

Town of Brookline

FY 2019

Annual Action Plan



Prepared by:

Department of Planning and Community Development

July 2019

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Executive Summary

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

1. Introduction

The FY19 (FFY 2018) Annual Action Plan (AAP) reflects a planning process that relied on citizen input to determine the Community Development Block Grant (CDBG) allocations for the fiscal year starting July 1, 2018 and ending June 30, 2019. As a CDBG entitlement community, Brookline receives an annual CDBG allocation. Brookline is also a Participating Jurisdiction of the WestMetro HOME Consortium and receives an annual HOME allocation to support the preservation and creation of affordable housing. The City of Newton is the lead entity for the HOME Consortium

2. Summarize the objectives and outcomes identified in the Plan

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

Annual goals and objectives for FY 2019 can be found at AP-20. The Town's housing goals are to preserve and create rental housing in Brookline. The outcomes are housing affordability, availability and accessibility, while the objectives are the provision of decent affordable housing and the creation of suitable living environments. Additionally, Brookline continues to fund critical public services, with the goal of providing support for a wide array of services that primarily benefit low- and moderate-income households.

Finally, the Town will fund acquisition costs for a major public facilities project which, when completed, will meet the goals of creating a suitable living environment and providing accessibility through the inclusion of pedestrian crossings across a heavily used roadway in an area adjacent to where many of the Town's low- and moderate-income residents live.

3. Evaluation of past performance

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

As in past years, the Town has continued to adapt to federally-mandated regulatory changes that seek to streamline administrative requirements, cost principles, and audit requirements for recipients of federal funding. As a result, the Town has been able to improve overall administrative delivery and program performance from the subrecipient level.

Regulatory changes, along with the ever-present possibility of grant reduction, have required the Town to determine where unfulfilled needs exist and how best to allocate funding to programs that effectively meet the goals and objectives identified in the FY2016-2020 Consolidated Plan. Administrative staff continually encourage agencies receiving CDBG funding to forge new partnerships and to better leverage resources for the programs and services they provide. Grant recipients have continually and successfully sought funding from a number of sources to support their programs.

Following the close of the fiscal year, the Town of Brookline completes its Consolidated Annual Performance Evaluation Report (CAPER) to convey to HUD how prior year CDBG funds were expended. The CAPER describes the expenditures and accomplishments of the prior year, and evaluates the progress that the Town and its grantees made in advancing the priorities identified in the prior year's Annual Action Plan.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The Department of Planning and Community Development worked closely with the Town's CDBG Advisory Committee (charged with making CDBG funding recommendations) and the Select Board in the development of the FY 2019 Annual Action Plan. Collaboration included consultation with the Housing Advisory Board, Brookline Housing Authority, Brookline Community Mental Health Center, Brookline Diversity, Inclusion, and Community Relations Department, Council on Aging, Brookline Foundation, Pine Street Inn, West Metro HOME Consortium, personnel from the former Brookline-Newton-Waltham-Watertown Continuum of Care, MA Department of Housing and Community Development, social service agencies and other special needs providers.

In addition to the aforementioned consultation with agencies and Town departments, the CDBG Advisory Committee held two public meetings to determine the allocation of CDBG funds. Meeting notices were placed in the Brookline Tab, the Town Clerk's Office, the Brookline Public Library and at Brookline Housing Authority Developments town-wide. Notices were also posted on the Town's website and were distributed widely using e-mail lists and list serves to notify neighborhood groups, non-profits, Town Meeting members and past participating members of the CoC.

CDBG Advisory Committee meetings were held on February 28, 2018 and March 1, 2018 in Brookline Town Hall. Notification of the 30 day comment period on the Annual Action Plan was posted in the May 17, 2018 edition of the Brookline Tab. The comment period closed on June 16, 2018. No comments were received from the public during this period (to be confirmed prior to final version of plan). The

Select Board held a public hearing on June 19, 2018 to discuss the Town's entitlement budget and approval of the Annual Action Plan and its submission to HUD. No comments were received from the public during the Board's public hearing.

Persons with disabilities who need either auxiliary aids and services for effective communication, written materials in alternative formats, or reasonable modifications in policies and procedures in order to access programs and activities of the Town of Brookline are invited to make their needs and preferences known to the Town's ADA Coordinator. All meeting notices posted on the Town web site and the Legal Notice posted in the *Brookline Tab* provide contact information to the Town's Office of Diversity, Inclusion and Community Relations.

5. Summary of public comments

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

To date, the only comments received by the CDBG Advisory Committee occurred during the Committee's public process to review competitive RFP submissions for grant funding from potential recipients. The Committee expressed its opinions of programs and projects related to the scope, viability, and the extent of assistance to populations in need. The Committee completes its process by deliberating on funding recommendations for the Brookline Select Board, who voted to approve the Town's Annual Action Plan and its submission to HUD at its June 19, 2018 Public Hearing.

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

During the development of the Annual Action Plan, there were no comments or views from the public that were not accepted as part of the citizen participation process. As required by protocol, should such comments be received by the Town they would immediately be addressed in writing and submitted to the party making the comment

7. Summary

The Town of Brookline provided citizens, public agencies, and other interested parties with reasonable and timely access to meetings/hearings related to the development of this FFY 2018 (FY2019) Annual Action Plan. Meetings were held at locations accessible to persons with disabilities, and provisions are made at all meeting venues for people with disabilities and for persons who do not speak English, if requested. No requests were made during any public meetings or hearings by individuals with disabilities or by persons requiring translation services.

Public hearings allow time for citizen comment, and the Town's outreach is targeted to solicit input from low- and moderate-income residents. Public hearings were advertised by publishing hearing notices, which include date, time, location, and subject matter of the hearing(s) in the legal sections of the Brookline Tab. Public hearing notices are posted on the Town Calendar on the Town of Brookline website. In addition to advertising the venue for public meetings and hearings, notices also invite written public comments, when applicable.

The Town's Request for Proposals and Guidelines for the use of CDBG funding were posted on the Town's website to promote easier access for potential applicants and for review by the community at large.

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

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

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	BROOKLINE	Department of Planning and Community Development
CDBG Administrator	BROOKLINE	

Table 1 – Responsible Agencies

Narrative

The Community Planning Division of the Brookline Planning and Community Development Department is the lead agency responsible for oversight of the administrative and fiscal management aspects of the CDBG entitlement grant. The Division works to enhance the lives of low- and moderate-income residents within the community by facilitating and overseeing programs focused on the preservation and development of affordable housing, community and public facilities, economic development, and public services.

In addition, Division staff participate in the HOME Investment Partnerships Program (HOME) through the WestMetro HOME Consortium. The Consortium is comprised of the towns of Bedford, Belmont, Brookline, Concord, Framingham, Lexington, Natick, Needham, Sudbury, Watertown, and Wayland, and the cities of Newton and Waltham.

Consolidated Plan Public Contact Information

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

1. Introduction

The FY 19 Annual Action Plan reflects citizen collaboration during both the consolidated planning process and during the annual process for determining the Community Development Block Grant (CDBG) allocations for the fiscal year beginning July 1, 2018 and ending June 30, 2019. Although the Town receives CDBG funding independently, the City of Newton is the lead agency for the West Metro HOME Consortium. The Town is one of thirteen communities receiving a HOME funding allocation. Brookline was a member of the Brookline-Newton-Waltham-Watertown Homelessness Continuum of Care (CoC), a regional planning body that coordinates housing and services funding for homeless families and individuals. While the consortium adopted a Ten Year Plan to End Homelessness and participated with other Massachusetts CoCs to address the needs of the homeless, the CoC approved a merger with the Balance of State in December 2016. Balance of State means the four communities will become part of a larger CoC managed by the Massachusetts Department of Housing and Community Development (MA DHCD).

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(l)).

- The Brookline Community Mental Health Center (BCMHC) works in collaboration with the Brookline Housing Authority (BHA) to provide case management services for many of its residents, which include assisting those who are homeless.
- Many of the Town's affordable housing projects are owned and operated by non-profits who have case management staff to assist residents with health, mental health, and myriad services vital to their clientele. These agencies include Pine Street Inn, Hebrew Senior Life, HEARTH, the Brookline Improvement Coalition, and housing operated by the State's Department of Mental Health or Department of Developmental Services.
- Case managers at the Brookline Health Department's Human Services division work with residents to assist in accessing emergency shelter, SNAP benefits, health insurance and medical care, and fuel assistance.
- Stakeholders whose services benefit populations that are homeless or about to become homeless are encouraged to participate in MA DHCD's CoC. Representatives from the Town's CDBG funded activities and will continue to be involved in the process at the local and state level via MA DHCD.
- Stakeholders provide myriad services to all populations housed in public housing developments; these agencies work with the BHA to provide needed services on site to ensure access and convenience for residents.

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.

As noted, the Brookline-Newton-Waltham-Watertown (BNWW) Continuum of Care (CoC), previously lead by the City of Newton, merged with the Massachusetts Balance of State in December of 2016. The Balance of State (BoS), under the supervision of the MA Department of Housing and Community Development (MA DHCD), implements the continuum's homelessness strategy across 80 member communities. This encompasses the administration of federal and state resources, submission of the Consolidated Application for McKinney-Vento funds, undertaking regional needs assessments and oversight of projects addressing homelessness assistance and prevention. Although BNWW is no longer its own CoC, quarterly meetings will be held in FY 19 to keep members abreast of needs and issues impacting homeless and at-risk individuals and families and to maintain regional connectivity with service providers. HUD awarded the BoS a total of \$12,777,016 in FFY17 CoC funding, an almost 8% increase from the prior year. This is in part due to the recent merger of the BNWW CoC with the BoS CoC.

Emergency Solutions Grant (ESG) funds are administered by the City of Newton and awarded to local providers through a competitive Request for Proposals (RFP), providing shelter operations/services, homelessness prevention, and rapid rehousing services throughout the Brookline-Newton-Waltham-Watertown region. Newton Staff released a FY19 (FFY18) RFP on January 24, 2018 to allow for a more timely identification of projects for the Action Plan and the execution of programs parallel to the start of the fiscal year. The FY19 ESG allocation will support 8 projects across 5 sub-grantee agencies, including the Brookline Community Mental Health Center for its Rapid Re-Housing Program.

Additionally, a robust ESG program that appropriately targets homeless prevention and rapid rehousing programs will provide vulnerable individuals and families with critical resources to avoid crisis and stabilize. ESG recipients and CoC providers work closely with the MA Department of Children and Families (DCF) and the MA Department of Mental Health (DMH) on discharge policies for youth and clients of DMH. The Brookline Community Mental Health Center develops individualized service plans and transition plans for Transition to Independent Living Program participants (ages 16-22). Youth are routinely discharged to reunify with their families or to another housing option if the youth's age permits or if reunification is not possible.

The Town recognizes the need to create and preserve permanent affordable housing for many populations within the Town, including the homeless. Guidance from the U.S. Interagency Council on Homelessness is in line with Town goals to ensure that the homeless and at risk populations have housing stability, economic security and access to services for improved health. Expanding and preserving existing rental units as affordable are two of the Town's affordable housing goals.

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

Although MA DHCD is the overseer of ESG funds, the City of Newton administers the use of ESG funds at the regional level. The Town coordinates with past BNWW CoC members related to ongoing projects, activities and funding priorities in order to continue advocacy for agencies that serve the local municipalities as well as the region.

2. Agencies, groups, organizations and others who participated in the process and consultations

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Brookline Housing Advisory Board
	Agency/Group/Organization Type	Housing Other government - Local Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Housing Policy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Brookline Housing Advisory Board held a public meeting to review and comment upon the Town's Housing priorities, including for federal sources for the Town on Brookline and City of Newton's FY 2019 Annual Action Plans. The anticipated outcome is prioritization of HOME, CDBG and other Town-managed resources.
2	Agency/Group/Organization	Brookline Housing Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Brookline Housing Authority was consulted about public housing needs, including capital needs for state-owned public housing in FY 2019 and a multi-year Strategic Preservation Initiative. This information helps inform the Town's prioritization and coordination of resources for new projects and/or preservation of affordable units.
3	Agency/Group/Organization	Brookline Health Department
	Agency/Group/Organization Type	Health Agency Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Health Related to Housing

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Health Department works with disabled persons, the homeless, and persons afflicted by substance abuse. The Dept. provides feedback related to housing needs. The outcome is better health education to the public in all areas affecting public health/housing.
4	Agency/Group/Organization	Brookline Diversity, Inclusion, and Community Relations Dept.
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Fair Housing Issues
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Department works with the Select Board, HAB and Commission on issues of fair housing, diversity, and inclusion. Interdepartmental interaction ensures input on housing, diversity and accessibility; outcome is creation and dissemination of educational materials to foster a more diverse and inclusive community.
5	Agency/Group/Organization	BROOKLINE COMMUNITY MENTAL HEALTH CENTER
	Agency/Group/Organization Type	Services-Children Services-Victims of Domestic Violence Services-homeless Health Agency
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The BCMHC provides homelessness prevention services and comprehensive mental health services to citizens of the town. BCMHC was consulted for needs assessment. BCMHC provides on-going case management for those experiencing housing and mental health issues. Outcome is improved delivery of mental health services to affected groups.

6	Agency/Group/Organization	Brookline Council on Aging
	Agency/Group/Organization Type	Services-Elderly Persons Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Elder Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Council on Aging provides a wide variety of services to seniors and informs the Town's understanding of housing and service needs of Brookline seniors. The anticipated outcome of consultation is improved coordination of services for seniors.
7	Agency/Group/Organization	CENTER COMMUNITIES OF BROOKLINE
	Agency/Group/Organization Type	Housing Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Elder Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This agency provides senior housing to many residents. The anticipated outcome is information related to the housing and service needs of the elderly.
8	Agency/Group/Organization	Pine Street Inn, Inc.
	Agency/Group/Organization Type	Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	PSI provides significant housing and services to homeless individuals within the community. The anticipated outcome of consultation is improved coordination and to inform the housing and service needs of the homeless.

9	Agency/Group/Organization	Brookline Community Foundation
	Agency/Group/Organization Type	Civic Leaders Foundation
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Community Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	BCF was consulted to provide information on community housing needs for the Town. Anticipated outcome is better understanding of housing and social services needs across different demographic groups within the community.
10	Agency/Group/Organization	CDBG Advisory Committee
	Agency/Group/Organization Type	Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Community Development - Non-Housing
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The CDBG Advisory Committee held a series of meetings to review requests for CDBG funds and to formulate a funding recommendation to the Brookline Select Board. The anticipated outcome is citizen-led prioritization and recommendation of how FY 2019 CDBG funds should be allocated.
11	Agency/Group/Organization	City of Newton Planning and Development Department
	Agency/Group/Organization Type	Other government - Local

What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Grant Administration
Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City of Newton was the Participating Jurisdiction for the WestMetro HOME consortium, and continues its coordination with the BNWW CoC agencies and the BoS related to homeless needs. The anticipated outcomes of the consultation are: cohesive administration of HOME funds; continued advocacy related to homelessness grants; greater outreach to stakeholders to solicit participation; regional administration of ESG funds; and to meet housing and homelessness needs among BoS communities.

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

There were no agency types not consulted.

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	City of Newton/MA DHCD	CoC members and stakeholders will discuss how to advocate for local agencies as part of the BoS process to ensure that the needs of the homeless are met at the local level.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Understanding Brookline: A Report on Poverty	Brookline Community Foundation	This report informs priorities and strategies developed in the AAP with respect to the needs of the Town's low- and moderate-income residents.
Housing Production Plan	Brookline Housing Advisory Board/Planning Board	The plan provides information on housing needs and provides goals and implementation strategies to meet community housing needs.
Brookline Comprehensive Plan	Town of Brookline Planning and Community Development Office	The Comprehensive Plan advocates for creating new housing opportunities and preserving the Town's existing housing supply.
BHA 5-Yr Capital Plan	Brookline Housing Authority	The BHA Capital Plan puts forth a coordinated plan to address capital needs of the BHA's housing developments.
MetroWest Regional Fair Housing Plan FFYs 15-FFY20	City of Newton/MAPC/Metro West	This regional plan, prepared in conjunction with Metropolitan Area Planning Council, builds on previous planning efforts to affirmatively further fair housing, facilitate access to housing choice and opportunity and address barriers to fair housing.
FY16-20 Consolidated Plan	Town of Brookline - Dept. of Planning and Community Development	Informs the Town's community development and housing goals through 2020, including the goals in the FY19 AAP.
Brookline Strategic Asset Plan - Major Parcels Stu	Town of Brookline - Dept. of Planning and Community Development	Assess redevelopment opportunities of Town parcels. Perform community visioning and planning for respective neighborhoods.
Route 9 Visioning Study	Town of Brookline - Dept. of Planning and Community Development and MIT	To develop a vision for the Route 9 East corridor near Brookline Village.
Open Space Plan	Town of Brookline	Guides strategies to creating suitable living environments - such as improvements to features to allow enhanced access to open spaces for the disabled

Table 3 - Other local / regional / federal planning efforts

Narrative

AP-12 Participation - 91.401, 91.105, 91.200(c)

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

On February 28, 2018 and March 1, 2018 two public meetings were held by the Town's citizen advisory group (CDBG Advisory Committee) whose charge is to make funding recommendations to the Brookline Select Board on the CDBG entitlement grant. The meetings followed a competitive RFP process and funding deliberations. These meetings provided citizens with an opportunity to participate in the process to establish the Town's Annual Action Plan (AAP). Thereafter, the Select Board reviewed and discussed the CDBG Advisory Committee's recommendations and provided an opportunity for additional public comment before voting on the AAP and CDBG budget approval at a public hearing on May 8, 2018. Following the approval by the Select Board, the AAP is submitted to HUD.

The Housing Division provides professional staffing for the Brookline Housing Advisory Board (HAB), which holds monthly meetings to review all affordable housing projects being undertaken or considered by the Town. All final funding commitments for affordable housing projects are approved by the Select Board, who act on recommendations from the HAB and hold public hearings/meetings for public input. Content related to the FY18 AAP was discussed at the Housing Advisory Board meeting on February 16, 2018. All HAB meetings are open to the public and advertised via the Town's web site and blog, to all interested parties, including all Town Meeting members.

In calendar year 2017-2018, Planning Department completed a Strategic Asset Plan (SAP), which included a Major Parcels Study (MPS) of land within the Town of Brookline. Part of the Town's rationale to undertake a Major Parcels Study is to explore options that enable the Town to act on land opportunities as they arise. These options include potential zoning changes, new planning initiatives, public-private partnerships, changes in policy as well as possible programming and financing mechanisms. These options will require further study by the Town in consultation with the community. They offer myriad ways to collaborate with major parcel owners to achieve outcomes that support Brookline's long-term vision for the future. It is expected that MPS will help the Town build relationships with major parcel owners and will support planning for long-term needs, including affordable housing.

Longer-term goal setting is the focus of the Town's 5 Year Consolidated Plan (2016-2020); FY 2019 represents year 4 of the Con Plan. The goals that were set in the Con Plan are reflected in this action plan. Should goals need to be refined over time, the Town will take the necessary

actions to incorporate appropriate or need-based changes to the plan, following its Citizen Participation plan when appropriate. All goals included in FY 2019 were previously approved by HUD as part of its acceptance of the Town's 2016-2020 Consolidated Plan.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Notification to citizens and interested parties on the availability of competitive Request for Proposals for FY 2019 CDBG Grant.	N/A - interested parties apply for grant funding via Competitive RFP		

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	Internet Outreach	Minorities Persons with disabilities Non-targeted/broad community aLL iNCOME gROUPS FROM 9-80%	Another means of notification to citizens of the Town, interested parties, boards and commissions, Town meeting members of the availability of FY 2019 RFP.	N/A - Goal is to solicit interest from applicants for funding or queries on eligibility of possible activity prior to applying.		
3	Public Meeting	Non-targeted/broad community	Meeting of the Housing Advisory Board to discuss use and priorities for use of federal and local funds. Meeting included discussion of supporting a multi-year Strategic Preservation Initiative to be undertaken by the Brookline Housing Authority.			

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 Meeting	Minorities Non-targeted/broad community Residents of Public and Assisted Housing	Attendees at the first public meet to review RFP submissions. Others in attendance were staff and applicants for funding.	Attendees gave presentations for requests for FY 2019 funding.		
5	Public Meeting	Minorities Residents of Public and Assisted Housing Applicants who applied via RFP	Second meeting held in response to Requests For Proposals for FY 2019 funding. Over the two meetings the citizen group charged with making recommendations on the grant reviewed twelve applications for funding.	Applicants reviewed requests with the committee.		

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 Meeting	Members of the Advisory Group	CDBG Advisory Committee recommendations were discussed at a public meeting. Information related to merit scoring and eligibility information was reviewed by staff. Process concludes with recommendation for the FY 2019 entitlement grant.	Result is funding recommendation made by CDBG Advisory Committee to Brookline Select Board for use of entitlement grant		
7	Public Hearing	Non-targeted/broad community	The Brookline Select Board votes on the CDBG Advisory Committee's recommendations and approve submission of the Town's AAP to HUD.			

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)
8	Public Meeting	Non-targeted/broad community	The Town hosted Community meetings related to the creation of a Strategic Asset Plan and Major Parcel Study			

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

CDBG and HOME funding will remain level funded for FFY 2018 (Town FY 2019) funding. If, after the formula-based division of the annual appropriation among grantees, there is any diminution in funding for Town-sponsored projects, the Town will revisit these projects to ensure that goals set forth are achievable.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,411,176	3,997	183,384	1,598,557	0	CDBG allocation for FY 18; prior year funds and projected program and revolving loan income to be reallocated as needed. Will appropriate \$183,381.40 in unallocated prior year funding, program income and revolving loan income received in FY 18 for affordable housing and public facilities

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: \$		
Competitive McKinney-Vento Homeless Assistance Act	public - federal	Other	0	0	0	0	0	
Housing Trust Fund	public - local	Housing	1,773,926	0	0	1,773,926	0	Brookline Housing Trust commitment to the construction of 62 units of elder housing.
Other	public - federal	Acquisition Admin and Planning Housing	283,402	0	0	283,402	0	Projected HOME allocation to the Town of Brookline from the WestMetro HOME consortium.
Other	public - state	Public Improvements	0	0	0	0	0	

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: \$		
Other	public - local	Acquisition Public Improvements	1,250,000	0	0	1,250,000	0	To acquire all temporary and permanent easements needed for the construction of the Gateway East project, and work with landowners and Town Counsel to establish fair compensation for permanent rights and construction easements. To secure all right-of-way needed for the construction of the Gateway East project. To provide construction match to MassDOT.
Other	public - local	Admin and Planning	132,952	0	0	132,952	0	Balance of salaries paid by the Town to facilitate administration and planning activities.
Other	public - local	Housing Other	0	0	0	0	0	
Other	public - local	Public Services	1,067,067	0	0	1,067,067	0	Public services receive other public (federal and state) and private funding. As part of RFP, the Town strongly encourages all potential recipients to leverage funds. Leveraging capacity is weighted strongly in the Town's Request for Proposals for CDBG funding.

Table 5 - Expected Resources – Priority Table

Annual Action Plan
2018

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

Leveraging additional resources to support affordable housing projects and programs remains a priority for the Town. HOME funds are matched by a number of local, state, and private funding sources in all new construction and rehabilitation projects for affordable housing. These include by the Brookline Housing Trust, a local fund capitalized by a combination of developer linkage and direct appropriations to the Town's general fund and/or free cash; local CDBG funds; grants from the Massachusetts Department of Housing and Community Development; grants from the Federal Home Loan Bank; Federal and State Low Income Housing Tax Credits; and private debt from quasi-public agencies like the Massachusetts Housing Partnership and private banks. The Town anticipates that new affordable housing development will leverage funding from these sources.

With respect to new housing development, in FY19, the Town of Brookline plans to include approximately \$265,402 in HOME funding (in addition to anticipated Program Income) as part of an overall Town of Brookline commitment of \$2.5 million to Jewish Community Housing for the Elderly (JCHE) for a 62-unit affordable senior housing project to be located at Temple Kehillath Israel in Coolidge Corner. Additional funding from the Town will come from the Brookline Housing Trust Fund as well as CDBG entitlement funds. Currently JCHE is seeking state subsidies and low-income housing tax credits from the state's Department of Housing and Community Development as well as private debt, in order to complete this \$25 million project. The project received its Ch. 40B Comprehensive Permit in March, 2018 and is expected to close on construction financing in fall/winter of 2018.

Inclusionary Zoning projects require a 15% affordable unit set aside as part of the process for receiving a special permit. Exceptions exist for developments with 6-15 units, where the developer may elect to make a cash payment to the Brookline Housing Trust. When projects are developed under the Mass. General Law Chapter 40B, 20-25% of all units must be affordable in exchange for receiving a comprehensive permit from the Brookline Zoning Board of Appeals. In these projects, developers receive financing through state agencies. In the case of the JCHE project, a friendly 40B with 100% affordability, Housing Trust and other Town-controlled subsidies are committed to the project, as noted above.

With respect to public service leveraging, the creative and innovative use of CDBG dollars by local agencies continues to leverage greater than three dollars for every CDBG dollar invested. Public services leverage dollars from many sources, including private foundations, other state and

federal sources and from private donors.

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

A Select Board-appointed committee has been convened to determine the feasibility of building affordable housing on Town-owned parking lots. While discussions are exploratory at this point, the Committee's work follows the recommendation of the recently-completed SAP/Major Parcels Study and Housing Production Plan, which states that the Town should explore the feasibility of using Town-owned land for affordable housing development

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	Affordable Housing - Rehab Rental	2014	2017	Affordable Housing		Affordable Housing - Rental	CDBG: \$79,921	Rental units rehabilitated: 239 Household Housing Unit
2	Affordable Housing- New	2016	2020	Affordable Housing		Affordable Housing - New Units	CDBG: \$175,000 Housing Trust Fund: \$1,773,926 HOME: \$265,402	Rental units constructed: 62 Household Housing Unit
3	Public Services	2016	2020	Non-Homeless Special Needs		Public Services	CDBG: \$202,940 Public Service Agencies: \$1,067,067	Public service activities other than Low/Moderate Income Housing Benefit: 962 Persons Assisted
4	Public Facilities/Public Improvements	2016	2020	Non-Housing Community Development		Public Facilities/ Infrastructure	CDBG: \$415,564 Town: \$1,250,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 3000 Persons Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Affordable Housing - Rehab Rental
	Goal Description	<p>In FY19, CDBG will be used to rehabilitate exterior stairs and landings located at the High Street Veterans Development; installing security cameras at the Col. Floyd Apartment and; improving the playground at the High Street Veterans community playground.</p> <p>In FY19, Brookline anticipates the completion of the Trustman Apartments renovation project, which was bid in FY 17 but is still underway. HOME funds will continue to be utilized to assist with the moderate rehabilitation of the 86-unit occupied state-financed public housing development. Nineteen units in the development will be designated as HOME assisted.</p> <p>In FY19 (FFY18), the Town of Brookline will begin to work with the Brookline Housing Authority to begin a multi-year Strategic Preservation Initiative. This project will take advantage of HUD's Rental Assistance Demonstration Program as well as federal and state tax credits and state and local subsidies to rehabilitate and preserve nearly 500 units of affordable public housing in six different properties.</p>
2	Goal Name	Affordable Housing- New
	Goal Description	<p>In FY19 (FFY18), Brookline will focus its affordable housing resources on the development of a 62-unit affordable senior housing project in Coolidge Corner. This project is being undertaken by Jewish Community Housing for the Elderly (JCHE). JCHE is a long-standing provider of quality, affordable senior housing and services in the Greater Boston area. This project represents an excellent opportunity to expand Brookline's supply of much-needed affordable senior housing and will be located in an ideal location, given the site's access to public transportation, retail shopping, and other services.</p>
3	Goal Name	Public Services
	Goal Description	<p>Public Service grants will fund 7 programs through sub-grantee agencies and Town departments in FFY 18 (FY19). These programs directly benefit low- moderate-income residents and will provide a critical network of support programs to assist vulnerable individuals and families.</p> <p>Public service activities other than Low/Moderate Income Housing Benefit: 1,205 Persons Assisted</p>

4	Goal Name	Public Facilities/Public Improvements
	Goal Description	<p>Support for improvements to public facilities and infrastructure that benefits low- to moderate-income residents of the town, in and around eligible census tract areas.</p> <p>In FY18 (FFY17), the Town of Brookline submitted 100% design plans for the Gateway East project to the Massachusetts Dept. of Transportation for approval. Prior to bidding the project for construction in FY19 (FFY18) the Town must acquire all temporary and permanent easements for the project from abutters and provide MassDOT a construction match. Town and CDBG funds will be used for direct compensation to abutters for easements required for construction; other local dollars will be used to partially fund easement costs and construction.</p>

AP-35 Projects - 91.420, 91.220(d)

Introduction

The Town of Brookline makes its funding allocation decisions based on proposals received as part of a competitive Request for Proposals (RFP) process. Through this process, funds are awarded to eligible activities that support the goals and address the priority needs articulated as part of the Consolidated Plan. The expected resources cited in the RFP are based on assumptions about future funding levels and are contingent upon the Town's receipt of sufficient funds

#	Project Name
1	CD Administration
2	Comprehensive Planning
3	BHA Resident Security, Outdoor Spaces & Capital Projects
4	Housing Division
5	Affordable Housing
6	BCMHC Adolescent Outreach Program
7	BCMHC Comprehensive Services
8	Brookline Elder Taxi System
9	Next Steps Program
10	Parent Child Home Program
11	Brookline ESOL Program
12	Work Connections for Youth
13	Gateway East Right of Way Acquisition

Table 7 – Project Information

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

The Town's FY2016-2020 Consolidated Plan identified the goals and objectives for the use of CDBG and other funding anticipated to be received by the Town. Activities are considered for funding based on meeting these goals and objectives. The primary obstacle to addressing underserved needs is a lack of predictable funding needed to launch and sustain programs. Since CDBG funds are necessary to leverage other grant funds and private dollars, limited resources often means that prospective CDBG recipients, all of whom provide meaningful services or programs, compete for the same diminished pools of funding. The funding need for these programs is often greater than what can be provided through the entitlement, as evidenced by yearly RFP responses where applicants consistently request funding at a level that is considerably higher than what is allocated to the Town as part of its entitlement. Limited funding requires applicants to prioritize their programs and/or defer other worthy projects/activities to later years, if they are pursued at all.

AP-38 Project Summary
Project Summary Information

1	Project Name	CD Administration
	Target Area	
	Goals Supported	Affordable Housing - Rehab Rental Affordable Housing- New
	Needs Addressed	Affordable Housing - Rental Affordable Housing - New Units Affordable Housing - Rehab Existing Fair Housing Public Services
	Funding	CDBG: \$226,318 Town: \$49,974
	Description	Grant oversight is required to effectively carry out the CDBG entitlement regulations. This activity is required of funded entitlements to ensure that program management and the administration of the grant is in conformance with regulations promulgated for the CDBG entitlement. Funding will be used to pay reasonable program administration costs and carrying charges related to the planning and execution of community development projects, assisted in full or partially by CDBG funds.
	Target Date	7/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	All participants of programs served under the grant are qualified as low- and moderate-income persons. Administration of grant is presumed to benefit low- and moderate-income persons.
	Location Description	333 Washington Street, Brookline, MA 02445
	Planned Activities	Grant and Fiscal Management of Entitlement Grant
2	Project Name	Comprehensive Planning
	Target Area	
	Goals Supported	Affordable Housing - Rehab Rental Affordable Housing- New Public Facilities/Public Improvements
	Needs Addressed	Affordable Housing - Rental Affordable Housing - New Units Fair Housing Public Services

	Funding	CDBG: \$45,902 Town: \$82,978
	Description	Staff will work on facilitating current public facilities activity that ties into Comprehensive Plan, Five Year Consolidated Plan, which pertain to major planning projects underway.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	Estimated that 3,000 households will benefit, ranging from extremely-low to moderate-income.
	Location Description	333.Washington Street, Brookline, ma 02445
	Planned Activities	Gateway East - Right-of-Way Acquisition Gateway East - project management for permitting and construction
3	Project Name	BHA Resident Security, Outdoor Spaces & Capital Projects
	Target Area	
	Goals Supported	Affordable Housing - Rehab Rental
	Needs Addressed	Affordable Housing - Rental Affordable Housing - Rehab Existing
	Funding	CDBG: \$79,921
	Description	CDBG funds will be used for capital improvements to 2 Brookline Housing Authority Developments
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	200 housing units will benefit, for a total of approximately 623 residents.
	Location Description	High Street Veterans Development Colonel Floyd Development
	Planned Activities	Funding will cover improvements at three Brookline Housing Authority developments. CDBG funds will be used for exterior stairs at the High Street development, installing security cameras at Colonel Floyd Apartments and for work at the High Street Veterans Development community playground.

4	Project Name	Housing Division
	Target Area	
	Goals Supported	Affordable Housing - Rehab Rental Affordable Housing- New
	Needs Addressed	Affordable Housing - Rental Affordable Housing - New Units Affordable Housing - Rehab Existing Affordable Housing - Acquisition of Existing Units Fair Housing
	Funding	CDBG: \$265,531 HOME: \$18,000
	Description	The program consists of supporting staff of the Housing Division who help to create and preserve affordable housing within the Town of Brookline.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	148 households, both family and seniors, will benefit from the proposed activities.
	Location Description	7-33 Egmont Street 370-384 Harvard Street Kent/Station Street Parking lot BHA Developments – Town-wide
	Planned Activities	Staff will work to move the JCHE project from permitting to construction, as well as the pursuit of new housing opportunities on Town-owned land and the preservation of rental housing. Staff will assist to administer units created through inclusionary zoning and 40B - which includes 20-25% affordable units for households serving less than 80% of AMI. Staff will work with the BHA to complete capital improvements at its High Street Veterans, Colonel Floyd and Trustman Developments, utilizing HOME funds and CDBG funds Staff will assist with the BHA's multi-year Strategic Preservation Initiative to take advantage of HUD's Rental Assistance Demonstration Program as well as federal and state tax credits and state and local subsidies to rehabilitate and preserve nearly 500 units of affordable public housing in six different properties.

5	Project Name	Affordable Housing
	Target Area	
	Goals Supported	Affordable Housing - Rehab Rental Affordable Housing- New
	Needs Addressed	Affordable Housing - Rental Affordable Housing - New Units Fair Housing
	Funding	CDBG: \$175,000 Housing Trust Fund: \$1,773,926 HOME: \$265,402 Town: \$132,380
	Description	Funds will be used to develop and preserve new rental housing opportunities for extremely-low, low-, and moderate-income households.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	Greater than 500 households, both family and seniors, will benefit from the proposed activities.
	Location Description	220 High Street 190 Harvard Street 150 Amory Street
Planned Activities		
6	Project Name	BCMHC Adolescent Outreach Program
	Target Area	
	Goals Supported	
	Needs Addressed	Homelessness Prevention Public Services
	Funding	CDBG: \$42,750 Public Service Agencies: \$465,086

	Description	CDBG funds will be used to support income eligible adolescents and family members who receive direct care through the counseling component of the program. The program provides counseling, crisis-intervention, mediation, short-term emergency shelter, therapeutic mentoring; transitional housing and support services, weekly LGBT for high school aged teens, and educational services to 330 Brookline teens and their families.
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 330 Brookline teenagers, with 70% of all participants in this program from very-low, low-, and moderate-income households.
	Location Description	Services are provided at the Brookline Community Mental Health Center, 41 Garrison Road, Brookline, MA 02446.
	Planned Activities	The range of counseling programs offered through the Adolescent Outreach Program include: In-Home Therapy (IHT)Program; Therapeutic Mentoring Program; Brookline resilient Youth Team (BRYT); in partnership with Brookline's METCO program, diversity initiative for black and latino boys and girls; Transition to Independent Living (TILP); and weekly group for LGBT high school aged teens.
7	Project Name	BCMHC Comprehensive Services
	Target Area	
	Goals Supported	
	Needs Addressed	Homelessness Prevention Public Services
	Funding	CDBG: \$36,700 Public Service Agencies: \$366,275
	Description	The program services over 320 Brookline children ages 3-12 with crisis intervention, counseling, case management services to homeless families, consultation and educational services. CDBG funding will enable the Brookline Community Mental Health center (BCMHC)to offer CDBG subsidies to income eligible children and their families who are uninsured or underinsured, with no other means to access services in fiscal year 2019.
	Target Date	6/30/2019

	Estimate the number and type of families that will benefit from the proposed activities	The program serves over 300 Brookline children, with those served being documented at 70% very-low, low-, and moderate-income.
	Location Description	Brookline Community Mental Health Center, 41 Garrison Road, Brookline, MA 02446
	Planned Activities	Studies show that 20% of all youth have emotional or behavioral problems. Homelessness and high risk of eviction is a problem for low/moderate income individuals and families. All counseling, crisis-intervention, and educational services provided are aimed to help children function better at school and home, with a decreased need for out of home placement. For children under the age of six, to reduce conflict and stress within the home, and promote psychological and medical health. For their Homeless Family programs, BCMHC will assist Brookline families to obtain economic and emotional stability. For those families participating in the ROSS program, the goal is to help families achieve financial independence.
8	Project Name	Brookline Elder Taxi System
	Target Area	
	Goals Supported	
	Needs Addressed	Public Services
	Funding	CDBG: \$45,000
	Description	
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	400 low and moderate income elders
	Location Description	Administration of the program takes place at the Council on Aging at 93 Garrison Road, Brookline, MA 02446.

	Planned Activities	Providing income eligible seniors with the opportunity to participate in this program and purchase taxi vouchers at a discount. The cab companies, as part of their licensure with the Town, must participate in this program, and they specifically contribute 25% discount towards the return tickets. Seniors purchase \$80.00 worth of taxi vouchers. The seniors then call the participating taxi companies to take to their designated trips.
9	Project Name	Next Steps Program
	Target Area	
	Goals Supported	
	Needs Addressed	Public Services
	Funding	CDBG: \$10,000 Public Service Agencies: \$55,701
	Description	
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	Assist 55 new very-low and low-income adults to explore employment/education potential.
	Location Description	Trustman Family Development, Egmont/Dummer Streets, Brookline MA 02446 High Street Family Development, 22 High Street, Brookline, MA 02445
Planned Activities	Planned activities are to: 1) identify needs and create/revise individual action plans that include goals and strategies to achieve results in employment or further education and training; 2) assist clients with job readiness skills counseling services such as producing a resume and cover letter, exploring web-based employment services and filling out or completing applications for continuing education, and; 3) assist with referrals for job training, continuing education programs, or study groups to better understand personal finance. The goal is to improve the quality of clients' lives by participating in structured programs that lead to educational advancement and employment	
10	Project Name	Parent Child Home Program
	Target Area	
	Goals Supported	

	Needs Addressed	Public Services
	Funding	CDBG: \$1,400 Public Service Agencies: \$52,740
	Description	
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	Projecting to serve 20 very-low, low- and moderate-income families who are part of a large growing immigrant population in Brookline. Currently serving families who come from parts of the world such as the Dominican Republic, Haiti, Russia, Puerto Rico, Ethiopia, China, and Korea.
	Location Description	Home visitors go to each household requiring services - meeting with families for 1/2 hour sessions twice weekly for a two-year period.
	Planned Activities	During the twice weekly home visit sessions, practitioners provide books and toys as a gift to the families to stimulate play and interaction with clients. Practitioners assist home visitors to model verbal interaction, parenting techniques, and educational play. At set intervals the program hosts activities to help the families overcome social isolation.
11	Project Name	Brookline ESOL Program
	Target Area	
	Goals Supported	
	Needs Addressed	Public Services
	Funding	CDBG: \$10,000 Public Service Agencies: \$48,075
	Description	
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	Assist 50 new very-low and low-income adults.
	Location Description	ESOL program classes are at the following Brookline locations: 61 Park Street; 90 Longwood Avenue; 50 Pleasant Street; and 55R Egmont Street.
	Planned Activities	This program will assist low and moderate income residents to learn English as a second language so as to help them with easier integration in the community.

12	Project Name	Work Connections for Youth
	Target Area	
	Goals Supported	
	Needs Addressed	Public Services
	Funding	CDBG: \$57,090 Public Service Agencies: \$34,190
	Description	
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	The Work Connections program will serve approximately 25 very-low, low- or moderate-income youth.
	Location Description	24 Webster Place, Brookline, MA 02445
Planned Activities	Participants will be participate in a seven week training program which will be split with 4 hours of training in the morning, followed by 2 hours of on the job mentoring.	
13	Project Name	Gateway East Right of Way Acquisition
	Target Area	
	Goals Supported	Public Facilities/Public Improvements
	Needs Addressed	Public Facilities/ Infrastructure
	Funding	CDBG: \$470,565 Town: \$1,250,000
	Description	
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	Within the eligible area there are 50.5 % very-low, low-, and moderate-income households
	Location Description	On the Route 9 Corridor from High Street to the Muddy River at Pond Avenue

	Planned Activities	To acquire all temporary and permanent easements needed for the construction of the Gateway East project, and work with landowners and Town Counsel to establish fair compensation for permanent rights and construction easements. To secure all right-of-way needed for the construction of the Gateway East project.
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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

The Town of Brookline is included in the HUD FY 2017 area-basis exception grantees. Although new data has identified three geographic areas with greater than fifty-one percent low- and moderate-income residents, because the town is an exception community, it looks for opportunities to allocate funding, particularly for public facilities with area benefit, to block areas where the highest concentration of low- and moderate-income households reside.

Funding allocations are based on programs or projects meeting community needs as identified in the Consolidated Plan and for identified opportunities to develop and preserve housing for low- and moderate-income residents.

Geographic Distribution

Target Area	Percentage of Funds

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

There are no areas in the community where resources will be geographically directed given the distribution of low- and moderate-income households within the Town, as identified through ACS data. Funds will be dispersed throughout the community for a variety of projects and programs, based upon need, funding availability, and a prospective recipient's ability to bring leveraged resources to CDBG-funded activities. Funds are awarded to eligible activities based on meeting a national objective, eligibility, and identification of needs and resources.

Not applicable to the Town.

AP-75 Barriers to affordable housing -91.420, 91.220(j)

Introduction

Affordable housing is the key to maintaining the diversity of Brookline as a community. However, the costs of renting and owning a home in Brookline continue to far exceed the ability of low- and moderate-income households to pay. The scarcity and high market value of larger properties – whether existing rentals or developable land – place them beyond the capacity of affordable housing developers. Gap funding needs per unit therefore are very high, opportunities are unpredictable, and projects often have long-term horizons. The level of resources required to close the gap for any one project, be it in new multi-family construction or a single homebuyer purchase, is great. All sources of funding are continue to be diminished and various restrictions on the commitment and use of each source necessitates creative allocation of funding to maximize impact and leverage other investment.

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

In order to address the need for housing units, Brookline completed a Housing Production Plan which was approved by the MA Department of Housing and Community Development in November of 2016. This Plan outlines goals and strategies that the Town will pursue to increase the number of affordable units available town-wide. The plan identifies specific areas of Town that can support additional affordable and mixed-income housing, with a particular focus on underutilized parcels in Brookline’s commercial corridors and on Town-owned land. The Town’s Major Parcels Study (MPS) will help the Town to explore options that enable the Town to act on land opportunities as they arise, including potential zoning changes, new planning initiatives, public-private partnerships, changes in policy as well as possible programming and financing mechanisms. These options will require further study by the Town in consultation with the community. They offer myriad ways to collaborate with major parcel owners to achieve outcomes that support Brookline’s long-term vision for the future. It is expected that MPS will help the Town build relationships with major parcel owners and will support planning for long-term needs, including affordable housing.

Brookline will continue to use its Zoning Bylaw proactively to encourage affordable housing as part of a market-rate project through its inclusionary zoning provision. In addition, the Town's Housing Advisory Board will continue to explore options to allow Accessory Dwelling Units by advocating for legislative changes at the state level and on the local level through coordination with the Brookline Community Aging Network.

AP-85 Other Actions - 91.420, 91.220(k)

Introduction

This section discusses the Town's effort's in addressing underserved needs, expanding and preserving affordable housing, reducing lead-paint hazards, and developing institutional structure for delivering housing and community development activities.

Actions planned to address obstacles to meeting underserved needs

With obstacles identified, the Town will move forward with the following actions to address underserved needs: a) subsidize owner units to make them affordable to moderate-income small and large families (dependent on availability of sufficient project funding); b) oversee use of Inclusionary Zoning to ensure developers proposing new projects meet affordable housing requirements; c) use Brookline Housing Trust funds as a vehicle to assist affordable housing developers to respond readily to market opportunities, with HOME, CDBG, and the Housing Trust to write-down development costs, and; d) continue outreach to property owners (such as lodging houses in order to facilitate potential use by non-profit operators/developers as affordable housing.

Actions planned to foster and maintain affordable housing

Brookline will continue to require, through its Zoning By-Law, the provision of affordable housing from all new developments of six or more units.

The Town will continue to support the Brookline Housing Authority, who owns and manages the largest affordable housing portfolio in the Town. There is a long recognized priority for the Town to assist the BHA with its preservation efforts, including addressing capital needs, as well as for partnering on development opportunities when the BHA can increase the Town's supply of affordable housing units, such as through the recent construction of 32 rental housing units at 86 Dummer Street. In FY19 (FFY18), the Town of Brookline will begin to work with the Brookline Housing Authority on a multi-year Strategic Preservation Initiative. This project will take advantage of HUD's Rental Assistance Demonstration Program as well as federal and state tax credits and state and local subsidies to rehabilitate and preserve nearly 500 units of affordable public housing in six different properties.

Less than 10% of Brookline's residential building stock is designated as affordable, as defined by the requirements of MA Department of Housing and Community Development's Subsidized Housing Inventory (SHI). For this reason, Brookline has experienced a continued influx of development proposals that utilize the comprehensive permitting process established by Massachusetts General Law, Chapter 40B. Town departments will continue to provide organized input and administration when these proposals occur, with the intent to produce affordable housing that effectively meets the needs of all Town residents and remains permanently affordable.

Actions planned to reduce lead-based paint hazards

The Town will continue to act as the authorized processing agency for the MassHousing "Get the Lead Out" program, a low-cost loan program for lead paint removal for income-eligible households and landlords who rent to income-eligible households.

The Health Department of the Town will continue to respond to reported violations of the EPA Renovation, Repair and Painting Rule (RRP Rule), which requires contractors to follow safe work practices when working in residential properties built before 1978. In addition, the Town will continue to require lead paint abatement as part of renovation programs for family housing undertaken by private developers using public funds when such housing is to serve families with children.

Actions planned to reduce the number of poverty-level families

Brookline's goal is to help individuals and families increase and/or maintain self-sufficiency through the acquisition of permanent affordable housing, health care, food assistance, mainstream resources, or any combination of these which offer the most impactful way to reduce the number of recipients living at or below the poverty level.

The Town recognizes that families living in poverty or on the fringe often avoid homelessness through supportive services that are funded through CDBG, Continuum of Care and ESG. As well, the provision of language and job skills services are viable ways to keep people on the brink of poverty or out of poverty. The Town continues to support funding for dynamic service programs that serve poverty level or other low-income households. These programs include the Steps to Success, Work Connections (academic support and training leading to job development); Next Steps (career training resource/referral); the Brookline Learning Project (English as a Second language) and; programs offered by the Brookline Community Mental Health Center, which provides critical support programs for families/individuals dealing with a wide array of crises and mental health issues.

The Town partners with non-profits to provide social service programs to a diverse, changing, and ever-increasing population. The Parent Child Home Program helps low-income families with young children at risk of delayed emotional or intellectual growth/development by providing access to early education; socialization opportunities through the use of books and toys, and; counseling and guidance for new families as they look to integrate into the community.

The Town strives to consistently offer programs through municipal agencies that help families to improve their housing situation and standard of living. It is the Town's strong belief that providing support to low-income rental projects is critical to ensuring that poverty-level families have stable homes at affordable rents.

Within the next year it is anticipated that there will be actions taken by the Town to foster economic opportunities and create job opportunities to help poverty-level, low- to moderate-income and over

100% AMI families. A new hotel is in the permitting stage and will soon be under construction. Construction for Children's Hospital Boston's project, which will expand existing medical office space as part of a mixed-use development, is on-going. The Town, via its public service programs, will explore ways to link these new employers with individuals and families who participate in CDBG-sponsored public service programs.

Actions planned to develop institutional structure

There is an established institutional structure in place within the Town. The Community Planning Division of the Department of Planning and Community Development was responsible for overseeing the creation of the FY 2016-2020 Consolidated Plan and the current Annual Action Plan for FY 2019. The Town is part of the WestMetro HOME Consortium with the City of Newton as the lead agency. As well, the Town, as a former member of the Brookline-Newton-Waltham-Watertown Homelessness Consortium, will continue to advocate at the state level for local programs that serve the homeless. Because of its solid foundation with CDBG, HOME and ESG, the Town will continue to be proactive in meeting grant requirements, is adept at identifying populations needing services or assistance and understands the need to forge partnerships with local and regional stakeholders to ensure that service gaps are filled and underserved needs are met.

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

A number of Brookline's programs serving low-income households are run by the Brookline Housing Authority, Town departments, and outside agencies. In addition, the Brookline Community Mental Center (BCMHC) provides services to a number of households living in affordable housing throughout the Town. The BCMHC engages often with other service providers and funders to explore opportunities for collaboration, with the goal of more effectively meeting needs. The BCMHC is currently a service provider for the Brookline Housing Authority and provides services to residents through a Resident Opportunity for Self Sufficiency (ROSS) grant.

Discussion

Brookline is a highly desirable community that experiences extreme market pressures, which increases the cost of housing at the every level, making it difficult for low- and moderate-income persons to live in the community. The lack of vacant land in multi-family districts as well as the high cost of existing multi-family buildings makes development of new housing extremely expensive, suppressing the Town's housing supply and affordable housing options. The cost of development in Brookline means that affordable housing developers require substantial subsidy to make projects financially feasible. The continued erosion of housing affordability threatens the attainment of one of the Town's planning goals, notably maintaining the town's population diversity. The Town's continued commitment of HOME, CDBG and Brookline Housing Trust resources toward the creation and preservation of affordable housing consistently leverages other public and private development resources, helping to ensure the

Town's continued diversity.

Nevertheless, the Town continues to attract new residents because of the reputation of its schools, its convenient access to public transportation, its proximity to a world-class medical service and employment center, and its proximity to the City of Boston. Many of these new residents benefit from the social services offered through the agencies that CDBG funds help to support.

Program Specific Requirements

AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)

Introduction

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	3,997
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	3,997

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.	100.00%