive Summary**

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

#### **1. Introduction**

The U.S. Department of Housing & Urban Development manages the Community Development Block Grant (CDBG) and the HOME Investment Partnerships (HOME) Program. CDBG provides formula grants to "Entitlements" to develop viable urban communities through decent housing, a suitable living environment, and expanding economic opportunities for low- and moderate-income (LMI) persons. HUD awards CDBG funds to grantees to carry out activities such as affordable housing, economic development, and improving facilities and infrastructure for those most in need. HOME provides formula grants to states and participating jurisdictions (PJ's) that communities use, often in partnership with nonprofits, to fund activities such as building and rehabilitating housing for rent/ownership. As required by both programs, grantees must submit a 5- Year Consolidated Plan and Annual Action Plans (AAP's). Consolidated Plans cover goals and outcomes for the upcoming five-year period and includes:

- An overview of the City's housing and community needs based on data from HUD and other sources. The data, summarized in the Needs Assessment, determines projects and funding.
- The Strategic Plan, which outlines the goals and objectives of funded programs and actions.
- The Program Year 48 AAP that contains specific details, goals, and outcomes for the upcoming year. The Program Year 48 AAP, and the following AAPs between now and 2026, are rooted in the Strategic Plan.

Leominster is an Entitlement community, receiving CDBG funding from HUD and HOME funding as part of the Fitchburg-Leominster HOME Consortium. Fitchburg is the Consortium Lead, and Leominster is the Participating Grantee. As the Participating Grantee, Leominster's department oversees its portion of the Consolidated Plan, sharing information and managing its own program funding and AAP's.

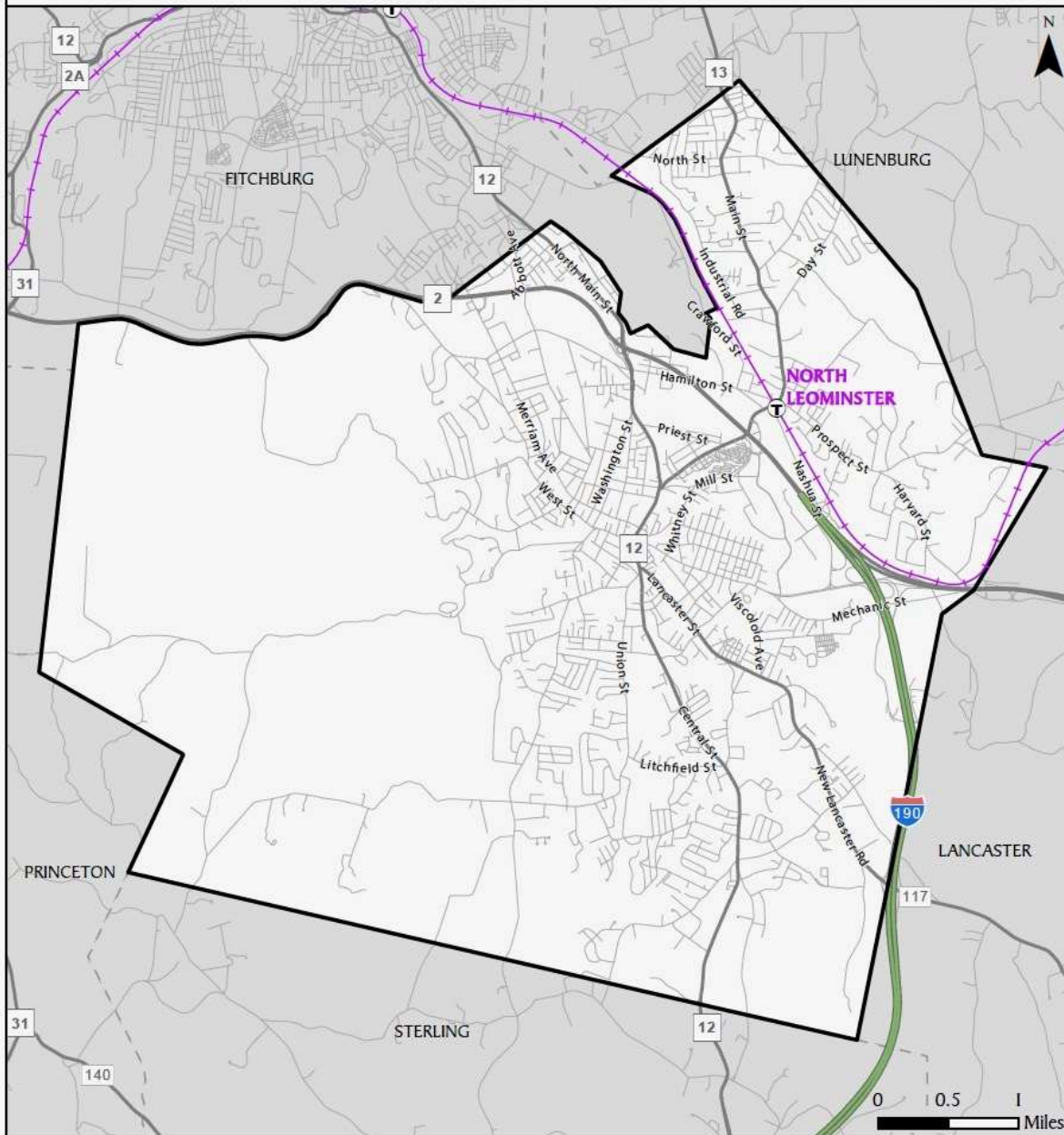
Information for the Consolidated Plan is from a Citizen Participation Plan (CPP) that includes outreach to ensure those who lack access to information and face barriers can participate. In the spring of 2021, the City gathered information from providers, staff, the public, the LMI community, and others as part of the CPP. The City was mindful of conducting this process with existing/past planning efforts to determine the most pressing LMI needs

# City of Leominster Consolidated Plan

- |                                    |                      |
|------------------------------------|----------------------|
| <b>MBTA Commuter Rail Stations</b> | <b>MassDOT Roads</b> |
| ⬇ Regular Service                  | — Interstates        |
| <b>MBTA Commuter Rail Lines</b>    | — State Routes       |
| — Regular Service                  | — Non-numbered Roads |



Source: City of Leominster, MassGIS,  
MassDOT, US Census Bureau ACS  
2015-2019, and HUD CHAS 2013-2017





## **Leominster Map**

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

HUD's Outcome Performance Measurement System for Community Planning and Development (CPD) Formula Grants is how a grantee determines how well programs/activities meet needs and goals. There are four actions grantees and their partners must take when following the CPD Outcome Performance Measurement System:

- Determine the intent of their activities;
- Select objectives and outcomes;
- Record objectives and outcomes in IDIS; and
- Report on indicators in IDIS.

The system outlines the following objectives: Providing Decent Housing, Creating Suitable Living Environments, and Creating Economic Opportunities. The objectives capture impacts as a result of activities. Outcomes refine objectives and capture the change/results a grantee seeks. HUD created 3 outcomes: Affordability, Availability/Accessibility, and Sustainability.

Once the grantee establishes the purpose (objective) and intended result (outcome), they identify how to measure progress via indicators. There are common indicators - reported for all program activities - or activity-specific indicators. Indicators measure progress throughout the Plan. Common indicators include: funds leveraged; the number of persons assisted; income and race/ethnicity/disability data reporting. The Strategic Plan and the AAP outline Goal Outcome Indicators. The Consortium's objectives include public services, facility upgrades, economic development, administration, demolition/clearance, rehabilitation, and redevelopment. The CPP, Needs Assessment, and Market Analysis resulted in the following needs as outlined in the Strategic Plan:

- Streetscape, sidewalk, park, and infrastructure/facility improvements;
- Mental health, substance abuse/addiction, crime prevention/awareness, and youth/childcare services;
- Street beautification, lighting, signage, traffic calming, and other Downtown improvements;
- Housing rehabilitation, code enforcement, and energy efficiency upgrades;
- Transitional housing, homelessness services, and support to address homelessness; and
- More housing with supportive services and availability of services for domestic violence victims, the elderly, and the disabled.

### **3. Evaluation of past performance**

The City has overseen many activities since its involvement in the CDBG program. Programming has proven to be timely and successful in meeting national objectives and outcomes, investing the necessary resources to meet priority needs, and achieving goals. Despite the successful implementation of prior Consolidated Plans and AAPs, the City continues to face discrepancies among available funding and the cost of meeting needs, particularly concerning facility and infrastructure upgrades. As a result, the City leverages additional funding from other sources to match CDBG. Previously, the City's goals have been to increase affordable housing, provide economic opportunities, and eliminate homelessness. Today, those needs remain top priorities for the LMI population. The City maintains communication with HUD, its subrecipients, the City of Fitchburg, and the public to optimize all the program offers. A disbursement summary from the City's most recent Summary of Accomplishments Report (PR-23) is in the Appendix.

[See Appendix for Figure ES-05.1]

#### **4. Summary of citizen participation process and consultation process**

The 2022-2026 Consolidated Plan and 2022 AAP Citizen Participation Process involved multiple forms of outreach. The Plan's consultant hosted a hearing on the draft and a hearing on the final plan before submission into Integrated Disbursement and Information System (IDIS). Leominster staff circulated an online Community Needs Survey, with paper versions available upon request. There were separate surveys for social service agencies and shelter providers. Consultants hosted two all-day focus groups in March 2021 to gather targeted expertise. The consultants also provided flyers and templates for web pages, social media, and ongoing staff consultations. The draft Consolidated Plan and AAP were available for a 30-day public comment period before final submission. Planning efforts and outreach conducted prior to this Consolidated Plan update complemented the CPP. For example, information from the Comb & Carriage/ French Hill Gateway Plus Action Plan and the Monoosnoc Brook Greenway Action Plan informed sections of this Plan. Ongoing initiatives that informed this plan include the Gateway Cities Economic Development Incentive Program, North Central Massachusetts Development Corporation, and the Montachusett Regional Planning Agency. An ongoing outreach process is critical, as it offers multiple chances to provide input. A broad process confirms investment in what citizens need and that the goals/priorities are relevant. Future reporting, such as CAPER's, AAP's, and any substantial amendments, rely on the Consolidated Plan's CPP. Please note that AAP amendments must be made public and are subject to another CPP process. Further information on Citizen Participation for this Consolidated Plan is in section PR-15.

#### **5. Summary of public comments**

A summary of public comments is in PR-15, Table 4 of the Citizen Participation Plan. Minutes of all meetings/public hearings pertaining to this plan are in the Appendix.

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

The City accepted all comments.

## **7. Summary**

The City of Leominster commissioned a thorough CPP for the 2022-2026 Consolidated Plan update. The ACS, Census, CHAS, the CPP, and related datasets informed the Needs Assessment and Market Analysis. Both sections underscore community needs through a detailed demographic, economic, and community-based assessment. The Strategic Plan outlines how the City will address needs through established goals and the institutional delivery structure. Lastly, the AAP details these efforts per program year throughout the consolidated planning period (one AAP for each year through 2026). The Citizen Participation process, the information provided by the Office of Community Development and Housing, and feedback from the Consolidated Plan Advisory Committee created the following priorities, reiterated in sections SP-05, SP-25, and the PY48 AP-20. The priorities listed are done so with the understanding that the ability to meet them is affected by the decreasing HOME and CDBG funds allocated to the City.

### **Additional Summary Text**

CDBG Priorities:

- Assistance for Youth. The City commits CDBG funds to youth services, particularly afterschool programs and childcare activities. Although there is a 15 percent cap on the amount allocated to public services per year, the City recognizes the need for community service programs that address the root causes of poverty and homelessness. The City will offer programs with an array of positive outcomes to "stretch" the available dollars and prioritize programs for elementary-aged students, middle-school students, and teens that complement successful existing activities, such as the Boys and Girls Club.
- Economic Development. The City will prioritize economic development that invests in human intellectual capital, growing the workforce's skillsets while creating jobs. Based on the data, this was seen as an ongoing need across the region. The CDBG program will leverage funds to reach as many eligible businesses as possible; technical assistance and loans are the best way to do so. Investment in technical assistance will help business owners develop viable business plans and secure funding to revitalize their storefronts, improve commercial districts, and grow the tax base to sustain those efforts. CDBG funds are available to eligible applicants who wish to pursue façade upgrades and improvements.

- Public Infrastructure and Facilities. The public and local professionals cited transportation expansion and improvement as a priority for this Consolidated Plan. Transportation infrastructure such as streets and sidewalks will meet the need for greater walkability and Downtown accessibility. The City will prioritize street beautification, street lighting, parks, recreation facilities, and open space improvements over the next five years.
- PY48 CDBG Priorities. The City understands that overcoming the hardships of the COVID- 19 pandemic poses ongoing economic challenges throughout PY48. Eligible CDBG activities such as business assistance will have a higher priority in the first year of this Consolidated Plan. At this time, businesses are remaining stable and navigating the recovery phase. The

City will assist those applicants in need as much as possible during this time. The City is confident it will maintain its past performance record while exploring new opportunities for the CDBG program. This includes monitoring subrecipients, reporting quarterly accomplishment data and financial reporting, and tracking invoices. The City will collect the necessary documentation from subrecipients and enter that into HUD's eCon Planning Suite via the Integrated Disbursement and Information System (IDIS). Data in IDIS is measured against the Consolidated Plan goals in place when the City sets up an activity. During the activity's initial setup, the City confirms the applicant's ability to meet performance benchmarks and their proposed outcomes/impact for funding. The CDBG application process verifies this information.

## The Process

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

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

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

Agency Role	Name	Department/Agency
Lead Agency	LEOMINSTER	
CDBG Administrator	LEOMINSTER	CDBG Program
HOME Administrator	LEOMINSTER	

**Table 60– Responsible Agencies**

### Narrative

The Five-Year Consolidated Plan describes how the City of Leominster will use its CDBG funding over the next five years. The funds are received annually between 2022 and 2026, contingent upon submitting an Annual Action Plan (AAP) for each Program Year (PY). The 2022-2026 Consolidated Plan will include the PY2022 AAP, also known as Program Year 48, outlining how the City will use its CDBG allocation of approximately \$444,829. Figure PR-05.1 outlines Leominster's CDBG awards over the past ten years.

The Office of Community Development and Housing is responsible for administering the CDBG program and its portion of the HOME program. The City oversees the AAP submissions, eligible programs, and activities and confirms subrecipients will further community development goals citywide. The Department contains planning and development, CDBG, economic development, business development, and housing rehabilitation. The setup streamlines grant administration and compliance, as each division oversees initiatives across the City that leverage CDBG and HOME funding. The development of this Consolidated Plan occurred under the supervision of the Office of Community Development and Housing, with assistance from Barrett Planning Group LLC.

Coordination with the Office of Community Development and Housing for this effort was supplemented by coordination with other staff, including the Mayor's Office, the Health Department, City Council, and the Department of Public Works. Consultants also worked with nonprofit agencies, housing and service providers, private entities, and the general public throughout this process.

[See Appendix for Figure PR-05.1]

### **Consolidated Plan Public Contact Information**

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Website: <https://www.leominster-ma.gov/depts/management/planning/default.asp>

## **PR-10 Consultation - 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)**

### **1. Introduction**

The Office of Community Development and Housing and Barrett Planning Group conducted outreach as part of the Citizen Participation Process for this Plan. The consultation process involved several public meetings, two Community Needs Surveys, a social service agency survey, a shelter survey, and focus group discussions with local/regional community development and housing professionals.

The process began in February 2021 when the Department asked other staff, nonprofits, business interests, and relevant stakeholders to participate in focus group sessions. The focus groups, surveys, and public hearings garnered responses from the general public, municipal staff, board/commission members, and advocates for homeless and non-homeless special needs populations throughout the spring. The Appendix includes an outline of survey results and a copy of the focus group questionnaire.<sup>4</sup> Outreach also involved phone conversations and virtual meetings with the Plan's consultants focusing on coordination, scheduling, and logistics such as legal advertisements, translation services, and data-sharing. Two advertised public hearings on the draft plan and the final plan completed the Consultation process. The process provided critical information for the Needs Assessment, Market Analysis, and Strategic Plan.

Throughout the Plan's development, the consultants solicited written and verbal comments on community development and housing needs from LMI and target-area neighborhood organizations, as well as organizations representing minorities, the ESL population, the disabled, the elderly, and other underrepresented groups. The Office of Community Development and Housing t posted advertisements in the local print media for all outreach efforts pertaining to this Plan. Information was also posted on the City's webpage and social media sites. Lastly, information was emailed to specific staff and providers and community development/housing list serves. The draft Plan on the city's web page throughout the 30-day comment period.

**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)).**

Leominster utilizes various methods to enhance coordination between providers and health, mental health, and service agencies. The City will:

- Host annual meetings during the development of the AAP, consisting of information-sharing, gathering input on needs, and learning about programs;

- Visit providers for monitoring, assessing if programs are expending CDBG funds promptly and following requirements; and
- Serve as the clearinghouse and contact for information, assistance, and materials.

Both cities have persistent needs verified in the CPP surveys and focus groups. Agencies reported affordable housing and access to services remain top needs among LMI and ESL populations. The City works with providers and other parties on community development. Leominster's Spanish American Center has a Family Advocate Information and Referral Specialist that handles referrals, advocacy, and case management for housing, health, education, employment, immigration, etc. (verbal and written). They partner with organizations to bridge service gaps, including Central MA Area on Aging and the Greater Worcester Community Foundation.

The Community Health Network of North Central Massachusetts (CHNA 9) is an initiative to improve health through local collaboration. CHNA 9 is a partnership between DPH, the Central MA Center for Healthy Communities, hospitals, service agencies, etc. to: identify and address the health needs of communities, and improve the scope of services. They are a repository for mental and behavioral health resources, including substance use, COVID-19, and teenage anxiety and depression solutions. Several other Leominster-based organizations have been long-standing partners and are funded by CDBG.

Leominster works with public housing providers, service agencies, and private providers to improve quality of life. Nonprofits and agencies coordinate on resources and expanding programming. CDBG staff and the Housing Rehab Coordinator participate in partner meetings, provide technical assistance, coordinate information events, and circulate notifications. The Department stays updated on municipal resources for LMI residents in need. Staff educate leadership about needs, advocate for policy changes, and encourage changes that enhance the community at large. They work with boards, constituents, the Mayor, and City Council to connect their work. Many affordable housing projects are nonprofit owned and operated with case management staff to assist with mental health and other services. They are well connected within the community and are often members of local committees and joint task forces, associations, etc.

**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**

CDBG addresses the needs of the homeless locally and regionally, working with the Worcester CoC. CDBG staff attend meetings and obtain data for PIT Counts. CDBG supports North Star Family Services Inc. and the Montachusett Home Care Corporation that work with the homeless. As part of the HOME Con Plan's Needs Assessment, the City reached out to homeless providers, shelters, and places of worship. Fitchburg and Leominster are in the CoC service area - MA-506. They work with DHCD, HUD,



and local entities to end homelessness. The Central Massachusetts Housing Alliance (CMHA) is the lead CoC organization. Each CoC employs their own processes to address housing and supportive services. CMHA coordinates services in the CoC framework, improving delivery and distribution. City staff and partners coordinate timely services to those transitioning into more stable living. CMHA coordinates with organizations on needs assessments and program development. The cities do not receive federal funds for homeless prevention. The CoC follows HUD eligibility requirements; it has a Coordinated Entry System (CES) accessible by speaking with shelters, online, or by calling CMHA. The CES measures vulnerabilities based on indicators and barriers. The standard assessment tool covers the entire CoC, reaching those least likely to apply for assistance and prioritizing those most in need.

Using the Homeless Management Information System (HMIS), member communities collect numbers for the PIT count - an annual count of people experiencing homelessness who are in shelter, transitional housing, and safe haven. Data identifies gaps in services and housing. Providers responsible for the PIT in Fitchburg and Leominster receive state/federal funding.

Massachusetts mandates policies for the discharge of youth aging out of foster care, patients exiting health and mental care facilities, and offenders exiting the corrections system. The Department of Children and Families, Department of Public Health, etc. collaborate on the discharge process. The CoCs share discharge information and updates. It is the CoC's responsibility to ensure those discharged are not being discharged into a homeless situation by coordinating with systems of care.

Public services, housing authorities, and city officials communicate with the CMHA and attend CoC meetings held at CMHA's offices in Worcester, MA. These meetings coordinate efforts to address homeless needs and those at risk. The Leominster Housing Authority provides a preference for the homeless per state regulations. An individual/family is given an Emergency Application, and if approved, moves to the front of the waiting list.

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

Leominster does not currently receive Emergency Shelter Grant (ESG) funds and does not administer a Homeless Management Information System (HMIS). As a result, it does not consult with the Worcester CoC on the allocation of ESG funds or the administration of HMIS.

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

**Table 61– Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	YWCA - Battered Women's Resources
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Victims of Domestic Violence Services-homeless Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Strategic Plan
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into the annual planning/allocation process. Community Development staff consulted with the YWCA in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department also consulted with YWCA via a survey and various public hearings.
2	<b>Agency/Group/Organization</b>	Southern Middlesex Opportunity Council (SMOC)
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Service-Fair Housing Economic Development
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Market Analysis Strategic Plan
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Requested data for people served in programs. Input to be incorporated into the annual planning/allocation process.

3	<b>Agency/Group/Organization</b>	Fitchburg Veterans Services Office
	<b>Agency/Group/Organization Type</b>	Services - Narrowing the Digital Divide Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homelessness Needs - Veterans Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Requested data for people served in programs. Input to be incorporated into annual planning/allocation process. Staff also responded to questions regarding narrowing the digital divide and broadband access as part of focus group discussions.
4	<b>Agency/Group/Organization</b>	Fitchburg City Departments
	<b>Agency/Group/Organization Type</b>	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Other government - Local Hazard Mitigation
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis Strategic Plan

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	<p>Ongoing discussions and consultation with City staff and departments throughout the Consolidated Planning process. Coordination on outreach, advertising, data sharing, and finalization of the plan. Informed each aspect of the Con Plan and the AAP. The Police Chief, Board of Health Director and Health Department, Veterans' Services, Treasurer, Mayors Office, Economic Development Director, Building Commissioner, Community Development Director, Assistant City Solicitor, Director of Recreation, and the Director of Public Works responded to questions regarding hazard mitigation, management of flood prone areas, public land or water resources, emergency management, and narrowing the digital divide as part of focus group discussions. The Economic Development Director discussed recent strides taken to improve internet access for LMI residents and business owners, and how the City is improving digital literacy. Consultants also used data published by the Open Space and Hazard Mitigation to inform the Hazard Mitigation section of the Con Plan and for detailed information regarding the management of flood prone areas, public land or water resources and emergency management agencies.</p>
5	<b>Agency/Group/Organization</b>	Leominster City Departments
	<b>Agency/Group/Organization Type</b>	<p>Services - Broadband Internet Service Providers</p> <p>Services - Narrowing the Digital Divide</p> <p>Other government - Local</p> <p>Hazard Mitigation</p>
	<b>What section of the Plan was addressed by Consultation?</b>	<p>Housing Need Assessment</p> <p>Homelessness Strategy</p> <p>Non-Homeless Special Needs</p> <p>Market Analysis</p> <p>Strategic Plan</p>

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Ongoing discussions and consultation with City staff and departments throughout the Consolidated Planning process. Coordination on outreach, advertising, data-sharing, and finalization of the plan. Informed each aspect of the Con Plan and the AAP. City staff including the Economic Development Director, the DPS's Senior Engineering Aide, and the Small Business Development Coordinator responded to questions regarding hazard mitigation, management of flood prone areas, public land or water resources, emergency management, and narrowing the digital divide as part of focus group discussions. Consultants also used data published by the Open Space and Hazard Mitigation to inform the Hazard Mitigation section of the Con Plan and for detailed information regarding the management of flood prone areas, public land or water resources and emergency management agencies.
6	<b>Agency/Group/Organization</b>	Community Health Connections
	<b>Agency/Group/Organization Type</b>	Services-homeless Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Requested data for people served in programs. Input to be incorporated into the annual planning/allocation process.
7	<b>Agency/Group/Organization</b>	LUK Crisis Center
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-homeless Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into the annual planning/allocation process. Community Development staff consulted with LUK in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department consulted with LUK via a survey and various public hearings.
8	<b>Agency/Group/Organization</b>	Community Needs Assessment Survey Fitchburg and Leominster
	<b>Agency/Group/Organization Type</b>	Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non Housing Community Development
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The community needs survey was sent via email and posted on web pages in both cities. Mailer surveys were available upon request. The Fitchburg survey was translated into Spanish. Specific surveys were sent to service providers and shelters. Input to be incorporated into the annual planning/allocation process.
9	<b>Agency/Group/Organization</b>	Department of Mental Health
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Elderly Persons Services-Persons with Disabilities Other government - State
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Requested data for people served in the Consortium. Input to be incorporated into the annual planning/allocation process.

10	<b>Agency/Group/Organization</b>	Massachusetts Department of Developmental Services
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Requested data for people served in the Consortium. Input to be incorporated into the annual planning/allocation process.
11	<b>Agency/Group/Organization</b>	MA Commission for the Blind
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Requested data for people served in the Consortium. Input to be incorporated into the annual planning/allocation process.
12	<b>Agency/Group/Organization</b>	Jeffrey's House
	<b>Agency/Group/Organization Type</b>	Services - Housing Substance Abuse
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Market Analysis Strategic Plan
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Requested data for people served in programs. Input to be incorporated into the annual planning/allocation process

13	<b>Agency/Group/Organization</b>	Our Father's House, Inc.
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-homeless Services-Education Employment to homeless adults and families
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into the annual planning/allocation process. Community Development staff consulted with Our Father's House in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department consulted with Our Father's House via a survey and various public hearings.
14	<b>Agency/Group/Organization</b>	Massachusetts Department of Public Health
	<b>Agency/Group/Organization Type</b>	Services-Health Other government - State
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Data was collected from state webpages on alcohol and drug addiction, AIDS, and related diseases. Input to be incorporated into the annual planning/allocation process.
15	<b>Agency/Group/Organization</b>	My Turn, Inc.
	<b>Agency/Group/Organization Type</b>	Services-Children Business Leaders Economic Development
	<b>What section of the Plan was addressed by Consultation?</b>	Market Analysis Non-Housing Community Development



	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Requested data for people served in the Consortium. Input to be incorporated into the annual planning/allocation process.
16	<b>Agency/Group/Organization</b>	WORK, Inc.
	<b>Agency/Group/Organization Type</b>	Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Requested data for people served in programs. Input to be incorporated into the annual planning/allocation process.
17	<b>Agency/Group/Organization</b>	VETERANS HOSPICE HOMESTEAD
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Elderly Persons Services-homeless Services-Health Veterans
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Requested data for people served in programs. Input to be incorporated into the annual planning/allocation process.
18	<b>Agency/Group/Organization</b>	LEOMINSTER HOUSING AUTHORITY
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs Market Analysis

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into the annual planning/allocation process. Community Development staff consulted with LHA in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department consulted with LHA via a survey and various public hearings.
19	<b>Agency/Group/Organization</b>	Fitchburg Housing Authority
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into the annual planning/allocation process. Community Development staff consulted with LHA in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department consulted with LHA via a survey and various public hearings.
20	<b>Agency/Group/Organization</b>	North Star Family Services, Inc.
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-homeless Services - Narrowing the Digital Divide Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Homeless Needs - Families with children Market Analysis Anti-poverty Strategy

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into annual planning/allocation process. Community Development staff consulted with NSFS in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department also consulted with NSFS via a survey and various public hearings. Staff also responded to questions regarding narrowing the digital divide and broadband access as part of focus group discussions.
21	<b>Agency/Group/Organization</b>	Joint Coalition on Health of North Central Mass.
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Report obtained on Community Health Needs Assessment in North Central Mass. Input to be incorporated into the annual planning/allocation process.
22	<b>Agency/Group/Organization</b>	Catholic Charities
	<b>Agency/Group/Organization Type</b>	Services-homeless Services - Narrowing the Digital Divide Other government - Federal Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis Anti-poverty Strategy

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into annual planning/allocation process. Community Development staff consulted with CCWC in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department also consulted with CCWC via a survey and various public hearings. Staff also responded to questions regarding narrowing the digital divide and broadband access as part of focus group discussions.
23	<b>Agency/Group/Organization</b>	Growing Places
	<b>Agency/Group/Organization Type</b>	Services-Health Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into the annual planning/allocation process. Community Development staff consulted with Growing Places in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department consulted with Growing Places via a survey and various public hearings.
24	<b>Agency/Group/Organization</b>	Habitat for Humanity North Central Massachusetts
	<b>Agency/Group/Organization Type</b>	Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into the annual planning/allocation process. Community Development staff consulted with NCMHH in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department consulted with NCMHH via a survey and various public hearings.
25	<b>Agency/Group/Organization</b>	United Way of North Central MA
	<b>Agency/Group/Organization Type</b>	Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into the annual planning/allocation process. Community Development staff consulted with UWNCM in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department consulted with UWNCM via a survey and various public hearings.
26	<b>Agency/Group/Organization</b>	Consolidated Plan Advisory Committee
	<b>Agency/Group/Organization Type</b>	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Business and Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Market Analysis Anti-poverty Strategy

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The cities of Fitchburg and Leominster consulted the Committee via focus groups, surveys, and in public meetings. The Committee contained professionals in housing, social services, economic development, infrastructure, services and facilities. The information exchanged confirmed the need for the CDBG and HOME programs and validated the program's priorities. The group offered suggestions for improvement and discussed pressing issues regarding internet/broadband access and economic development, as well as green initiatives, sustainability, and resilience.
27	<b>Agency/Group/Organization</b>	NewVue Communities, Inc.
	<b>Agency/Group/Organization Type</b>	Services - Housing Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Strategic Plan
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into the annual planning/allocation process. Community Development staff consulted with NewVue in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department consulted with NewVue via a survey and various public hearings.
28	<b>Agency/Group/Organization</b>	Spanish American Center
	<b>Agency/Group/Organization Type</b>	Services-Victims of Domestic Violence Services-Education Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Strategic Plan

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into the annual planning/allocation process. Community Development staff consulted with SAC in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department consulted with SAC via a survey and various public hearings.
29	<b>Agency/Group/Organization</b>	Making Opportunity Count
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Strategic Plan
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into the annual planning/allocation process. Community Development staff consulted with MOC in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department consulted with MOC via a survey and various public hearings.
30	<b>Agency/Group/Organization</b>	The Arc of Opportunity
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Persons with Disabilities Services-Health Regional organization

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Strategic Plan
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into the annual planning/allocation process. Community Development staff consulted with Arc in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department consulted with Arc via a survey and various public hearings.
31	<b>Agency/Group/Organization</b>	CENTRO LAS AMERICAS
	<b>Agency/Group/Organization Type</b>	Services-Health Services-Education Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Regional organization Economic Development
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Economic Development Market Analysis Strategic Plan
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into annual planning/allocation process. Community Development staff consulted with CENTRO in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department also consulted with CENTRO via a survey and various public hearings. Staff also responded to questions regarding narrowing the digital divide and broadband access as part of focus group discussions.



32	<b>Agency/Group/Organization</b>	Fitchburg Redevelopment Authority
	<b>Agency/Group/Organization Type</b>	Regional organization Business and Civic Leaders Economic Development
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Strategic Plan
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into the annual planning/allocation process. Community Development staff consulted with FRA in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department consulted with FRA via a survey and various public hearings.
33	<b>Agency/Group/Organization</b>	Fitchburg Public Schools
	<b>Agency/Group/Organization Type</b>	Services-Education Schools
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Homeless Needs - Families with children Non-Homeless Special Needs Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into the annual planning/allocation process. Community Development staff consulted with FPS in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department consulted with FPS via a survey and various public hearings.

34	<b>Agency/Group/Organization</b>	Fitchburg State University
	<b>Agency/Group/Organization Type</b>	Services-Education Services - Narrowing the Digital Divide State University Major Employer
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Economic Development Market Analysis Strategic Plan
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into annual planning/allocation process. Community Development staff consulted with FSU in a focus group. The meeting discussed barriers, needs, and goals. Attendees made recommendations to improve issues associated with service provision. The Community Development Department also consulted with FSU via a survey and various public hearings. A representative from Fitchburg State University sat on the Advisory Committee and discussed the importance of internet access, narrowing the digital divide, and their correction with economic development and supporting low and moderate-income households. This representative also discussed Fitchburg State Idealab and how it is bridging the digital divide for student, faculty and the greater community.
35	<b>Agency/Group/Organization</b>	North Central MA Chamber of Commerce
	<b>Agency/Group/Organization Type</b>	Services-Employment Services - Narrowing the Digital Divide Business and Civic Leaders Chamber of Commerce
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Economic Development Market Analysis

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into annual planning/allocation process. Community Development staff consulted with the Chamber via a survey and various public hearings. A representative from the Chamber sat on the Advisory Committee and discussed the importance of internet access, narrowing the digital divide, and their correction with economic development and supporting low and moderate-income business owners. This representative also discussed technology and language barriers, and recommendations to overcome common challenges in both communities.
36	<b>Agency/Group/Organization</b>	Montachusett Regional Planning Commission
	<b>Agency/Group/Organization Type</b>	Housing Planning organization Hazard Mitigation
	<b>What section of the Plan was addressed by Consultation?</b>	Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into annual planning/allocation process. Staff also used data published by the Commission to inform the Hazard Mitigation section of the Con Plan and for detailed information regarding the management of flood prone areas, public land or water resources and emergency management agencies.
37	<b>Agency/Group/Organization</b>	North Central MA Workforce Investment Board/MassHire
	<b>Agency/Group/Organization Type</b>	Services-Employment Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Other government - State
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development Market Analysis

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Electronic request for information to be included in the Con Plan. Input to be incorporated into annual planning/allocation process. Staff also used data published by the Board to inform the Broadband section of the Con Plan and for detailed information regarding internet service providers and/or organizations engaged in narrowing the digital divide.
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### Identify any Agency Types not consulted and provide rationale for not consulting

The City did not exclude any agencies interested in the Five-Year Consolidated Plan during the consultation process.

### 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	Worcester City & County Continuum of Care Central Massachusetts, DHCD	Goal to end homelessness through the provision of shelter and housing opportunities.
Rail Trail	Twin City Rail Trail Association	Complements the Consolidated Plan by creating and providing access to recreational opportunities.
Fitchburg State University's Strategic Plan	Fitchburg State University	Complements the Consolidated Plan by combining efforts on the part of the City and the University to grow the local economy and the quality of life for the FSU student body and the community at large.
Consortium 5 Year Consolidated Plan & PY42 AAP	Fitchburg-Leominster Consortium	Goals for housing/homelessness needs, non-housing needs, and non-housing community development needs. Point of reference to understand changes in the provision of services and programs. The plan also contains data to use for understanding trends.
Mass Growth Capital Corporation Initiative	City of Leominster	The City's state program forwards several economic development, public facilities, and infrastructure goals shared within the Strategic Plan.

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Comb & Carriage/French Hill Gateway Action Plan	City of Leominster	It informed data-driven recommendations for Comb & Carriage/French Hill target area. Assess problems and offered solutions that overlap with Consolidated Planning efforts and goals.
Leominster Guide to Growing Greener	City of Leominster	A study of comprehensive ways to advance greener growth and cleaner water in the City. The study combines natural, recreational, cultural, and community resources to achieve sustainability and conservation goals. Goals align with housing and non-housing community development needs.
Gateway Cities Economic Development Incentive Program	City of Leominster	The City's state program forwards economic development goals shared in the Strategic Plan, based on needs in the Consolidated Plan's findings.
Leominster Housing Development Incentive Program	City of Leominster	The City's state program forwards housing goals shared in the Strategic Plan, based on needs in the Consolidated Plan's findings.
2014-2021 Open Space & Recreation Plan	City of Leominster	Identification of active and passive recreation and open space improvements, which overlap with health services, public safety, and non-housing community development needs.

**Table 62– Other local / regional / federal planning efforts**

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

Fitchburg and Leominster work together on housing investments and strategies concerning the HOME program as Consortium members. Both cities are members of the Central Massachusetts Housing Alliance, which includes financial institutions, nonprofit agencies, and local government partners working together on community development and housing. Members work with various credit and banking institutions on affordable housing for LMI residents.

Leominster works with several local, regional, and state organizations to implement the Consolidated Plan. The CDBG program works with Fitchburg's HOME program staff to provide affordable housing for residents in the two cities. The City works with state agencies like the Office of Housing and Economic

Development and the Executive Office of Environmental Affairs to improve sidewalks and recreational facilities that benefit LMI populations. During the RFP process, the City considers projects that leverage multiple funding sources and serve high priority needs. From 2022 to 2026, Leominster anticipates receiving additional federal, state, and local resources to leverage CDBG efforts.

### **Narrative**

Consolidated Plans require the cooperation and participation of various organizations to properly determine needs and opportunities for CDBG funding. This Consolidated Plan effort attempted to include as many community entities as possible to achieve this goal. The process involves linking past, present, and future planning efforts. Commissioned studies containing evaluations of housing, economic development, and other related assessments informed the Needs Assessment and Market Analysis of this Plan. These plans are in Table 3.

The City of Leominster works collaboratively to seek out local and state match opportunities, as the current funding allocations are not enough to cover the cost of larger projects/activities. As an Entitlement Grantee, Leominster must adhere to specific performance measures and timely expenditure of funds established by HUD. The roles and responsibilities of partners must be clear, or beneficiaries can be adversely affected. If not properly managed, backlogs can have compounding effects, diverting attention from other projects. Because of this, the City maintains a strong, transparent, and ongoing relationship with partners to revitalize the City for its low and moderate-income residents.





## **PR-15 Citizen Participation - 91.105, 91.115, 91.200(c) and 91.300(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

The CPP was updated for the Consolidated Plan. Outreach consisted of 4 focus group sessions (March 3-March 4, 2021), an online Community Needs Survey (March 9-March 24, 2021), an online agency survey, an online shelter survey (both during the same time as the Community Needs Survey), and a 30-day comment period. Written copies of the survey were available upon request until April 2, 2021. There were 9 paper responses to the Community Survey. The City created and circulated flyers and social media posts. The public hearing was hosted via Zoom and summarized the plan and gathering more feedback. Newspaper ads provided advanced notice of public hearings. All notices were posted on the City website. Table 4 summarizes comments provided at meetings and during the comment period. Information from the consultations is also in PR-10. Outreach was conducted in a manner consistent with the approved CPP. The City solicited written/verbal comments from LMI neighborhoods, minority organizations, elected officials, program year applicants, and the public.

CDBG staff administered the Community Needs Survey for feedback on housing, social service, public facilities/infrastructure, economic development, and age-based priorities. The survey required rating needs, answering demographic questions, and questions about housing discrimination. Respondents could complete the survey online via link or on their mobile devices via a QR code. There were 26 responses to the Community Needs Survey, 2 responses to the shelter survey, and 18 to the agency survey. Responses yielded an adequate dataset to inform the Plan. Focus groups discussed needs/issues, priorities, what partners are doing, and recommendations. Roughly 15 agencies, providers, and departments attended six focus groups. One individual submitted responses electronically.

The comment period was open until April 2022. The City posted a link to the Plan on the website, and hard copies were available. The City encouraged participation of minorities, ESL populations, and people with disabilities. The City provides translation services and can have translators available. Information regarding translations services/notices in other languages is available on their website.

### 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)
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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	Focus Groups	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p>	<p>Six focus group sessions were held consecutively between March 3 and March 4, 2021, via Zoom. The meetings were on the following topics in respective order: housing (9 total attendees), social services (11 attendees), economic development (9 attendees), facilities and services (4 attendees), health services (2 attendees), and City staff (12 attendees). The Consolidated Plan consultant, Barrett Planning Group, conducted the meetings. They explained the Plan and asked attendees about specific needs, priorities, and</p>	<p>Attendees provided comments and answered questions about the following: economic development, public facilities/public infrastructure, public services, health services, and housing. Participants made suggestions for improvements, discussed achievements/milestones in their fields described specific trends, highlighted challenges, and addressed priorities for LMI residents. There was one response to the facilities/services</p>	<p>All comments accepted.</p>	<p><a href="https://www.signupgenius.com/">https://www.signupgenius.com/</a></p>

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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)
2	Focus Groups	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>Twenty-six people completed a Needs Assessment online survey between March 9 and March 24, 2021. The survey link and QR code were circulated for widespread distribution by the Community Development Department. Hard copies of the survey were available upon request, of which there were nine submissions. Two shelters completed the shelter survey, and eighteen agencies completed the agency/provider survey. Those two surveys were also open from March 9 to March 24, and the link and QR code were circulated to the Community</p>	<p>Priority needs indicated in housing availability and affordability, mental health and youth services, substance abuse services, facility/park upgrade, public infrastructure and streetscapes, and economic development assistance. Participants were also asked basic demographic questions. The survey was anonymous.</p>	All comments accepted.	<a href="https://www.surveymonkey.com/">https://www.surveymonkey.com/</a>

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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)
3	Newspaper Ad	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	This publication has a wide circulation. The 30-day notice for public comment of the draft Consolidated Plan was posted in Spring 2022.	No comments received.	All comments accepted.	N/A

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Public Hearing	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>Members of the public attended the public hearing on the 2022-2026 Consolidated Plan and Program Year 48 AAP. Community Development staff were in attendance. The meeting was held virtually in Spring 2022 via Zoom. Meeting hosts explained the Plan and asked attendees about specific topics. The hearing addressed questions about the program.</p>	<p>Attendees provided comments and answered general questions about the following topics: housing, economic development, social services, and public facilities. Participants made suggestions for improvements and additions to be made.</p>	<p>All comments accepted.</p>	<p>N/A</p>

**Table 63– Citizen Participation Outreach**

## **Needs Assessment**

### **NA-05 Overview**

#### **Needs Assessment Overview**

This portion of the Consolidated Plan contains an assessment of non-housing community development needs for Leominster. For a compiled summary of needs related to housing, public housing, the homeless, and non-homeless special needs population in the Consortium, please see section NA-05 in the Fitchburg-Leominster HOME Consortium 2022-2026 Consolidated Plan. The data presented herein was determined through analysis of public and private sources, interviews with organizations, residents, business leaders, and from documents from City staff. It covers a range of needs and ensures the City develops plans and priorities that allocate at least 70 percent of funds to activities that benefit LMI households - a requirement of CDBG Entitlement grantees. Leominster remains committed to identifying and addressing housing and community development needs, providing services, and improving the quality of life of those who need it most. The City administered a Community Needs Survey in March of 2021 as part of the 2022-2026 HOME Consolidated Plan's community engagement process. The Needs Assessment does not focus on housing in particular; to provide context on what priorities were discussed in the Consortium's Needs Assessment. Survey results are presented below. Respondents rated housing needs from one to ten, including financial homebuyer assistance, and foreclosure prevention. Code enforcement, energy efficiency, and housing rehabilitation/repair were the highest-ranking needs, respectively, with 88 percent of respondents considering it a "medium" to "high" need.

[See Appendix for Figure NA-05.1]





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

### **Describe the jurisdiction's need for Public Facilities:**

Community development is an essential component of quality of life. HUD delineates needs through the following categories: public facilities, public improvements, and public services. Entitlement grantees are evaluated on these topics to understand what must be met and the interconnectivity with housing and community development. CDBG funds are used to develop viable communities through decent housing, a suitable living environment, and the expansion of economic opportunities. This funding is for the improvement of low and moderate-income areas.

Public facilities are all publicly-owned facilities, traditionally provided by the government or owned by a nonprofit and operated as open to the public. Examples of public facilities include senior centers, community centers, and facilities for special needs populations such as convalescent homes and homeless shelters. Leominster is a post-industrial city with an aging infrastructure and facilities that require upgrades. Focus groups and a Community Needs Survey highlighted several areas that require improvements: park and recreation facilities, the Boys and Girls Club, the library, multi-modal transportation including the Twin Cities Rail Trail, and alternative energy projects. Investment in accessible recreation and facilities in LMI neighborhoods remains a priority, as Leominster's passive and active recreation resources are popular with residents.

The Downtown needs accessibility upgrades; however, costs can be prohibitive. Because of this, Leominster is using funding from Complete Streets to remediate these issues. According to public feedback, buildings in need of attention are homeless shelters, youth centers, and childcare centers. Youth centers are important as they allow young people to stay involved in productive activities. As stated throughout the Consortium's assessment, affordable housing for various household types, ages, and income levels is a pervasive need. Leominster needs transitional housing and sober living environments for recently-treated individuals; the City does not have an emergency shelter.

A summary of the results from the Community Needs survey is below. Public facilities continue to be important to Leominster despite the negative impacts of COVID-19; this was particularly true for the Boys and Girls Club. The pandemic, high cost of construction and demolition, and limited bandwidth are barriers to improving the city's facilities. City staff utilizes CDBG for capital upgrades to improve the community as much as possible. Past and present planning is also considered when submitting CDBG applications, such as the Capital Improvement Plan.

[See Appendix for Figure NA-50.2]

### **How were these needs determined?**

The Needs Assessment survey, public hearings, focus groups, and consultations with City staff were conducted as part of the non-housing community development section of this Consolidated Plan. Supplementary phone, email, and in-person discussions were also conducted as part of the Needs Assessment. Information during public outreach identified those populations/services/facilities most in need.

### **Describe the jurisdiction's need for Public Improvements:**

Public improvements include activities conducted on publicly owned and operated property, such as street improvements, sidewalks, drainage infrastructure, and signage around the City. Leominster's topography poses challenges to keeping up with street and sidewalk improvements. The infrastructure is also generally old. Staff recognizes it is important to address streets and sidewalks as a top priority to promote the local community's health, safety, and vitality. Street improvements also impact storm water and flooding, so investment in improvement has multiple benefits. Focus groups highlighted that flooding is a major problem, and the City is working to streamline the budget process to tackle the issue. Street and sidewalk improvements, street lighting, beautification efforts, water/sewer improvements, storm water management, and street signs/traffic signals were mentioned as "medium" to "high" needs for this Consolidated Plan. It was reported that some neighborhoods where developers built homes and left without constructing sidewalks or streetlights. Public transportation is also a need in both Leominster and the larger region; the City is somewhat geographically isolated. Expansion and improving transit infrastructure to increase the frequency/create a more robust system would benefit the local economy.

Much has been done in Leominster's Downtown, but survey results indicate that plantings, lighting, and street beautification should be prioritized. Traffic calming and safety measures were also mentioned during the CPP. Applying CDBG to these efforts would create a safe, livelier Downtown, enhancing its appeal to people and businesses. The removal of architectural barriers and accessibility improvements continue to be a priority for sidewalks and green spaces/pocket parks. The staff understands that water/sewer improvements in Downtown and across the City are vital for attracting businesses, precisely why the system is targeted for investment and preventative maintenance.

Figure NA-50.3 summarizes the survey results. Public improvements discussed during the Consolidated Planning process were also priorities in other planning efforts, particularly hazard mitigation and adaptation; resistant infrastructure for a growing City; and the capital improvements outlined in the Comb & Carriage/French Hill Gateway Plus Action Plan and the Monoosnoc Brook Greenway Action Plan.

[See Appendix for Figure NA-50.3]

### **How were these needs determined?**

A Needs Assessment survey, public hearings, focus groups, and regular consultations with City staff were conducted as part of the non-housing community development section of this Consolidated Plan. Supplementary phone, email, and in-person discussions were conducted for the Needs Assessment. Information during public outreach identified those populations/services/facilities most in need.

### **Describe the jurisdiction's need for Public Services:**

Public services include programs for special needs populations. Types of services range from childcare to legal, youth, and senior services, transportation, and substance abuse. As seen in the CPP, Leominster has ongoing needs including homelessness, crime prevention, housing counseling, and disability services. In the Consortium's Needs Assessment, housing with services is a challenge in the region due to a lack of competitive wages, housing, and transportation for staff. Other challenges include the limited funding available. HUD enacts a 15% cap on public service spending and requires a high level of reporting, straining nonprofit staff who are constantly applying for funding matches. As providers relayed, timely services are critical to prevent clients from entering a bad/worsening situation; lack of funding can exacerbate service gaps. This is particularly true for those with mental health issues, at-risk youth, those with substance abuse issues, and those at risk of homelessness.

A full range of homelessness services is needed in Leominster, from prevention to transition. Services include food and nutrition, case management, employment training, mental health counseling, emergency shelter, and transitional housing. Assisting the homeless and addressing underlying issues will also help law enforcement. Affordable housing equipped with on-site/nearby or visitation-based services is one solution the City will advocate for. Substance abuse and mental health services will be priorities, including increasing access to treatment and counseling.

Crime awareness/prevention are ongoing, particularly in Downtown and on Main and Mechanic Streets. The patrols were important during focus groups. The survey emphasized services that uphold security, privacy, and developing skills for DV victims. DV victims also need adequate housing as they transition from their prior situation. The survey underscored adult education and ESL courses. The Spanish American Center is one provider that offers courses and does great work in the City. Staff will allocate CDBG funding to programs supporting these efforts and:

- Workforce development;
- Meals on Wheels and addressing food security;
- Ginny's Helping Hand Food Bank and food pantries;
- Elder services/Senior Center programs;
- Services for the disabled;

- Childcare/youth services; and
- Mental and physical health services.

[See Appendix for Figure NA-50.4]

### **How were these needs determined?**

A Needs Assessment survey, public hearings, focus groups, and consultations with staff were conducted as part of the non-housing community development section of this Consolidated Plan. Supplementary phone, email, and in-person discussions were conducted for the Needs Assessment. Information during public outreach identified those populations/services/facilities most in need.

### **Based on the needs analysis above, describe the State's needs in Colonias**

# Housing Market Analysis

## MA-05 Overview

### Housing Market Analysis Overview:

Population, income, transportation, employment, and amenities influence housing in Leominster. The Consortium lags due to the Great Recession's impacts. However, Leominster is "open for business", utilizing TIF, Special Tax Assessment (STA), the Abandoned Building Renovation Tax Deduction (ABRTD), Gateway Community Status, the Housing Development Incentive Program (HDIP), and North Central MA Career Center/Workforce Investment Board.

The Market Analysis explains conditions with CPP data, previous planning, and proprietary sources. Understanding the housing supply, jobs, and demands helps the City decide how to use CDBG. The City is in a good position. The Regional Strategic Plan Framework states the City has the largest population and households will increase by 1,950 by 2035. The City received a Platinum bio-tech rating from the MA Bio-Tech Council. Another indicator of Leominster's growing economy is 43D Priority Development Sites for expedited permitting. UMASS Memorial Health Care has a satellite campus there, and 120 companies are tied to manufacturing. Production ranges from medical to military to life science. Leominster's has 2 Opportunity Zones that encourage private reinvestment in redevelopment.

Leominster faces housing and economic challenges. Lower wages affect the labor force and services. Those able to secure employment earn less than in parts of the state. The previous Con Plan noted residents are less likely to work in higher-paying industries. Only the highest-paid employees can afford a home. The 2019 CEDS states that local economies are grappling with the unstable industrial base and transitioning from manufacturing. Table 11 indicates 17% of workers are in manufacturing, yet it is 8% of jobs. There is a mismatch of 11% between jobs/workers in the arts, entertainment, and accommodations. Another issue was hiring mental health/social work positions. There is high demand as the population ages and as the City experiences issues with substance abuse, mental illness, and homelessness. Incomes have not grown at the rate of housing increasing by 5% since 2015 while housing increased 6% and median sales increased 27%. Household wealth remains stagnant, so the Consortium must have an adequate supply of housing and price points to meet needs.



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

### **Introduction**

The CEDS states that the region experienced economic decline in the 20th Century. Industrialized communities suffered the most and revived the slowest. Today, regional urban communities are dominated by manufacturing, such as Leominster's plastics companies. Despite challenges, Leominster will see the largest employment increase by 2035 (1,100-1,300 new employees) - 23% of the total. The City will see a population increase of 3,000 - 17.5% of the total population.

Almost 13% of residents have a disability, and 13% live in poverty. The City has 7 EJ's along Route 2. These, coupled with its isolated location, hinder growth. Better transportation would foster a vibrant economy. Route 2 and the 190 Turnpike are the 2 roads to Leominster. The Commuter Rail stops in Downtown. The Montachusett Regional Transit Authority offers an option with regional routes, peak service times, and out-of-town shuttles.

The EO418 Community Development Plan found Leominster should focus on the following: the Cater Housing area, the Second Street area, Tucker Drive; projects in the Affordable Housing/Rockwell Village Revitalization Initiative; accessory apartments; and multifamily housing through adaptive reuse in RC and RB Zones. The Plan found that the City should focus on the following economic development priorities: the CBD; along State Route 117/Lancaster St; (re)development in commercial/industrial zones; brownfields; and vacant/underutilized buildings.

The government, universities, private businesses, etc. work to train/employ residents. Training includes opportunities in green energy, advanced manufacturing, and entrepreneurship. Remaining dynamic and diverse is critical to success. MassHire North Central Career Center, NewVue, North Central MA Chamber of Commerce, and My Turn provide resources. They work with councils, agencies, etc. on workforce development for any age, ability, or career stage. The Montachusett RPC conducts studies and maintains statistics on economic conditions. Strategic planning utilizes this, particularly the 2009 Comb and Carriage/French Hill Gateway Plus Action Plan, to choose CDBG activities.

## Economic Development Market Analysis

### Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	61	4	0	0	0
Arts, Entertainment, Accommodations	1,906	17	12	1	-11
Construction	816	109	5	9	4
Education and Health Care Services	3,626	303	23	25	2
Finance, Insurance, and Real Estate	785	96	5	8	3
Information	369	9	2	1	-1
Manufacturing	2,712	93	17	8	-9
Other Services	563	86	4	7	3
Professional, Scientific, Management Services	1,398	189	9	16	7
Public Administration	0	16	0	1	1
Retail Trade	2,229	217	14	18	4
Transportation and Warehousing	417	31	3	3	0
Wholesale Trade	690	49	4	4	0
Total	15,572	1,219	--	--	--

**Table 64 - Business Activity**

**Alternate Data Source Name:**

ES202 Data

**Data Source Comments:**

### Labor Force

Total Population in the Civilian Labor Force	22,950
Civilian Employed Population 16 years and over	20,850
Unemployment Rate	9.19



Unemployment Rate for Ages 16-24	22.70
Unemployment Rate for Ages 25-65	7.04

**Table 65 - Labor Force**

Data Source: 2011-2015 ACS

Occupations by Sector		Number of People
Management, business and financial	4,740	
Farming, fisheries and forestry occupations	730	
Service	2,575	
Sales and office	4,610	
Construction, extraction, maintenance and repair	1,580	
Production, transportation and material moving	1,555	

**Table 66 – Occupations by Sector**

Data Source: 2011-2015 ACS

## Travel Time

Travel Time	Number	Percentage
< 30 Minutes	12,030	60%
30-59 Minutes	5,835	29%
60 or More Minutes	2,195	11%
<b>Total</b>	<b>20,060</b>	<b>100%</b>

**Table 67 - Travel Time**

Data Source: 2011-2015 ACS

## Education:

### Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	1,365	190	865
High school graduate (includes equivalency)	4,930	560	1,465
Some college or Associate's degree	4,995	475	1,265
Bachelor's degree or higher	5,940	390	370

Table 68 - Educational Attainment by Employment Status

Data Source: 2011-2015 ACS

### Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	0	150	210	485	680
9th to 12th grade, no diploma	440	390	280	905	835
High school graduate, GED, or alternative	1,310	1,830	1,615	3,510	2,360
Some college, no degree	1,330	1,010	1,025	2,555	930
Associate's degree	35	310	600	1,255	270
Bachelor's degree	400	1,375	1,165	2,185	505
Graduate or professional degree	35	305	580	1,180	565

Table 69 - Educational Attainment by Age

Data Source: 2011-2015 ACS

### Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	26,405

<b>Educational Attainment</b>	<b>Median Earnings in the Past 12 Months</b>
High school graduate (includes equivalency)	31,244
Some college or Associate's degree	34,314
Bachelor's degree	51,829
Graduate or professional degree	69,719

**Table 70 – Median Earnings in the Past 12 Months**

**Data Source:** 2011-2015 ACS

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

Table 11 indicates that education and health care services have the largest share of workers (23 percent), with manufacturing having the second-largest share (17 percent). Naturally, education and health care services also have the largest share of jobs (25 percent). Retail trade has the second-largest share of jobs at 18 percent. The North Central Massachusetts Workforce Investment Board's (NCMWIB) 2020-2022 Strategic Plan identifies the priority industries like Healthcare and Social Assistance, Advanced Manufacturing, and Transportation, Warehousing and Logistics. Their Central MA Regional Workforce Blueprint (2018-2022) also reiterates these industries are the top three workforce priorities. The following are identified as critical for the region: Professional and Technical Services, Construction, Retail/Hospitality, and Education. The CEDS found that the fastest-growing occupations are air conditioning and refrigeration mechanics and installers

**Describe the workforce and infrastructure needs of the business community:**

The greatest needs include affordable housing, water/sewer, and public transportation. During the CPP, Leominster's streets, sidewalks, and other infrastructure were "high" needs. The City pursues beautification, lighting, and safety Downtown with CDBG.

Limited housing and transportation may deter LMI populations from staying in the City. Employers need amenities as the City cannot attract a workforce without them. ACS and wage data reinforce businesses are not paying enough in wages. CEDS data stated housing and transportation were the top regional weaknesses. Increasing transit/multi-modal options is critical for the workforce. The City is working with Fitchburg on the Twin Cities Rail Trail, creating walking and biking opportunities.

Businesses are deterred from Leominster if districts are not serviced by utilities. The City offers broadband and fiber-optics, and has a municipal water/sewer system. However, streets and sidewalks need repair. Topography is also a challenge to road maintenance and sidewalks in need of accessibility upgrades. The cost makes this goal difficult. There is also concern over hazard mitigation and severe weather. The City will advance resilient infrastructure that meets needs for a range of businesses.

Changes in manufacturing are challenging for Leominster, as 17% of workers are in the field. The industry is calling for skilled labor and advanced engineering knowledge. The region's workforce must be able to operate high-tech equipment. Per the analysis, the City would benefit from increasing manufacturing jobs at various skill levels. The same applies to the arts, entertainment, and accommodations industry. The information industry also sees a mismatch between workers and jobs. Leominster has a higher share of workers than employers to hire those workers in each instance. The popularity of the cannabis industry is an opportunity that ranges from cultivating to sales. Leominster and its partners are committed to training and retention strategies, and technical assistance programs that keep up with the evolving workforce.

The CEDS found that planning for the next generation is one of the most significant regional challenges. An aging workforce, insufficient skills, and emerging markets make this a daunting undertaking. Other identified gaps in prior surveys include:

- Communication skills;
- Poor attitude;
- Lack of work experience and skillsets required;
- Inability of employers to match wages; and
- Disconnections between business and government officials.

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

Upgrades in the following areas would have a positive economic impact on the City and the region and assist in workforce development and business support or infrastructure:

- Wastewater, water, and sewer;
- Housing stock;

- Public transportation and access;
- Public realm infrastructure, including streets; and
- Hazard mitigation and climate resiliency/mitigation.

The City utilizes public-private partnerships (PPPs) to forward economic development initiatives, particularly in the two Opportunity Zones. PPP's improve public transportation, utilities, historic preservation, and create affordable housing across the Montachusett region. They are an effective funding stream when government funding is restricted, often with CDBG funds. The CEDS encourages partnerships with multiple public and private entities, including the Montachusett Brownfields Group (MBG).

Other changes that will impact include the relationship with Fitchburg State University, Downtown revitalization, collaboration on technical assistance and workforce development, and the reliance on non-native speakers - a quickly growing population. The ongoing work in Downtown is anticipated to have long-standing economic impacts, as Leominster fortifies connections between Adams Street, expands the Rail Trail, and builds a parking garage. The City is also looking at pedestrian crossings and traffic calming, particularly in front of City Hall and the Library. At this time, the general fund is the only funding source for this project, including design and construction. Funds would be for a planning study and, ultimately, the construction of new traffic measures. Leominster anticipates more commercial/industrial projects. Existing spaces are being filled, and sites are available for new development. As of 2016, the City had approximately 350 acres of developable land available and has received inquiries from businesses.

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

Over 8,000 people have at least a Bachelor's degree in Leominster (8,295 people). This incorporates 1,680 individuals aged 25-34, highlighting the influence of local universities/colleges on the population. Those with a Bachelor's degree earn up to \$20,000 more than high school graduates, and higher-paying jobs are now requiring it. Many employers provide on-the-job training, but as the workforce becomes more competitive, hiring requirements have risen, and most employers require some form of higher education after high school. Educational attainment in the region is slower than in the state, but the CEDS found it is increasing among young professionals. In particular, young women are graduating high school and college at higher rates than their male counterparts. The NCMWIB states that training and education need to be more coordinated and provide pathways that align with reality. Schools such as Fitchburg State University and Mount Wachusett Community College continue to update their curricula to keep pace with trends. Private job training and skills providers, such as NewVue, need to assist youth and adults in acquiring the skills to be competitive. Leominster works with institutions such as the Center for Technical Education, Montachusett Regional Vocational Technical High School, and Nashoba Valley Technical High School on skills development and workforce

training. Many looking for work meet local employers' needs but just need extra help. The North Central Massachusetts Workforce Investment Board and the City collaborate to ensure the labor force is completing training, particularly those out of work and looking for new employment.

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

The Workforce Investment Board identified the following in their Strategic Plan: promote careers in Healthcare and Social Assistance, Advanced Manufacturing, and Transportation and Logistics; increase access for people with barriers to employment. Other initiatives are:

- WORK, Inc. provides services for the MA MRC SES, the DDS-North Central Area Office, and the DTA Fitchburg Office including job readiness, transportation, and job search.
- My Turn, Inc. works with 25 LMI first year students and 15 LMI second year students from the Workforce Investment Area and provides internships/skills to prepare for careers.
- The North Central Career Center provides labor by training the workforce. The Investment Board administers the Center. Partners are the Division of Career Centers, Division of Unemployment Assistance, and Mount Wachusett Community College.
- The Training Resources of America Incorporated (TRA) is a private non-profit providing education and training in Fitchburg. Services include reading, language, and math; obtaining a High School Equivalency Credential; and finding employment.
- The North Central MA Chamber of Commerce collaborates with schools/colleges, internship and career programs, and the HYPE Young Professionals Network. The Chamber offers the AMP it up! Initiative, helping people pursue manufacturing jobs.
- North Central MA Workforce Investment Board, Inc. is the regional workforce investment board under the Federal Workforce Innovation Opportunity Act. It handles policy and oversight for 2 Career Centers in Leominster (the North Central Career Center) and Gardner. They provide the youth with opportunities, skills, and credentials; and offer board members the opportunity to participate in program design and training
- Mount Wachusett Community College is the community college that offers continuing education, workforce development, and support services.
- The Shriver Job Corps Center at Devens is the largest residential education and vocational training program for economically disadvantaged youth. The program is for eligible youth at least 16 years of age that qualify as LMI.

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

Yes

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

The CEDS offers initiatives that coordinate with this Plan and are locally implemented. They are:

- Advance infrastructure and community improvements to support (re)development
- Inventory business assets in all clusters and identify emerging opportunities
- Research what others are doing to support addiction recovery and what would help them enter the workforce
- Use recreation and cultural amenities to market the area
- Monitor the Opportunity Zone program and ways to leverage
- Work with the 5 Chambers and other business organizations to formalize a retention, expansion, and visitation program
- Use entrepreneurial assets to create mentoring opportunities
- Facilitate partner collaboration to address challenges facing the Montachusett Region
- Support career awareness, exploration, and expand learning opportunities that and prepare students
- Offer technical assistance on most appropriate uses of existing industrial properties
- Identify catalyst properties that are challenging and find feasible redevelopment options
- Support efforts to incentivize (re)development of affordable housing
- Focus investments on helping people stay in the area. Support tax policies to incentivize investment in existing/new housing development
- Identify target areas for housing or mixed-use
- Work with health care providers and educational institutions to meet the need for trained healthcare professionals

The City implements goals that align with the CEDS. Staff also work with non-profit and for-profit agencies such as NewVue and Centro Las Americas on activities that enact positive change for those in need.

## Discussion

Applying CDBG to activities that create/retain jobs for LMI households and assist local businesses helps the economy grow. Trends have posed challenges in labor force specialization beyond the lower paying industries. It has been challenging for employers to pay competitive wages; as a result, the local skillsets are rudimentary and unable to meet current needs. The number of jobs remains steady in the region, but incomes are too low to afford available housing. The City will need to utilize multiple resources, partnerships, and programs to maximize available opportunities, attract higher-paying employers, and fund training. Attracting lucrative jobs is the most efficient way LMI populations can afford to live in an area. This is critical for retaining talent from the Fitchburg State University and community colleges, supporting the regional economy, and contributing to the commercial tax base. Incentivizing economic development initiatives through workforce training, infrastructure, partnerships, and streamlined municipal processes must continue.

Furthermore, affordable housing is an economic issue, and the two are interdependent. More affordable housing and wage increases promote long-term prosperity. CDBG funding for planning and administration will also be a top priority to assist businesses and local workers with grant requirements.



## **MA-50 Needs and Market Analysis Discussion**

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

The highest concentrations of Leominster's housing problems are in the southeastern portion of the City, Downtown, and the Comb & Carriage/French Hill area. Defining characteristics of the areas include higher percentages of rental housing, older structures, concentrations of LMI households, and minorities. This information makes recommendations in the Strategic Plan, and developments are encouraged in these areas. It is the responsibility of community development/housing organizations and developers to submit proposals for HOME funding, although the Consortium advocates for affordable housing creation and works with organizations/developers who submit proposals. Because the Consortium must be approached, it is challenging to know where concentrations of housing problems may be forming.

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

Minority residents make up approximately 19 percent of the City's population. Eighteen percent of the City's population is Hispanic/Latino, seven percentage points higher than the County and six percentage points higher than the state. Please see the map below for concentrations of minorities in Leominster by Census tract. The map confirms concentrations in these areas exceed the 31.8 percent threshold in multiple census tracts. Because of this, these groups face a disproportionately greater need than the rest of the population.

This Consolidated Plan defines "concentration" as: "a Census Tract or defined geographic area where the percentage of residents who are minorities is at least 20 percentage points higher than the percentage of minorities in the MSA (or jurisdiction not in an MSA) as a whole," per OMB No. 2577-0269. Concentrations of racial and ethnic groups and LMI families overlap with areas where multiple housing problems exist, where the majority of the rental stock is, and where the highest concentrations of LMI households are, i.e., the older and more urban parts of the community. These concentrations correspond to CDBG service areas, encompassing the Downtown and the Comb & Carriage/French Hill area. Minority concentrations, poverty, and lower-income households inform the decision-making and allocation. Recommendations are based on this information, and developments are encouraged there. Leominster continues to target resources to address the needs of these communities. The City determines the most effective method to address the needs of minorities and LMI families is through targeted housing assistance.

[See Map below]

### **What are the characteristics of the market in these areas/neighborhoods?**

Several characteristics impact the housing market and housing development, including zoning and land use regulations, land availability, development costs, land values, school systems, quality of services, access to transportation, the current housing stock, and availability of employment. However, the characteristics of these concentrated areas have lower rents and housing prices, an older housing stock, lower median incomes, a higher percentage of minorities, more housing problems, higher densities, and more LMI households compared to the rest of the City. These areas see a greater mix of commercial and industrial uses along the major routes.

### **Are there any community assets in these areas/neighborhoods?**

Community assets in these areas include schools, a library, a City Hall; places of worship, open space, parks, recreation facilities, neighborhood groups, housing and social service providers, stores, restaurants and small businesses, community gathering spaces, and some transportation. For many years, the CDBG Program has supported public services activities, infrastructure improvements, economic development, and housing in these areas. The City encourages developers to create affordable housing near these assets, particularly commercial and transit centers.

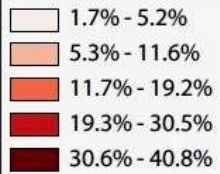
### **Are there other strategic opportunities in any of these areas?**

These areas offer residents the opportunity to be close to Downtown amenities and within walking distance of major activities and services. They provide opportunities to improve public health through active and passive recreation and walkable streetscapes. Strategic opportunities to expand affordable housing and economic opportunities in the City prioritize infrastructure availability, accessibility, and proximity to services and public transportation in these areas. The ongoing creation of opportunities in these areas will provide greater access to housing, reduce housing costs, grow the labor force, and generate tax revenue to improve residential quality of life.

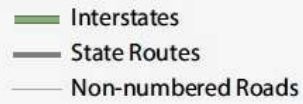
The City focuses improvement efforts on the Downtown and the Comb & Carriage/French Hill neighborhood, located east of Downtown and has been in transition for decades. Several old factories have been renovated for other uses, such as residential or storage, although some continue to be used for industry and manufacturing. Many of the neighborhood's larger homes have been converted into multifamily apartments. Larger apartment buildings have also been developed there. This area has been the subject of grant-funded improvements and planning activities to stabilize/improve the neighborhood, create a walkable environment, and encourage investment in private property and the reuse of older industrial buildings.

# City of Leominster Consolidated Plan

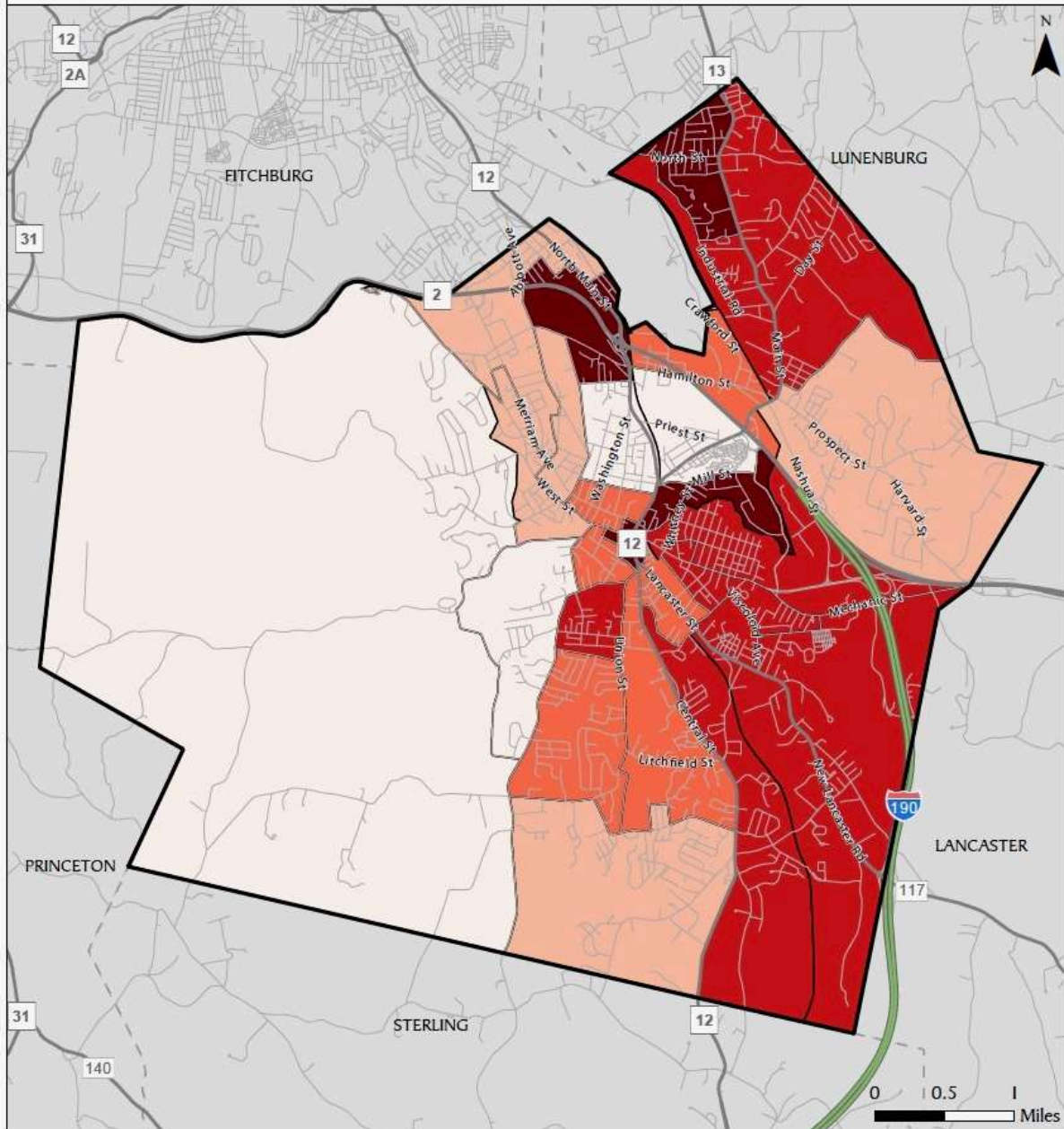
## Minority Population



## MassDOT Roads



Source: City of Leominster, MassGIS,  
MassDOT, US Census Bureau ACS  
2015-2019, and HUD CHAS 2013-2017



**Leominster Minority Map**

## **MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)**

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

From employment to education to everyday activities, internet access and broadband connectivity can be critical for many important functions for a community and its residents. Telecommuting and remote access to workplaces, schools, and healthcare have become common since the COVID-19 pandemic, and meeting these needs requires reliable internet connections throughout the community. According to the FCC, internet service is considered broadband if download speeds meet or exceed 25 Mbps and upload speeds meet or exceed 3 Mbps. The average household in Leominster is served by three broadband providers, 11 with 99.49 percent of the community served by three or more providers. Cable, fiber, and DSL connections are widely available (Comcast Xfinity and Verizon) and satellite internet service (Viasat, formerly Exede, and HughesNet).

While internet access is vital to many groups, LMI households are most affected by lack of information or lack of access to information. Resources available to LMI Leominster residents seeking more affordable internet options are not in existing studies. Still, Comcast and Verizon offer discounted plans for low-income households eligible for public assistance and federal benefits. Income-eligible Leominster residents can apply for Internet Essentials from Comcast or Lifeline from Verizon.

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

Limited competition for broadband services can drive up prices, so Leominster residents value having options for broadband providers. Comcast, Verizon, Viasat, and HughesNet services are available to more than 95 percent of residents. These are nationwide providers, and there are no local provider options available.

## **MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)**

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

The Montachusett Regional Planning Commission drafted a Natural Hazard Mitigation Plan Update in 2015 that reflects the short and long-term risks the City faces. According to the Plan, Leominster is at high risk for heavy rain, snowmelt, nor'easters, severe thunderstorms, and heavy snow. Leominster is at moderate risk for ice jams, high winds, hurricanes, tornados, ice storms, blizzards, major urban fires, wildland fire, drought extreme temperatures, and landslides. The City is at low risk for dam failure, earthquakes, and tsunamis. An analysis of the FIRM flood hazard areas indicates 1,260.39 acres of the 100-year floodplain or 6.64 percent of the City. Additional analysis states that 18.27 percent of the floodplain (230.33 acres) is developed. There are 301 structures in the floodplain or 2.06 percent of structures in the community. The buildings are multiplied by the building values (determined by the Department of Revenue) to equal a potential loss of \$457,185,900. Since the National Flood Insurance Program (NFIP) initiation in the City, there have been twenty-five flood insurance claims totaling \$98,076.97 in payments. There are four repetitive loss properties in Leominster totaling \$38,274.40 in claims.

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

Homeless, LMI households and families, children, the elderly, and the disabled are vulnerable populations at higher risk of the impacts and the cost barriers associated with climate change. LMI households are less likely to recover financially from extreme weather events, such as a loss of utilities, property damage, blackouts from downed trees, flooding, and power lines. Each of these impacts is often a result of worsening thunderstorms, winds, winter storms, and flash flooding. Aging infrastructure in underserved neighborhoods offers inadequate shelter and mobility options, especially when roads become impassable. Needs Assessment findings confirm that Census tracts with lower median household incomes have the highest percentages of housing units built before 1980. Due to their age, these homes may experience trouble withstanding extreme weather. The Community Resilience Building (CRB) Workshop as part of the state's Municipal Vulnerability Preparedness (MVP) grant highlighted public concerns. Still, planning from the regional perspective underscored ongoing concerns with Environmental Justice (EJ) communities and vulnerable populations, including residents whose primary language is not English, older adults, and the homeless. The Natural Hazard Mitigation Plan Update discussed the need for coordinated emergency preparedness to support organizations servicing vulnerable populations.



# Strategic Plan

## SP-05 Overview

### Strategic Plan Overview

The Strategic Plan and PY48 AAP will focus on eligible CDBG activities between 2022-2026, including affordable housing, public services, and employment for LMI households. Rental and ownership rehabilitation and nonprofit development continue to be priorities (outlined in the 2022-2026 HOME Consolidated Plan) as the need for more affordable housing grows. Leominster allows multifamily development, which has facilitated development. Housing activities are targeted in the Comb and Carriage Core Area, comprised of LMI households and concentrated housing problems. The Comb and Carriage Core Area exhibits the greatest need for CDBG and HOME funding. Non-housing activities are also targeted in this area. However, in recent years, Census tracts 7092 and 7094 exceed the 52.7 percent LMI threshold. Please see the Needs Assessment to see which tracts are over 52.7 percent LMI. CDBG/HOME allocations and program income (PI) fund activities designated in this Plan. PI is received before the grant closeout and can be retained if income is treated as additional CDBG funds. Section SP-35 discusses resources available for these activities over this Plan's lifespan. These resources do not include HUD funding from the Leominster Housing Authority or other federal and state sources. Housing rehabilitation in Leominster and funded by the HOME Consortium is managed by the City of Fitchburg. More details about activities in Leominster managed by the Consortium are in the HOME Consolidated Plan and PY48 AAP submitted by Fitchburg.

The Strategic Plan will address issues by establishing priorities and goals. Issues include a limited affordable housing, code enforcement, high cost-burden, concentrated housing problems, disproportionately greater instances of housing problems for minorities, needs for the homeless, and a lack of youth programming, transportation, and assistance with job creation. The Consortium will do this by creating housing at various price points, prioritizing opportunities for LMI and special needs populations, evaluating programs/activities, focusing on flexible activities to meet requirements, and seeking funding and development opportunities with nonprofit partners. The Citizen Participation Plan (CPP), data analyzed for the Needs Assessment and Market Analysis, and information provided by staff resulted in the following Plan priorities, reiterated in sections SP-25, ES-05, and the PY48 AP-20. The Plan designates priorities understanding the ability to meet them is affected by funding availability and application submissions.

### CDBG Priorities:

Assistance for Youth. The City will commit available CDBG funds to youth services, particularly after-school programs, childcare, and preschool programs. Although there is a 15 percent cap on the amount

allocated to public services each year, the City recognizes the need for activities that address the root causes of poverty and homelessness and offer programs with an array of positive outcomes to “stretch” the available dollars. Therefore, the City will prioritize service programs for elementary aged, middle-school, and teens that complement successful projects/activities today, such as the Boys and Girls Club. The CPP process underscored the importance of the multiplier effect when investing in youth, generating a measurable return on investment.

**Economic Development.** The City will prioritize economic development that invests in intellectual capital, growing the workforce's skillsets, creating jobs, bolstering opportunities for small, women owned, and minority-owned businesses. This is an ongoing regional concern based on the data. The CDBG program will leverage funds to reach as many eligible businesses as possible; the best way is to invest directly via technical assistance and loans that lay the foundation for a sustainable business model. As the world becomes increasingly digital, the need for activities such as storefront improvements is not as necessary. Investment in technical assistance will help business owners develop viable business plans and secure the funding to revitalize their storefronts individually, improve the business districts, and create the tax base to sustain those efforts. However, eligible applicants can use CDBG funds to pursue such upgrades and improvements.

**Public Infrastructure and Facilities.** Transportation expansion and improvement were cited repeatedly as a priority for this Consolidated Plan. Transportation infrastructure, including streets and sidewalks, will meet the need for greater walkability and accessibility Downtown. The City will also prioritize street beautification efforts, street lighting, parks, recreation facilities, and open space improvements over the upcoming five years.

**PY48 CDBG Priorities.** The City understands that overcoming hardships presented by COVID-19 is a top priority for the PY48 AAP. Given these circumstances, eligible CDBG activities such as technical assistance will likely have a higher priority in the first year of this Consolidated Plan. At this time, businesses are remaining stable and navigating the reopening phase; the City will assist those most in need during this time.



## SP-10 Geographic Priorities - 91.415, 91.215(a)(1)

### Geographic Area

Table 71 - Geographic Priority Areas

1	<b>Area Name:</b>	Comb & Carriage Core Area
	<b>Area Type:</b>	Local Target area
	<b>Other Target Area Description:</b>	
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	Other
	<b>Other Revital Description:</b>	Infrastructure Upgrade
	<b>Identify the neighborhood boundaries for this target area.</b>	The Comb & Carriage Core Area is between Downtown and Whitney Field Mall. The area is bound by Mechanic Street to the south, Main Street to the west, Mill and Bishop Streets, and Monoosnoc Brook to the North. The district lies just east of the Downtown business district and includes several key institutions/centers.
	<b>Include specific housing and commercial characteristics of this target area.</b>	The area is an urban center with older industrial buildings and manufacturing uses. The majority of the housing is larger single-family homes converted into multifamily apartment buildings. The area has a history of challenged properties, foreclosures, and an imminent need for revitalization and stabilization
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	The area contains one block group where over 51% of households are LMI. A community-wide survey was available during the CPP, and organizations representing and working in these areas provided consultation for this plan. All advertising was publicly available, each meeting was open to the public, and translators were available upon request.
	<b>Identify the needs in this target area.</b>	Based on the CPP and data analysis, the greatest needs within the area include infrastructure upgrades and street improvements, affordable housing, building and health code enforcement, and parks/recreation/ open space facility improvement and maintenance.

	<b>What are the opportunities for improvement in this target area?</b>	Opportunities for improvement are based on the continuation of Entitlement programs. The City continues to seek alternative funding and match opportunities, including local, state and federal resources whenever possible.
	<b>Are there barriers to improvement in this target area?</b>	The greatest barriers are limited availability of federal and state funding, limitations to implementation, older homes, poor property conditions, foreclosures, and lower incomes.

### General Allocation Priorities

Describe the basis for allocating investments geographically within the state

The City targets non-housing activities in the Comb and Carriage Core Area. According to the Gateway Plus Action Plan, the area has a high concentration of minorities, substandard housing, aging infrastructure, and housing problems (as defined by HUD). The Core Area is in the center of the City, comprises eight of the City's nine LMI block groups, and exceeds the 52.7 percent LMI threshold. The area has nearly 25 percent minority households, compared to 15 percent in Leominster as a whole. Fifteen percent of residents are foreign-born compared to ten percent citywide. The median income is \$15,500 below the City's median and \$21,100 below the state's median. The Gateway Plus Action Plan states that at the time of their analysis, 16 percent of the population lived below the poverty level compared to 9.5 percent citywide. The City continues to direct large portions of CDBG funds to address underserved needs of the area's LMI population. Housing activities and HOME funding are also targeted in this area and those designated in the HOME Consortium's Consolidated Plan. Fitchburg has a Housing Strategy Area, which is mainly older urban neighborhoods. Homeowner Rehabilitation funds are distributed in these areas to income-eligible beneficiaries based on applications. Development incentives, referrals, and technical assistance to property owners and developers are prioritized, ensuring funds are expended promptly and meet written agreement requirements. Administration of HOME and CDBG programs guarantees each City is assisting their target areas equitably.

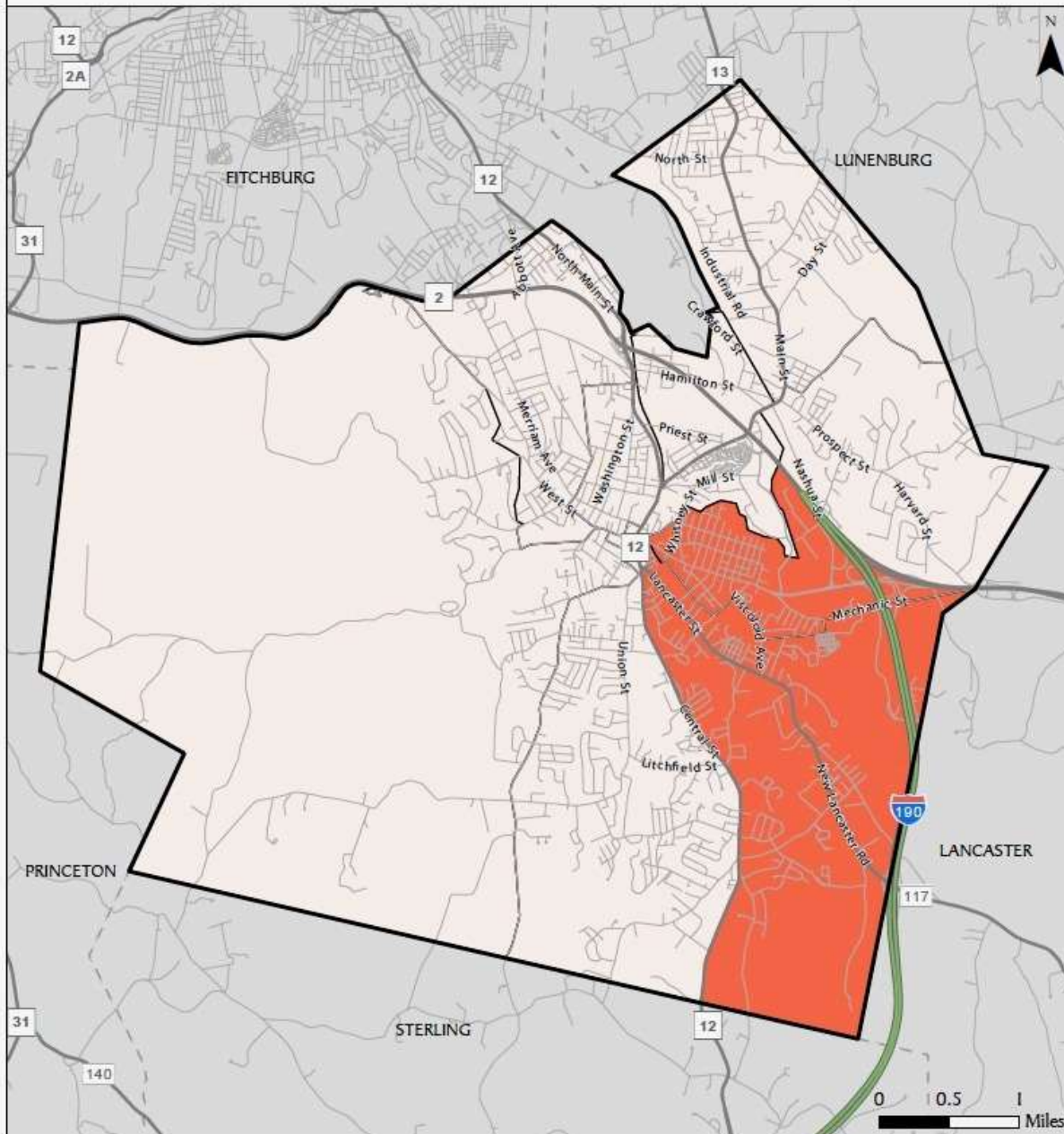
[See Map below]

# City of Leominster Consolidated Plan

Low-Mod Income      MassDOT Roads  
 50.9% or less      Interstates  
 51% or more      State Routes  
                          Non-numbered Roads



Source: City of Leominster, MassGIS,  
 MassDOT, US Census Bureau ACS  
 2015-2019, and HUD CHAS 2013-2017



**Leominster Low-Mod Tract Map**

## SP-25 Priority Needs - 91.415, 91.215(a)(2)

### Priority Needs

Table 72 – Priority Needs Summary

1	<b>Priority Need Name</b>	Public Facilities and Infrastructure
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Chronic Homelessness Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Non-housing Community Development
	<b>Geographic Areas Affected</b>	Comb & Carriage Core Area
	<b>Associated Goals</b>	Improve Public Facilities & Infrastructure
	<b>Description</b>	This need includes streetscape improvements; sidewalk repairs; street beautification; park improvements and maintenance; ADA-compliant upgrades, senior centers, PHA properties, youth centers, and homeless shelters.
	<b>Basis for Relative Priority</b>	Consistent with the efforts to improve public infrastructure and make public facilities accessible and ADA-compliant. Also forwards neighborhood revitalization efforts and improves the quality of life for the population.
2	<b>Priority Need Name</b>	Public Services
	<b>Priority Level</b>	High

<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Victims of Domestic Violence Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
<b>Geographic Areas Affected</b>	Comb & Carriage Core Area
<b>Associated Goals</b>	Provide Public Services Provide Services for Special Needs Populations Assist Homeless Individuals & Families Provide Services for Youth Assist the Elderly
<b>Description</b>	This need includes prioritizing services relating to homelessness, youth, the elderly, and other special needs populations. The City recognizes the interconnectivity of certain issues on the cycle of poverty. Therefore, it is working to eliminate those issues by providing various supportive services, including programs that offer housing. Provision of services will focus on the most vulnerable populations and improving their quality of life
<b>Basis for Relative Priority</b>	Consistent with findings from the data analysis, the CPP, and past planning efforts. The need responds staff and public desires to address service provision issues, increase neighborhood-based services, and provide more youth/child programming.

3	<b>Priority Need Name</b>	Homeless Needs
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Non-housing Community Development
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Assist Homeless Individuals & Families
	<b>Description</b>	To reduce individual and family homelessness by providing services and shelter to homeless families and individuals. The City and the CoC are united in their mission to end homelessness by supporting nonprofit providers and shelters, minimizing trauma caused by homelessness, promoting access to programs, and optimizing self-sufficiency among individuals and families.
	<b>Basis for Relative Priority</b>	Consistent with findings from the data analysis, the CPP, and prior planning efforts. The need aligns with the city's efforts to address homelessness/chronic homelessness and contributing factors to homelessness by providing affordable housing, homeless assistance, services for at-risk populations, and a better quality of life.
4	<b>Priority Need Name</b>	Affordable Housing
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Chronic Homelessness Individuals Elderly Frail Elderly Persons with Physical Disabilities
	<b>Geographic Areas Affected</b>	Comb & Carriage Core Area
	<b>Associated Goals</b>	Increase Affordable Housing Opportunities
	<b>Description</b>	This need helps preserve, maintain, and increase affordable housing stock, particularly those occupied by LMI individuals and families. The need also helps revitalize neighborhoods and preserve the physical/financial viability of existing housing.
	<b>Basis for Relative Priority</b>	Consistent with findings from the data analysis, the CPP, and prior planning efforts. The need aligns with the area's efforts to revitalize the neighborhood, increase public safety through code enforcement, and continue lead-based paint abatement
5	<b>Priority Need Name</b>	Code Enforcement
	<b>Priority Level</b>	High
	<b>Population</b>	Low Moderate Large Families Families with Children Elderly Elderly Frail Elderly
	<b>Geographic Areas Affected</b>	Comb & Carriage Core Area
	<b>Associated Goals</b>	Increase Affordable Housing Opportunities

	<b>Description</b>	This need helps to preserve and maintain existing affordable housing opportunities, particularly units occupied by LMI households. The need also helps revitalize neighborhoods and preserve the physical/financial viability of rental and ownership properties. The City will rehab/repair and maintain properties that are affordable and accessible to residents with a range of household needs. The City hopes to continue to grow the supply of housing in this manner, prioritizing building and code improvements that address safety concerns.
	<b>Basis for Relative Priority</b>	Consistent with findings from the data analysis, the CPP, and past planning efforts. High success rate in the City given existing market conditions. The need aligns with the city's efforts to revitalize neighborhoods, create healthier and more viable living environments for LMI households, grow the housing stock, and increase public safety through code-compliant housing.
6	<b>Priority Need Name</b>	Assistance for Youth
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Public Housing Residents Victims of Domestic Violence
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Provide Services for Youth
	<b>Description</b>	This need includes the prioritization of services relating to youth. The City recognizes the interconnectivity of certain issues on the cycle of poverty. Therefore, it is working toward eliminating those issues for children by providing various supportive service programs, including childcare, after-school programs, and programs for preschool children. Provision of these services will focus on the most vulnerable populations and improving their quality of life.
	<b>Basis for Relative Priority</b>	Consistent with findings from the data analysis, the CPP and past planning efforts. The need responds to city and citizen desires to provide more youth/child programming in the City.
7	<b>Priority Need Name</b>	Assistance for the Elderly and Frail Elderly



	<b>Priority Level</b>	High
	<b>Population</b>	Elderly Elderly Frail Elderly
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Assist the Elderly
	<b>Description</b>	This need includes prioritizing services relating to the elderly and frail elderly. The City recognizes the interconnectivity of certain issues on the cycle of poverty. Therefore, it is working toward eliminating those issues for seniors by providing various supportive service programs, including supportive housing/in-home services, improvements for those with disabilities, nutritional meals, and senior center programming. Provision of these services will focus on the most vulnerable populations and improving their quality of life.
	<b>Basis for Relative Priority</b>	Consistent with findings from the data analysis, the CPP and past planning efforts. The need responds to staff and public desires to provide more senior/elder programming.
<b>8</b>	<b>Priority Need Name</b>	CDBG Administration and Planning
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	CDBG Planning & Administration
	<b>Description</b>	Administration of CDBG funds and planning activities/programs that help leverage state and federal resources for housing and community development efforts.
	<b>Basis for Relative Priority</b>	Consistent with the city's efforts to improve the quality of life for all residents by allocating CDBG funding to eligible programs

## **Narrative (Optional)**

The City maximizes its allocation by establishing priority needs. Housing creation, preservation, and rehabilitation through code enforcement and nonprofit partnerships are the most effective ways to help the Consortium's special needs populations. They are also the best strategies to increase the number of households, diversify the housing stock, build household wealth, and boost the economy. Investment in homeless programs, facilities and infrastructure, improvements in the Downtown and target areas, and services for the youth, seniors, and the homeless are effective ways to address needs based on the allocation amount and information gleaned from the CPP process. The City distributed a Community Needs Survey to residents, which asked participants to rank needs based on priorities. The top needs were: street improvements, housing rehabilitation and repair, after-school programs, in-home services to frail elderly, and homeless facilities, respectively. The City aligns its priorities with the outcomes identified in HUD's Community Planning and Development (CPD) Outcome Performance Measurement System: providing decent housing, creating suitable living environments, and creating economic opportunities.

## SP-35 Anticipated Resources - 91.420(b), 91.215(a)(4), 91.220(c)(1,2)

### Introduction

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

### Anticipated Resources

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

Table 73 - Anticipated Resources

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

CDBG leverages resources via the following activities:

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

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

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

and property improvements at the Louis Charpentier Playground in the Comb & Carriage District. The area is a densely populated low-income neighborhood that has been historically underserved.

## **Discussion**

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

## SP-40 Institutional Delivery Structure - 91.415, 91.215(k)

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

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
LEOMINSTER	Government	Economic Development Homelessness Non-homeless special needs Ownership Planning Rental neighborhood improvements public facilities public services	Jurisdiction
LEOMINSTER HOUSING AUTHORITY	PHA	Homelessness Non-homeless special needs Planning Public Housing Rental	Jurisdiction
NewVue Communities, Inc.	CHDO	Economic Development Ownership Rental public services	Jurisdiction

**Table 74 - Institutional Delivery Structure**

### Assess of Strengths and Gaps in the Institutional Delivery System

Leominster's CDBG and HOME programs work with public and private organizations to accomplish Consolidated Plan goals and meet priority needs through various activities. The City has a network of trained and highly experienced organizations to address needs via its institutional structure. A cooperative infrastructure exists between the City, the LHA, public and private organizations, local developers, and the Consortium's CHDOs. These groups collaborate to oversee housing and community development activities for populations experiencing the greatest need. The Consortium was formed to collaborate, share resources, and strategically plan for the future of the Twin Cities, which has required the participation and support of City and state officials, service providers, and private citizens.

Furthermore, the CDBG Program contracts with private housing contractors to complete rehabilitation projects. Non-housing activities work with City departments to accomplish tasks related to certain projects. No known policies would negatively affect costs or the incentives to develop, maintain, or improve CDBG programs. The main obstacles to implementation are funding availability, staff capacity, adequate resources, and challenges with leveraging resources. Leominster has a Grants Administrator to apply for available opportunities, which helps overcome issues with leveraging funds. The Grants Administrator seeks grants for activities the CDBG program would have difficulty managing alone - economic development, abandoned/foreclosed housing, open space and recreation, and infrastructure improvements. Nevertheless, the institutional delivery system maintains strong local management of activities over the forty years it has been in place.

#### **Availability of services targeted to homeless persons and persons with HIV and mainstream services**

<b>Homelessness Prevention Services</b>	<b>Available in the Community</b>	<b>Targeted to Homeless</b>	<b>Targeted to People with HIV</b>
<b>Homelessness Prevention Services</b>			
Counseling/Advocacy	X	X	
Legal Assistance	X		
Mortgage Assistance	X		
Rental Assistance	X	X	
Utilities Assistance	X	X	
<b>Street Outreach Services</b>			
Law Enforcement	X	X	
Mobile Clinics			
Other Street Outreach Services		X	
<b>Supportive Services</b>			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X	X	
Employment and Employment Training	X	X	
Healthcare	X	X	
HIV/AIDS	X		X
Life Skills		X	
Mental Health Counseling	X	X	
Transportation	X	X	
<b>Other</b>			
	X	X	

**Table 75 - Homeless Prevention Services Summary**



**Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)**

The Consortium has several resources to provide targeted service to the homeless, particularly chronically homeless individuals and families, families with children, veterans and their families, unaccompanied youth, and those with HIV/AIDS. Emergency shelter providers include Our Father's House, Inc., YWCA of Central MA/Battered Women's Resources, Inc., South Middlesex Opportunity Council, Inc., LUK, Inc., and North Star Family Services. These resources service the entire Consortium, offering services in addition to those offered by the CoC. Supportive services help achieve housing stability, self-sufficiency, and employment. Case managers assist with financial management, tenancy issues, access to employment, transportation, food, medical care, and other programs in Table 22. Local governments, housing authorities, and other local stakeholders partner with the CoC and other regional resources to create affordable housing, particularly transitional and permanent supportive housing for homeless special needs populations. This support comes in the form of unit provision (family and elderly/disabled units), upgrades, and rental subsidies. Making Opportunity Count (MOC) offers specialized services for those with HIV/AIDS and who are homeless/at risk. Their CARE AIDS Supportive Housing Program provides prevention services for individuals living with HIV/AIDS and their families. Prevention services include housing search, rental start-up assistance, rent and utility arrearage, furnishing referrals, advocacy, landlord mediation, and eviction prevention. Lastly, UMass Memorial Medical Center in Fitchburg provides medical case management and peer support for persons with HIV/AIDS.

The Consortium takes a comprehensive approach by investing CDBG in homelessness, emergency shelter, transitional/supportive housing, youth services and development, mental health, substance abuse treatment, and job creation. For example, the Economic Development Coordinator and the Business Development Coordinator - funded by CDBG - work closely with local businesses to create/retain jobs for the LMI population. CDBG programs supports the Spanish American Center's Referral and Advocacy Project's caseworker, who assists LMI and minority populations in completing applications for jobs and housing. These efforts supplement HOME funds to LMI housing activities and encourage like-minded applicants to come forward.

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

The strengths of the delivery system include the high level of collaboration among providers, nonprofits, local government, and other stakeholders. Collaborators prioritize homelessness and are dedicated to providing permanent supportive housing, supportive transitional housing, and emergency shelter services to address the outstanding needs. Collaborators understand the importance of a coordinated approach to ending homelessness and the need to continuously work toward that goal. Collaborators

attempt to educate and raise awareness around homelessness as much as possible, with most information sessions/activities open to the public and, in some instances, free. However, funding availability, staff capacity, adequate resources, and challenges with leveraging other resources are gaps that inhibit helping more homeless and special needs clients and ending the cycle of homelessness.

**Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs**

Leominster's strategy to overcome institutional gaps while addressing priority needs is to supplement funding with additional opportunities as much as possible. The City's full-time Grants Administrator seeks out those additional opportunities and applies for them. Leominster also has an annual allocation process for CDBG activities. Meetings are held on an as-needed basis throughout the process to collect information about needs, provide assistance in the application process, and report on annual program funding. When applicable, community development staff also participate in outside community meetings and collaborate with Leominster Housing Authority on several activities.

## SP-45 Goals - 91.415, 91.215(a)(4)

### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Increase Affordable Housing Opportunities	2022	2026	Affordable Housing	Comb & Carriage Core Area	Affordable Housing Code Enforcement	CDBG: \$481,898	Homeowner Housing Rehabilitated: 10 Household Housing Unit  Housing Code Enforcement/Foreclosed Property Care: 700 Household Housing Unit
2	Provide Public Services	2022	2026	Non-Housing Community Development	Comb & Carriage Core Area	Public Services	CDBG: \$66,724	Public service activities other than Low/Moderate Income Housing Benefit: 450 Persons Assisted
3	Improve Public Facilities & Infrastructure	2022	2026	Non-Housing Community Development	Comb & Carriage Core Area	Public Facilities and Infrastructure	CDBG: \$481,898	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 600 Persons Assisted
4	Provide Services for Special Needs Populations	2022	2026	Non-Homeless Special Needs	Comb & Carriage Core Area	Public Services	CDBG: \$66,724	Public service activities other than Low/Moderate Income Housing Benefit: 25 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Assist Homeless Individuals & Families	2022	2026	Homeless	Comb & Carriage Core Area	Public Services Homeless Needs	CDBG: \$66,724	Public service activities other than Low/Moderate Income Housing Benefit: 50 Persons Assisted
6	Provide Services for Youth	2022	2026	Non-Housing Community Development	Comb & Carriage Core Area	Public Services Assistance for Youth	CDBG: \$66,724	Public service activities other than Low/Moderate Income Housing Benefit: 200 Persons Assisted
7	Assist the Elderly	2022	2026	Non-Homeless Special Needs	Comb & Carriage Core Area	Public Services Assistance for the Elderly and Frail Elderly	CDBG: \$548,622	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 20 Persons Assisted  Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 250 Households Assisted
8	CDBG Planning & Administration	2022	2026	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	Comb & Carriage Core Area	CDBG Administration and Planning	CDBG: \$444,829	Other: 1 Other

**Table 76 – Goals Summary**

## Goal Descriptions

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

7	<b>Goal Name</b>	Assist the Elderly
	<b>Goal Description</b>	To annually promote services relating to the elderly, frail, elderly, and seniors. Working to eliminate issues through the provision of a variety of CDBG programs.
8	<b>Goal Name</b>	CDBG Planning & Administration
	<b>Goal Description</b>	Administration of CDBG funds and planning activities that include grant writing to leverage other federal and state resources.

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)**

The Jurisdiction will assist twenty extremely low, low, and moderate-income households per year (100 between 2022 and 2026) via their homeowner rehabilitation programs and other buyer/rental activities. Of these households, twenty are expected to be extremely low-income, five are expected to be very low-income, and seventy-five are expected to be moderate-income.



## **SP-65 Lead-based Paint Hazards - 91.415, 91.215(i)**

### **Actions to address LBP hazards and increase access to housing without LBP hazards**

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

- The Housing Rehabilitation Program uses CDBG funding to allow qualified homeowners to take out a 0 percent deferred payment loan to make necessary improvements to their homes. The funds are used to repair/replace substandard housing conditions, improve energy efficiency, and lead abatement when necessary.
- The Board of Health has two Code Enforcement Inspectors. CDBG funds one position and focuses on inspecting housing in the Core Area, with higher percentages of LMI residents. This person also conducts lead paint determinations as part of code enforcement work, followed by de-leading units.
- The City enforces the Massachusetts Lead Law and all pertinent legislation in new residential construction, confirming any new affordable units are free of lead-based paint hazards. The Consortium vigorously enforces the lead-based paint regulations for all of its housing activities and supports the efforts to attract lead paint removal resources.

### **How are the actions listed above integrated into housing policies and procedures?**

All housing funded with CDBG and HOME must meet requirements for containment or removal of lead-based paint under the Massachusetts Lead Law. Leominster addresses lead-based paint hazards in their Homeowner Rehabilitation programs. All rehabilitation projects or projects receiving assistance must comply with federal deleading policies. Building codes require removing lead-based paint hazards in units occupied by children under six. This ensures that all projects receive full rehabilitation, including lead inspection and risk assessment. Rental and ownership projects funded with HOME dollars must comply with the Rehabilitation Standards policy and abate any hazards. HOME projects must meet requirements irrespective of whether a child under six is in the unit. CDBG funded urgent repair and accessibility projects are reviewed on a case-by-case basis. Abatement in homes with no children or children regularly visiting is reviewed based on the cost of the work, whether it is an emergency, and if funding is available. Homeowner Rehabilitation projects eligible for Lead-Based Paint Hazard Control Funding are referred to the program's standard procedure to maximize available dollars. The actions listed are part of the typical protocol for CDBG and HOME programs when managing rehabilitation projects, code enforcement, and new developments.





## **SP-70 Anti-Poverty Strategy - 91.415, 91.215(j)**

### **Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families**

Ten percent of Leominster families are living below the poverty level. Recognizing that resources are inadequate, the Consortium follows a comprehensive approach to investing funds in homelessness, emergency shelter, transitional housing, youth services and development, mental health, substance abuse treatment, and job creation. These supplement HOME funds for housing activities and encourage applicants to come forward. Through this Strategic Plan, the City will reduce families with incomes at/below the poverty level. Specific anti-poverty efforts include producing/rehabilitating affordable housing through code enforcement, supporting developers, assisting LMI households find and keep employment and housing, and supporting businesses. Both cities work with food pantries, service providers, faith-based institutions, and relevant groups to address needs concerning poverty-level families. The Economic Development Coordinator and the Business Development Coordinator (funded by CDBG) work with businesses to create/retain jobs for LMI populations. CDBG also support the Spanish American Center's Referral and Advocacy Project's caseworker, who assists minority populations in completing job/housing applications. The Montachusett Opportunity Council (MOC) - the region's anti-poverty agency - has programs to reduce poverty in the Consortium:

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

These efforts supplement HOME and CDBG funds for eligible activities and encourage like-minded applicants to come forward. Through this AAP, the City aspires to reduce the number of families with incomes at/below the poverty level.

### **How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan?**

The City collaborates with groups to carry out its anti-poverty strategy and maximize efforts. In addition to MOC and the LHA, the City works with the Consortium's CHDO, NewVue Communities. Most CDBG activities are funded with other programs. Staff work with citizens, departments, and public/private sectors to coordinate funds for LMI families. This Con Plan's goal of increasing affordable housing aligns

with goals of like-minded agencies, efforts in place for LMI populations and workers. The more workers the City attracts, the greater the need for affordable and accessible housing. CDBG/HOME programs that influence household incomes include code enforcement, lead abatement, self-sufficiency programs, and other social services. CDBG/HOME also indirectly influence households living in poverty by reducing costs associated with development, public facilities and infrastructure, economic development programs, and access to services. The following activities are likely to be funded throughout the lifespan of this Plan:

- Housing rehabilitation, including emergency repair programs, energy efficiency improvements, and lead abatement;
- Childcare and youth programs;
- Programs to assist the elderly;
- Public housing improvements;
- Infrastructure improvements and neighborhood revitalization;
- Affordable rental and ownership housing via development and rehabilitation; and
- Economic development initiatives that provide jobs and workforce training.

Public/private agencies meet to discuss issues and concerns. As Consortium members, Fitchburg and Leominster work together on housing investments and strategies. Both cities are members of the Central Massachusetts Housing Alliance, which includes financial institutions, nonprofits, and government partners. Members work with credit and banking institutions on housing for LMI residents. Leominster is a member of the Worcester CoC, which represents organizations dedicated to helping the homeless, chronically homeless, and those at-risk. City staff may attend meetings and consult on an as-needed basis. The Central Massachusetts Housing Alliance receives HUD homelessness funds and coordinates services in the CoC, improving service delivery and equitable distribution to areas in need. The City consults with its CoC partners, boards and commissions, and providers to leverage resources. Staff may also attend meetings of the Leominster Housing Authority.

## **SP-80 Monitoring - 91.230**

**Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements**

The Office of Planning, Development, CDBG, and Housing manages Leominster's CDBG program and coordinates housing and community development activities. Program staff has the authority to monitor all activities included in the Five-Year Consolidated Plan and in each Annual Action Plan (AAP) to certify compliance with the HUD's rules and regulations. For activities funded in Leominster and Fitchburg, Leominster staff shall work to coordinate tasks and responsibilities with Fitchburg staff. To ensure compliance with program requirements, CDBG staff perform periodic subrecipients monitoring to review all aspects of the funded activity for compliance. These formal visits are in addition to informal visits throughout the program year. Staff maintains contact with subrecipients through City staff. For example, the Housing Rehabilitation Program works with the Building and Health Departments to conduct on-site inspections and takes appropriate action to ensure compliance with health and building codes. To remain consistent with monitoring requirements, Leominster includes a Performance Measurement category in its monitoring form and the CDBG Application. The City requires subrecipients to submit an audit according to the Federal Single Audit Act/A-133. Implementing the A-133 audit requirement ensures subrecipients that receive over \$500,000 of federal funds are audited per OMB Circular A- 133. CDBG staff reviews each funded activity's performance throughout the year by collecting monthly reports, program management, and quarterly reporting data. CDBG staff ensure that information submitted to HUD through its Integrated Disbursement Information System (IDIS) is correct and complete.

## Expected Resources

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

### Introduction

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

### Anticipated Resources

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

Table 77 - Expected Resources – Priority Table

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

CDBG leverages resources via the following activities:

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

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

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

**Discussion**

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



## Annual Goals and Objectives

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

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Increase Affordable Housing Opportunities	2022	2026	Affordable Housing	Comb & Carriage Core Area	Affordable Housing Code Enforcement		Homeowner Housing Rehabilitated: 10 Household Housing Unit Housing Code Enforcement/Foreclosed Property Care: 700 Household Housing Unit
2	Provide Public Services	2022	2026	Non-Housing Community Development	Comb & Carriage Core Area	Public Services	CDBG: \$66,724	Public service activities other than Low/Moderate Income Housing Benefit: 450 Persons Assisted
3	Improve Public Facilities & Infrastructure	2022	2026	Non-Housing Community Development	Comb & Carriage Core Area	Public Facilities and Infrastructure	CDBG: \$481,898	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 600 Persons Assisted
4	Provide Services for Special Needs Populations	2022	2026	Non-Homeless Special Needs	Comb & Carriage Core Area	Public Services	CDBG: \$66,724	Public service activities other than Low/Moderate Income Housing Benefit: 25 Persons Assisted
5	Assist Homeless Individuals & Families	2022	2026	Homeless	Comb & Carriage Core Area	Public Services Homeless Needs	CDBG: \$66,724	Public service activities other than Low/Moderate Income Housing Benefit: 50 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Provide Services for Youth	2022	2026	Non-Housing Community Development	Comb & Carriage Core Area	Assistance for Youth	CDBG: \$66,724	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 200 Persons Assisted
7	Assist the Elderly	2022	2026	Non-Homeless Special Needs	Comb & Carriage Core Area	Assistance for the Elderly and Frail Elderly	CDBG: \$548,622	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 20 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 250 Households Assisted
8	CDBG Planning & Administration	2022	2026	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	Comb & Carriage Core Area	CDBG Administration and Planning	CDBG: \$444,829	Other: 1 Other

**Table 78 – Goals Summary**

## Goal Descriptions

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

8	<b>Goal Name</b>	CDBG Planning & Administration
	<b>Goal Description</b>	Administration of CDBG funds and planning activities that include grant writing to leverage other federal and state resources.

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

### Introduction

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

Table 3 Project Information

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

Table 79 – Project Information

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

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

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

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

## AP-38 Project Summary

### Project Summary Information

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

	<b>Target Area</b>	
	<b>Goals Supported</b>	CDBG Planning & Administration
	<b>Needs Addressed</b>	CDBG Administration and Planning
	<b>Funding</b>	CDBG: \$79,315
	<b>Description</b>	Project supports funding for a full time clerk and two stipend positions along with expenses
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>3</b>	<b>Project Name</b>	Code Enforcement
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	Code Enforcement
	<b>Funding</b>	CDBG: \$108,775
	<b>Description</b>	Project funding for a Housing inspector for the core area along with expenses
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	



4	<b>Project Name</b>	Housing Rehabilitation
	<b>Target Area</b>	
	<b>Goals Supported</b>	Increase Affordable Housing Opportunities
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	CDBG: \$283,790
	<b>Description</b>	Project for 10 income eligible activities for housing rehab along with expenses and salary for a part time rehab specialist
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
5	<b>Project Name</b>	HUD Section 108 loan
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	
	<b>Funding</b>	CDBG: \$15,000
	<b>Description</b>	Project to repay every year of a 20 year loan for sidewalks
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	

	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>6</b>	<b>Project Name</b>	DPW/ Sidewalks-Core Area
	<b>Target Area</b>	
	<b>Goals Supported</b>	Improve Public Facilities & Infrastructure
	<b>Needs Addressed</b>	Public Facilities and Infrastructure
	<b>Funding</b>	CDBG: \$30,000
	<b>Description</b>	Project to use program income to do new sidewalks and apron in the core area at the Spanish American center in our core area
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>7</b>	<b>Project Name</b>	LHA/ Fire Project
	<b>Target Area</b>	
	<b>Goals Supported</b>	Improve Public Facilities & Infrastructure Assist the Elderly
	<b>Needs Addressed</b>	Assistance for the Elderly and Frail Elderly
	<b>Funding</b>	CDBG: \$68,000
	<b>Description</b>	Project to support all new fire systems including panels, smokes and heat detectors in the towers downtown for the elderly and Laurie Drive units and Notre Dame units.

	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	

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

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

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

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

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

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

### **Geographic Distribution**

Target Area	Percentage of Funds
Comb & Carriage Core Area	25

**Table 80 - Geographic Distribution**

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

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

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

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

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

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

## **Discussion**

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



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

### **Introduction**

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

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

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

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

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

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

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

#### Resource Allocation

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

#### Policy and Programming

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

#### Land Use and Zoning Policies

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

#### Capacity

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

#### Public Education and Awareness



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

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

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

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

The Massachusetts Childhood Lead Poisoning Prevention Program (CLPPP) was established to prevent, screen, diagnose, and treat lead poisoning. The local CAP agency, Making Opportunity Count (MOC), provides CLPPP funding, case management services, educational outreach and maintains a website that lists Fitchburg and Leominster apartments with a lead inspection. The case management component is a closed referral program for families with children having elevated lead levels. MOC also offers a Healthy Homes Case Management program that provides education and information for families with children under 6 on environmental health and safety issues in their homes.

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

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

with incomes at/below the poverty level.

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

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

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

Leominster's strategy to overcome institutional gaps while addressing priority needs is to supplement funding with additional opportunities as much as possible. The City's full-time Grants Administrator seeks out those additional opportunities. Leominster's Grants Administrator researches and applies for available grant opportunities, targeting grants related to abandoned/foreclosed housing and public services that the CDBG program would have difficulty managing. The Mayor and City Department heads meet regularly to discuss the challenges and opportunities of projects and share insights on maintaining the institutional structure to serve the most in need. Leominster also has an annual allocation process for CDBG activities. Meetings are held on an as-needed basis to collect information about needs, aid in the application process, and report on annual program funding. When applicable, community development staff also participate in outside community meetings and collaborate with Leominster Housing Authority on activities.

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

Public/private entities meet to discuss issues. As Consortium members, Fitchburg and Leominster work on investments and strategies via HOME. Both are North Central Massachusetts CRA Coalition members.

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

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

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

The Family Resource Center offers housing for at-risk of homelessness and identifies mental health services. LUK, Inc. offers programs addressing mental/behavioral health, trauma, addiction, substance abuse, and homelessness. LUK reaches over 12,000 members through youth development, youth substance abuse prevention, trauma response, autism services, and street outreach. Their residential services help youth transition from situations by providing placement, stabilization, case management, and crisis and behavior management.

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

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

## **Discussion**

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

## Program Specific Requirements

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

#### Introduction

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

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

##### Reference 24 CFR 91.220(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
<b>Total Program Income:</b>	<b>0</b>

#### Other CDBG Requirements

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

## **Discussion**

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

## Appendix - Alternate/Local Data Sources

1	<p><b>Data Source Name</b> Maplebrook Survey Data</p> <p><b>List the name of the organization or individual who originated the data set.</b> City</p> <p><b>Provide a brief summary of the data set.</b> Survey conducted by City</p> <p><b>What was the purpose for developing this data set?</b> Detailed analysis of potential target area.</p> <p><b>Provide the year (and optionally month, or month and day) for when the data was collected.</b></p> <p><b>Briefly describe the methodology for the data collection.</b></p> <p><b>Describe the total population from which the sample was taken.</b></p> <p><b>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</b></p>
2	<p><b>Data Source Name</b> Fitchburg/Leominster Community Needs Survey</p> <p><b>List the name of the organization or individual who originated the data set.</b> Cities of Fitchburg and Leominster.</p> <p><b>Provide a brief summary of the data set.</b> Twenty-six people completed a Needs Assessment online survey between March 9 and March 24, 2021. The survey link and QR code were circulated for widespread distribution by the Community Development Department. Hard copies of the survey were available upon request, of which there were nine submissions. Two shelters completed the shelter survey, and eighteen agencies completed the agency/provider survey. Those two surveys were also open from March 9 to March 24, and the link and QR code were circulated to the Community Development Department's compiled provider list. There was collective agreement on the need for street improvement, mental health services, youth programming, code enforcement, and homelessness.</p>

	<p><b>What was the purpose for developing this data set?</b></p> <p>To understand needs, issues and priorities for the Consolidated Plan over the next 5 years.</p>
	<p><b>Provide the year (and optionally month, or month and day) for when the data was collected.</b></p> <p>2021</p>
	<p><b>Briefly describe the methodology for the data collection.</b></p> <p>Online and mailer survey options, and paper versions available at City Hall. Also translated into Spanish.</p>
	<p><b>Describe the total population from which the sample was taken.</b></p> <p>Details of the population are in the PR-15 Citizen Participation section of this Consolidated Plan and attached as an Appendix.</p>
	<p><b>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</b></p> <p>Details of the demographics/characteristics are in the PR-15 Citizen Participation section of this Consolidated Plan and attached as an Appendix.</p>
<b>3</b>	<p><b>Data Source Name</b></p> <p>Fitchburg/Leominster 5-Yr Con Plan Agency Survey</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>Cities of Fitchburg and Leominster.</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>Twenty-six people completed a Needs Assessment online survey between March 9 and March 24, 2021. The survey link and QR code were circulated for widespread distribution by the Community Development Department. Hard copies of the survey were available upon request, of which there were nine submissions. Two shelters completed the shelter survey, and eighteen agencies completed the agency/provider survey. Those two surveys were also open from March 9 to March 24, and the link and QR code were circulated to the Community Development Department's compiled provider list. There was collective agreement on the need for street improvement, mental health services, youth programming, code enforcement, and homelessness prevention in each survey.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>To understand City needs and develop Con Plan and one-year priorities for the next five years.</p>
	<p><b>Provide the year (and optionally month, or month and day) for when the data was collected.</b></p> <p>2021.</p>
	<p><b>Briefly describe the methodology for the data collection.</b></p> <p>Online and email distribution, also mentioned in public meetings throughout the process.</p>



	<p><b>Describe the total population from which the sample was taken.</b></p> <p>Housing and human service staff and local/regional providers.</p>
	<p><b>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</b></p> <p>Details attached to PR-15 section of the Consolidated Plan and uploaded in the Appendix.</p>
4	<p><b>Data Source Name</b></p> <p>Fitchburg/Leominster 5-Yr Con Plan Shelter Survey</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>Cities of Fitchburg and Leominster.</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>Twenty-six people completed a Needs Assessment online survey between March 9 and March 24, 2021. The survey link and QR code were circulated for widespread distribution by the Community Development Department. Hard copies of the survey were available upon request, of which there were nine submissions. Two shelters completed the shelter survey, and eighteen agencies completed the agency/provider survey. Those two surveys were also open from March 9 to March 24, and the link and QR code were circulated to the Community Development Department's compiled provider list. There was collective agreement on the need for street improvement, mental health services, youth programming, code enforcement, and homelessness prevention in each survey.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>To understand City needs and develop Con Plan and one-year priorities for the next five years.</p>
	<p><b>Provide the year (and optionally month, or month and day) for when the data was collected.</b></p> <p>2021.</p>
	<p><b>Briefly describe the methodology for the data collection.</b></p> <p>Online and email distribution, also mentioned in public meetings throughout the process.</p>
	<p><b>Describe the total population from which the sample was taken.</b></p> <p>Emergency shelter staff and local/regional homeless providers.</p>
	<p><b>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</b></p> <p>Details attached to PR-15 section of the Consolidated Plan and uploaded in the Appendix.</p>
5	<p><b>Data Source Name</b></p> <p>ES202 Data</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>MA Department of Unemployment Assistance, Economic Research Department</p>

	<p><b>Provide a brief summary of the data set.</b></p> <p>State figures for the number of jobs to complete the "Business Activity" Table.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>To to complete the "Business Activity" Table accurately.</p>
	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>It is industry and economic data for the City of Leominster.</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>Most current figures at the time of plan drafting -2021.</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Complete</p>