

Town of Brookline

FFY 2019 (FY2020)

Annual Action Plan



Prepared by:

Department of Planning and Community Development

July 2019

Table of Contents

AP-05	Executive Summary - 24 CFR 91.200 (c), 91.220 (b).....	1
PR-05	Lead & Responsible Agencies - 24 CFR 91.200 (b).....	5
AP-10	Consultation- 91.100, 91.200 (b), 91.215 (l).....	6
AP-12	Citizen Participation- 91.401, 91.105, 91.200 (c).....	13
AP-15	Expected Resources – 91.420(b), 91.220 (c) (1, 2)	19
AP-20	Annual Goals – 91.420, 91.220 (c) (3) & (e).....	23
AP-35	Projects – 91.420, 91.220 (d)	25
AP-38	Projects – Summary	26
AP-50	Geographic Distribution – 91.420, 91.220 (f)	37
AP-75	Barriers to Affordable Housing – 91.420, 91.220 (j).....	38
AP-85	Other Actions – 91.420, 91.220 (k).....	39
AP-90	Program Specific Requirements – 91.420, 91.220 (l) (1, 2, 4)	43



U.S. Department of Housing and Urban Development

MASSACHUSETTS STATE OFFICE, NEW ENGLAND AREA
Office of Community Planning and Development
Thomas P. O'Neill, Jr. Federal Building
10 Causeway Street - Fifth Floor
Boston, Massachusetts 02222-1092

Mr. Joseph Viola, Director
Town of Brookline
Planning & Community Development Dept.
333 Washington Street
Brookline, MA 02445

JUL 11 2019

Dear Mr. Viola:

Subject: 2019 CDBG Grant Agreement

The Boston field office would like to thank you for your continued partnership in providing quality affordable housing through HUD programs. Enclosed are Grant Agreements for the following programs:

Community Development Block Grant (CDBG)	\$1,371,270
Total FY 2019 Award	\$1,371,270.

The Grant Agreement constitute contracts between the Department of Housing and Urban Development and the Town of Brookline

A primary goal of the Department is to reduce housing discrimination, affirmatively further fair housing through CPD programs, and promote diverse, inclusive communities. To that end, we encourage your community to take all measures necessary to ensure compliance with the Fair Housing requirements associated with these funds which are found at 24 CFR Section 570.601.

Effective implementation of projects and the timely expenditure of grant funds is of critical importance to the success of the CDBG program. There is no single reason why CDBG grantees are untimely in carrying out activities. Timeliness does not depend on the size of a community nor the size of a grant. A variety of grantee management and

capacity issues play a role in the timeliness problem. Because of the myriad of reasons for untimely performance, there is no single solution to the timeliness problem. Each grantee must identify and address the problem in the context of their own program and community.

Please note **the special condition in your CDBG Funding Approval/Agreement** concerning the Dun and Bradstreet Data Universal Numbering System (DUNS), the Central Contractor Registration (CCR) database, and the Federal Funding Accountability and Transparency Act (as provided in 2 CFR part 25, Universal Identifier and Central Contractor Registration, and 2 CFR part 170, Reporting Subaward and Executive Compensation Information). This special condition also includes a requirement in 8. (b) related to funding assistance and payment of indirect costs pursuant to 2 CFR 200, Subpart E - Cost Principles. Per the instructions in 8. (b), **please attach a schedule in the format provided to each of the three copies of the grant agreement.**

You are reminded that certain activities are subject to the provisions of 24 CFR Part 58 (**Environmental Review Procedures**). Funds for such activities may not be obligated or expended until HUD has approved the release of funds in writing. A request for release of funds must be accompanied by an environmental certification, and until the RROF is approved and notification is received, no HUD funds should be committed. If the project or activity is exempt per 24 CFR 58.34 or categorically excluded (except in extraordinary circumstances), no RROF is required.

Additionally, you are reminded of your responsibilities to comply with other applicable laws and related program requirements for:

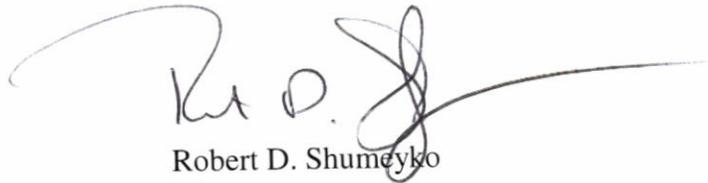
- Employment and contracting opportunities under 24 CFR Section 570.607;
- Lead based paint under 24 CFR Section 570.608;
- Citizen participation requirements under 24 CFR Section 91.200 (b), 91.115, and 91.401, as applicable;
- Grant administration requirement under 24 CFR Section 570.501 – 570.505; and
- Record keeping requirements under 24 CFR Section 570.506.
- All other applicable Federal Regulations.

Please execute two copies of the CDBG Funding Approval/Agreements (and the CDBG Special Conditions attachment) and return one of the agreements to this office to the attention of Robert Shumeyko Director, Community Planning and Development within 10 days. Please ensure the City's elected official and/or authorized designee signs the grant agreements in the box **directly across from the HUD CPD Director's signature. Please Do NOT sign the agreement in box 12c.** Failure to return the executed grant agreement within 60 days may be deemed to constitute rejection of the grant and cause for HUD to determine that funds are available for reallocation to other grantees.

For additional information and guidance, please refer to the HUD exchange at:
<https://www.hudexchange.info/manage-a-program/grant-based-accounting/>

HUD congratulates Brookline on its grant award, and we look forward to assisting you in accomplishing your programs goals. If you have any questions or concerns regarding this , please contact Cindy Lopez, Sr. CPD Representative, Cynthia.E.Lopez@HUD.Gov or my office at 617-994-8364 if you have any questions or concerns regarding this grant agreement notification or the procedures set forth in this letter

Sincerely,

A handwritten signature in black ink, appearing to read 'R. D. Shumeyko', with a long horizontal flourish extending to the right.

Robert D. Shumeyko
Director
Community Planning and Development

Enclosures

Funding Approval/Agreement

Title I of the Housing and Community Development Act (Public Law 930383)
 HI-00515R of 20515R

U.S. Department of Housing and Urban Development
 Office of Community Planning and Development
 Community Development Block Grant Program

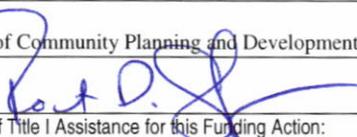
OMB Approval No. 2506-0193
 exp 5/31/2018

1. Name of Grantee (as shown in item 5 of Standard Form 424) Town of Brookline	3a. Grantee's 9-digit Tax ID Number 046001102	3b. Grantee's 9-digit DUNS Number 076577014
2. Grantee's Complete Address (as shown in item 5 of Standard Form 424) 333 Washington Street Brookline, MA 02146	4. Date use of funds may begin (mm/dd/yyyy) 07/01/2019	
	5a. Project/Grant No. 1 B-19-MC-25-0004	6a. Amount Approved \$1,371,270.00
	5b. Project/Grant No. 2	6b. Amount Approved

Grant Agreement: This Grant Agreement between the Department of Housing and Urban Development (HUD) and the above named Grantee is made pursuant to the authority of Title I of the Housing and Community Development Act of 1974, as amended, (42 USC 5301 et seq.). The Grantee's submissions for Title I assistance, the HUD regulations at 24 CFR Part 570 (as now in effect and as may be amended from time to time), and this Funding Approval, including any special conditions, constitute part of the Agreement. Subject to the provisions of this Grant Agreement, HUD will make the funding assistance specified here available to the Grantee upon execution of the Agreement by the parties. The funding assistance specified in the Funding Approval may be used to pay costs incurred after the date specified in item 4 above provided the activities to which such costs are related are carried out in compliance with all applicable requirements. Pre-agreement costs may not be paid with funding assistance specified here unless they are authorized in HUD regulations or approved by waiver and listed in the special conditions to the Funding Approval. The Grantee agrees to assume all of the responsibilities for environmental review, decision making, and actions, as specified and required in regulations issued by the Secretary pursuant to Section 104(g) of Title I and published in 24 CFR Part 58. The Grantee further acknowledges its responsibility for adherence to the Agreement by sub-recipient entities to which it makes funding assistance hereunder available.

U.S. Department of Housing and Urban Development (By Name) Robert D. Shumeyko	Grantee Name (Contractual Organization) Mr. Neil A. Wishinski
--	--

Title Director of Community Planning and Development	Title Chair, Board of Selectmen
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Signature 	Date (mm/dd/yyyy) 7/10/19	Signature	Date (mm/dd/yyyy)
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7. Category of Title I Assistance for this Funding Action: Entitlement, Sec 106(b)	8. Special Conditions (check one) <input type="checkbox"/> None <input checked="" type="checkbox"/> Attached	9a. Date HUD Received Submission (mm/dd/yyyy) 06/17/2019	10. check one <input checked="" type="checkbox"/> a. Orig. Funding Approval <input type="checkbox"/> b. Amendment Amendment Number
		9b. Date Grantee Notified (mm/dd/yyyy) 06/20/2019	
		9c. Date of Start of Program Year (07/01/2019)	

11. Amount of Community Development Block Grant			
	FY (2019)	FY (2018)	FY (2017)
a. Funds Reserved for this Grantee	\$1,370,930.00	\$ 340.00	\$.00
b. Funds now being Approved			
c. Reservation to be Cancelled (11a minus 11b)			

12a. Amount of Loan Guarantee Commitment now being Approved N/A	12b. Name and complete Address of Public Agency N/A
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Loan Guarantee Acceptance Provisions for Designated Agencies:
 The public agency hereby accepts the Grant Agreement executed by the Department of Housing and Urban Development on the above date with respect to the above grant number(s) as Grantee designated to receive loan guarantee assistance, and agrees to comply with the terms and conditions of the Agreement, applicable regulations, and other requirements of HUD now or hereafter in effect, pertaining to the assistance provided it.

12c. Name of Authorized Official for Designated Public Agency N/A
Title N/A
Signature N/A

HUD Accounting use Only

Batch	TAC	Program	Y	A	Reg	Area	Document No.	Project Number	Category	Amount	Effective Date (mm/dd/yyyy)	F
	153											
	176											
			Y					Project Number		Amount		
								Project Number		Amount		
			Y					Project Number		Amount		

Date Entered PAS (mm/dd/yyyy)	Date Entered LOCCS (mm/dd/yyyy)	Batch Number	Transaction Code	Entered By	Verified By
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8. Special Conditions.

- (a) The period of performance for the funding assistance specified in the Funding Approval (“Funding Assistance”) shall begin on the date specified in item 4 and shall end on September 1, 2026. The Grantee shall not incur any obligations to be paid with such assistance after September 1, 2026.
- (b) The Recipient shall attach a schedule of its indirect cost rate(s) in the format set forth below to the executed Agreement that is returned to HUD. The Recipient shall provide HUD with a revised schedule when any change is made to the rate(s) described in the schedule. The schedule and any revisions HUD receives from the Recipient shall be incorporated herein and made a part of this Agreement, provided that the rate(s) described comply with 2 CFR part 200, subpart E.

<u>Administering Department/Agency</u>	<u>Indirect cost rate</u>	<u>Direct Cost Base</u>
_____	_____ %	_____
_____	_____ %	_____
_____	_____ %	_____
_____	_____ %	_____
_____	_____ %	_____

Instructions: The Recipient must identify each agency or department of the Recipient that will carry out activities under the grant, the indirect cost rate applicable to each department/agency (including if the de minimis rate is used per 2 CFR §200.414(f)), and the type of direct cost base to which the rate will be applied (for example, Modified Total Direct Costs (MTDC)). Do not include indirect cost rates for subrecipients.

- (c) In addition to the conditions contained on form HUD 7082, the grantee shall comply with requirements established by the Office of Management and Budget (OMB) concerning the Dun and Bradstreet Data Universal Numbering System (DUNS); the System for Award Management (SAM.gov.); the Federal Funding Accountability and Transparency Act as provided in 2 CFR part 25, Universal Identifier and General Contractor Registration; and 2 CFR part 170, Reporting Subaward and Executive Compensation Information.
- (d) The grantee shall ensure that no CDBG funds are used to support any Federal, State, or local projects that seek to use the power of eminent domain, unless eminent domain is employed only for a public use. For the purposes of this requirement, public use shall not be construed to include economic development that primarily benefits private entities. Any use of funds for mass transit, railroad, airport, seaport or

highway projects as well as utility projects which benefit or serve the general public (including energy-related, communication-related, water-related and wastewater-related infrastructure), other structures designated for use by the general public or which have other common-carrier or public-utility functions that serve the general public and are subject to regulation and oversight by the government, and projects for the removal of an immediate threat to public health and safety or brownfield as defined in the Small Business Liability Relief and Brownfields Revitalization Act (Public Law 107-118) shall be considered a public use for purposes of eminent domain.

- (e) The Grantee or unit of general local government that directly or indirectly receives CDBG funds may not sell, trade, or otherwise transfer all or any such portion of such funds to another such entity in exchange for any other funds, credits or non-Federal considerations, but must use such funds for activities eligible under title I of the Act.
- (f) E.O. 12372-Special Contract Condition - Notwithstanding any other provision of this agreement, no funds provided under this agreement may be obligated or expended for the planning or construction of water or sewer facilities until receipt of written notification from HUD of the release of funds on completion of the review procedures required under Executive Order (E.O.) 12372, Intergovernmental Review of Federal Programs, and HUD's implementing regulations at 24 CFR Part 52. The recipient shall also complete the review procedures required under E.O. 12372 and 24 CFR Part 52 and receive written notification from HUD of the release of funds before obligating or expending any funds provided under this agreement for any new or revised activity for the planning or construction of water or sewer facilities not previously reviewed under E.O. 12372 and implementing regulations.
- (g) CDBG funds may not be provided to a for-profit entity pursuant to section 105(a)(17) of the Act unless such activity or project has been evaluated and selected in accordance with Appendix A to 24 CFR 570 - "Guidelines and Objectives for Evaluating Project Costs and Financial Requirements." (Source - P.L. 113-235, Consolidated and Further Continuing Appropriations Act, 2015, Division K, Title II, Community Development Fund).

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): [Dropdown] * Other (Specify): [Text]
* 3. Date Received: [Text]	4. Applicant Identifier: B-19-MC-25-0004	
5a. Federal Entity Identifier: n/a	5b. Federal Award Identifier: n/a	
State Use Only:		
6. Date Received by State: [Text]	7. State Application Identifier: [Text]	
8. APPLICANT INFORMATION:		
* a. Legal Name: Town of Brookline		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 04-6001102	* c. Organizational DUNS: 0765770140000	
d. Address:		
* Street1: 333 Washington Street	[Text]	
Street2:	[Text]	
* City: Brookline	[Text]	
County/Parish: Norfolk	[Text]	
* State: MA: Massachusetts	[Dropdown]	
Province:	[Text]	
* Country: USA: UNITED STATES	[Text]	
* Zip / Postal Code: 0445-6899	[Text]	
e. Organizational Unit:		
Department Name: Brookline Select Board	Division Name: Dept of Planning and Comm. Dev	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: Ms. [Dropdown]	* First Name: Ewana	
Middle Name: C.	[Text]	
* Last Name: Lindo-Smith	[Text]	
Suffix: [Dropdown]	[Text]	
Title: CD Administrator		
Organizational Affiliation: Planning & Comm. Dev. oversees CDBG Grant for Bkln Sel. Brd.		
* Telephone Number: 617-730-2133	Fax Number: 617-730-2442	
* Email: elindo@brooklinema.gov		

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14-218

CFDA Title:

*** 12. Funding Opportunity Number:**

14-218

* Title:

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

*** 15. Descriptive Title of Applicant's Project:**

FFY2019 (FY2020) Annual Action Plan

Attach supporting documents as specified in agency instructions.

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="1371270.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text" value="0"/>
* f. Program Income	<input type="text" value="0"/>
* g. TOTAL	<input type="text"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

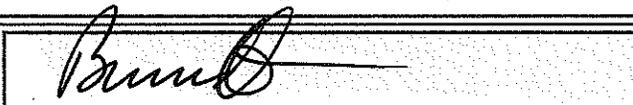
Authorized Representative:

Prefix: * First Name:
Middle Name:
* Last Name:
Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative: 

* Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 01/31/2019

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

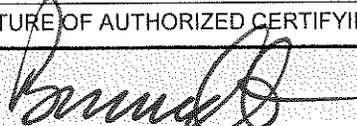
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Chair
APPLICANT ORGANIZATION Town of Brookline	DATE SUBMITTED 06/04/2019

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2019 (1) [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws -- It will comply with applicable laws.



Signature of Authorized Official

6-4-19

Date

CHAIR

Title

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

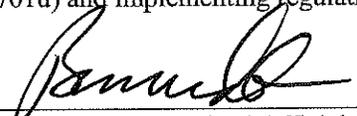
Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.



Signature of Authorized Official

6-4-19

Date

CHAIR

Title

OPTIONAL Community Development Block Grant Certification

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.



Signature of Authorized Official

6-4-19
Date

CHAIR

Title

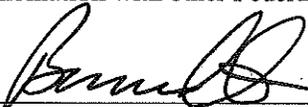
Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Subsidy layering -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;



Signature of Authorized Official

6-4-19
Date

CHAIR

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

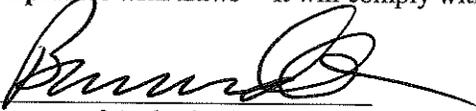
Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws -- It will comply with applicable laws.



Signature of Authorized Official

6-9-19
Date

CHAIR
Title

Executive Summary

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

1. Introduction

The FY2020 (FFY 2019) 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, 2019 and ending June 30, 2020. 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 2020 (FFY2019) can be found at AP-20.

The Town's housing goals are to preserve existing rental units and to create new rental housing in Brookline. The Brookline Housing Authority (BHA) will undertake capital improvement projects at two of its developments; the Town will move forward with the process to create affordable senior rental housing at the Town-owned Kent St lot and the Brookline Improvement Coalition will undertake energy efficiency and safety upgrades to affordable units it owns and manages. The outcomes are housing affordability, availability and accessibility, while the objectives are the provision of decent affordable housing and the creation of a suitable living environment.

Additionally, the Town will fund public facilities projects at the Brookline Community Mental Health Center(BCMHC) and for a major roadway project on Route 9. The BCMHC will undertake energy efficiency upgrades at its facility and; the Town will fund construction phase services 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.

Finally, 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 including youth, seniors and families.

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 sub-recipient 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 2020 (FFY2019) 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 to notify neighborhood groups, non-profits, Town Meeting members and past participating members of the CoC.

CDBG Advisory Committee meetings were held on February 25, 2019 and February 28, 2019 in Brookline Town Hall. Notification of the 30 day comment period on the Annual Action Plan was posted in the April 25, 2019 edition of the Brookline Tab. The comment period closed on May 25 2019. 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 4, 2019 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 completed 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 4, 2019 Public Hearing.

Comments from 6/4/2019 Select Board Public Hearing

- A member of the public suggested Town should undertake deeper outreach
- A member of the public questioned the allocation of resources to activities such as roadway projects and for technical and legal services when the funds are needed more in places like the Brookline Housing Authority for doors and locks
- A member of the public noted that when funding is available, notice of availability and applications for funding should be dispersed far and wide
- A member of the Select Board noted that the Brookline Housing Authority receives funding almost yearly
- A member of the Select Board noted that Gateway East (roadway project) is located in an area with a high percentage of low- and moderate-income housing; the project's accessibility improvements will provide roadway crossings where there are currently none

- A member of the public noted that investment in some areas can lead to unintended outcomes such as gentrification
- A member of the public noted that over the years the Town has done well with its CDBG funding; commenter was also sympathetic to the fact that the Town's funding is being reduced yearly and hoped the Town could continue to do well with less resources in coming years

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 FY2020(FY 2019) 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	
CDBG Administrator	BROOKLINE	Department of Planning and Community Development
HOPWA Administrator		
HOME Administrator		
HOPWA-C Administrator		

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

Ewana Lindo-Smith, CD Administrator, Department of Planning and Community Development, Brookline Town Hall, Room 309, 333 Washington St., Brookline, MA 02445, (617)-730-2133, elindo@brooklinema.gov

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

1. Introduction

The FY 2020(FFY2019) 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, 2019 and ending June 30, 2020. 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 a myriad of 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 will continue to be involved in this process at the local and state level via MA DHCD.

- Stakeholders provide a myriad of 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.

Emergency Solutions Grant (ESG) funds are awarded to local providers through a competitive Request for Proposals (RFP), providing shelter operations/services, homelessness prevention, and rapid re-housing services throughout the Brookline-Newton-Waltham-Watertown region. Newton Staff released the FY20 (FFY19) RFP on January 14, 2019 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 FY20 ESG allocation will support 8 projects across 5 sub-grantee agencies. The Balance of State (BoS), under the supervision of the MA Department of Housing and Community Development (ma DHCD), administers McKinney-Vento funds for the former BNWW CoC communities. The Brookline-Newton-Waltham-Watertown (BNWW) Continuum of Care (CoC), previously led by the City of Newton, merged with the Massachusetts Balance of State in December of 2016. On February 6, 2019, HUD awarded the BoS a total of \$12,941,371 in FFY18 funds, a 1% increase from the prior year. From that total, the BNWW Region received \$1,168,625 for three programs. Many programs have been consolidated. Subrecipients include Advocates, The Second Step, and Pine Street Inn, an agency with a strong community presence in Brookline, where it owns and operates a number of lodging houses.

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 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?	Public Housing Needs 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 2020 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 2020 and a multi-year Strategic Preservation Initiative utilizing the RAD program. 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 Elderly 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 2020 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.

Table 3 - Other local / regional / federal planning efforts

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 25, 2019 and February 27, 2019, two public meetings were held by the Town's CDBG Advisory Committee(citizen advisory group) whose charge is to make funding recommendations to the Brookline Select Board concerning the Town’s CDBG entitlement grant. The meetings are held to culminate a competitive RFP process where applicants apply for CDBG funds to support their projects or programs. These meetings provided citizens with an opportunity to participate in the Committee 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 June 4, 2019. 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 FY19 AAP was discussed at the Housing Advisory Board meeting on February 16, 2019. 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 2019, 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 and to identify and set forth a process for the use of Town-owned land for desirable uses, including affordable housing. To capitalize on housing options, the Town could explore potential zoning changes, new neighborhood or corridor 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. The plans consider myriad ways for the Town to collaborate with major parcel owners to achieve outcomes that support Brookline's long-term vision for the future. It is expected that the SAP/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 2020 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 2020 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	Internet Outreach	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 2020 CDBG Grant.	N/A - interested parties apply for grant funding via Competitive RFP		
2	Internet Outreach	Minorities Persons with disabilities Non-targeted/broad community all Income Groups	Another means of notification to citizens of the Town, interested parties, boards and commissions, Town meeting members of the availability of FY 2020 RFP.	N/A - Goal is to solicit interest from applicants for funding or queries on eligibility of possible activity prior to applying.		

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	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.			
4	Public Meeting	Minorities Non-targeted/broad community Residents of Public and Assisted Housing	Attendees at the first public meeting to review RFP submissions. Others in attendance were staff and applicants for funding.	Attendees at the first public meeting to review RFP submissions. Others in attendance were staff and applicants for funding.		

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	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 2020 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.		
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 2020 entitlement grant.	Result is funding recommendation made by CDBG Advisory Committee to Brookline Select Board for use of entitlement grant		

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	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.			
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 2019 (Town FY 2020) 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	1,371,270	0	154,668	1,525,938	0	CDBG allocation for FY 19 and FY18; prior year funds and projected program and revolving loan income to be reallocated as needed. Will appropriate \$154,668.43 in unallocated prior year funding, program income and revolving loan income received in FY 19 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	Housing Other	0	0	0	0	0	
Housing Trust Fund	public - local	Housing	0	0	0	0	0	
Other	private	Housing	0	0	0	0	0	
Other	public - federal	Acquisition Admin and Planning Housing	17,000	0	0	17,000	0	Projected HOME allocation to the Town of Brookline from the WestMetro HOME consortium.
Other	public - state	Public Improvements	0	0	0	0	0	
Other	public - local	Admin and Planning	166,660	0	0	166,660	0	Balance of salaries paid by the Town to facilitate administration and planning activities.
Other	public - local	Housing Other	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	Public Improvements	141,822	0	0	141,822	0	The Town will use these funds for the oversight of construction by MassDOT and its contractors and to respond to timely design or technical issues so as to expeditiously complete the construction work on the Gateway East Project and for energy efficiency improvements for a public facility.
Other	public - local	Public Services	1,187,879	0	0	1,187,879	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

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

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 and other subsidies through state agencies via a One Stop Application . 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, which leverages other significant public and private and sources.

With respect to public service leveraging, the creative and innovative use of CDBG dollars by local agencies continue 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 convened to determine the feasibility of building affordable housing on Town-owned parking lots, following 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. After undertaking due diligence and community process, the Town will release an RFP for the reuse of a Town-owned parking lot for affordable senior housing. It is expected that the process to reuse the Kent St. parking lot will move forward in FY 20, starting with site disposition and zoning at Brookline Town Meeting, and will move to construction in later years.

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: \$764,778	Rental units rehabilitated: 200 Household Housing Unit
2	Affordable Housing- New	2016	2020	Affordable Housing		Affordable Housing - New Units	CDBG: \$89,572	Other: 60 Other
3	Public Services	2016	2020	Non-Homeless Special Needs		Public Services	CDBG: \$205,690 Public Service Agencies: \$1,187,879	Public service activities other than Low/Moderate Income Housing Benefit: 1200 Persons Assisted
4	Public Facilities/Public Improvements	2016	2020	Non-Housing Community Development		Affordable Housing - Rental Public Facilities/ Infrastructure	CDBG: \$191,644 Town: \$141,822	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 3020 Persons Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Affordable Housing - Rehab Rental
	Goal Description	<p>In FY20, CDBG funds will be used for a resident security project at the High Street and Egmont Street Veteran’s developments. Building entry and doors that have deteriorated and are at the end of their useful life will be replaced.</p> <p>In FY20, the Town of Brookline will continue 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 (RAD) 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. Phase 1 of BHA’s RAD project is underway and Phase 2 is expected to begin in FY 20.</p> <p>In FY20, the Town will fund energy efficiency and safety upgrades to affordable units owned and managed by the Brookline Improvement Coalition.</p>
2	Goal Name	Affordable Housing- New
	Goal Description	<p>In FY20 (FFY19), 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. Construction will likely begin prior to FY 20 and will continue over the course of FYs 20-21.</p>
3	Goal Name	Public Services
	Goal Description	<p>In FY20, the Town will fund critical public services, with the goal of providing support for a wide array of services that primarily benefit low- and moderate-income households including youth, seniors and families.</p>
4	Goal Name	Public Facilities/Public Improvements
	Goal Description	

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 Safety 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 Construction Phase Services
14	BCMHC Installation of High Efficiency HVAC
15	BIC, 154-156 Boylston street Energy and Fire Safety

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.

AP-38 Project Summary

Project Summary Information	Project Name	CD Administration
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$179,595 Town: \$90,257
	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 fully or partially by CDBG funds.
	Target Date	6/30/2020
	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 the 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	
	Needs Addressed	
	Funding	CDBG: \$94,659 Town: \$76,403

	Description	Staff will work on facilitating current public facilities activity that ties into Comprehensive Planning and the Five Year Consolidated Plan, which pertain to major corridor planning projects underway.
	Target Date	6/30/2020
	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	
	Planned Activities	
3	Project Name	BHA Resident Safety projects
	Target Area	
	Goals Supported	
	Needs Addressed	Affordable Housing - Rental Affordable Housing - Rehab Existing
	Funding	CDBG: \$435,850
	Description	CDBG funds will be used for capital improvements for two Brookline Housing Authority Developments at the High Street Veterans and Egmont Street Veterans.
	Target Date	6/30/2020
	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 Egmont Street Veterans Development
	Planned Activities	Funding will cover improvements at two Brookline Housing Authority developments. CDBG funds will be used for significant enhancements and safety upgrades to all doors and locks at High St and Egmont developments.
4	Project Name	Housing Division

	Target Area	
	Goals Supported	
	Needs Addressed	Affordable Housing - Rental Affordable Housing - New Units Affordable Housing - Rehab Existing Affordable Housing - Acquisition of Existing Units Fair Housing
	Funding	CDBG: \$269,678 HOME: \$17,000
	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	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 390 housing units will benefit.
	Location Description	Egmont Street Veterans Development (BHA) 384 Harvard St. - 2Life Communities (formerly JCHE) Kent/Station Street Parking lot High Street Veterans Development (BHA) Other BHA Developments (RAD)
	Planned Activities	Oversight of Capital projects, the construction of new affordable rental housing and the planning and disposition process for Town-owned land to be used for affordable housing.
	5	Project Name
Target Area		
Goals Supported		
Needs Addressed		Affordable Housing - Rental Affordable Housing - New Units Fair Housing
Funding		CDBG: \$89,572

	Description	Funds will be used for Technical and Legal Service to develop and preserve new rental housing opportunities for extremely-low, low-, and moderate-income households.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	60 affordable senior housing units
	Location Description	Kent/Station Street Town-owned municipal parking lot, 25 Kent St., Brookline, MA.
	Planned Activities	Technical and Legal Services for Kent/Station St. Town-owned parking lot - affordable Housing for Seniors.
6	Project Name	BCMHC Adolescent Outreach Program
	Target Area	
	Goals Supported	
	Needs Addressed	Public Services
	Funding	CDBG: \$43,673 Public Service Agencies: \$468,486
	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	6/30/2020
	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	Public Services
	Funding	CDBG: \$34,670 Public Service Agencies: \$404,151
	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 2020.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	The program serves over 320 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	<p>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, the goal is to reduce conflict and stress within the home, and promote psychological and medical health.</p> <p>For their Homeless Family programs, BCMHC will assist Brookline families obtain economic and emotional stability. For those families participating in the ROSS program, the goal is to help families achieve financial independence.</p>
8	Project Name	Brookline Elder Taxi System
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$34,005 Public Service Agencies: \$45,000
	Description	The Brookline Elder Taxi System (BETS) provides important transportation to Brookline's low to moderate income elders through discounts and partial subsidy of taxi rides. Over 400 elders participate in the program.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	450 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 them to to their designated trips.
9	Project Name	Next Steps Program
	Target Area	
	Goals Supported	
	Needs Addressed	Public Services
	Funding	CDBG: \$10,785 Public Service Agencies: \$79,392
	Description	This is a resource and referral program. The program aims to reduce and alleviate poverty in Brookline by addressing the career development needs of approximately 55 unemployed and underemployed low-income adults aged 19 years up
	Target Date	6/30/2020
	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	
10	Project Name	Parent Child Home Program
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$7,145 Public Service Agencies: \$51,650

	Description	The Parent Child Home program is a two-year home visiting, risk prevention program for low- and moderate-income culturally diverse families with young children living in the town. The program teaches parents to stimulate and enhance their child's verbal and cognitive skills by providing a "learning through play" experience that fosters verbal and social-emotional interactions between toddlers and parents. This helps to strengthen the parent/child relationship
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Projecting to serve 24 or more 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, Japan, Israel and Mexico.
	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	
	Funding	CDBG: \$13,695 Public Service Agencies: \$105,000
	Description	The program serves as the primary provider of English language classes for low-income adults living in the Town of Brookline.
	Target Date	6/30/2020

	Estimate the number and type of families that will benefit from the proposed activities	Assist 50 or more 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: \$61,717 Public Service Agencies: \$34,200
	Description	The Work Connections for Youth Program will provide 32 income eligible Brookline High School Students Grades 10-12 with career-oriented job training experiences in conjunction with skills and preparation necessary for academic and college-focused success
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	The Work Connections program will serve approximately 32 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 Construction Phase Services
	Target Area	

	Goals Supported	
	Needs Addressed	Public Facilities/ Infrastructure
	Funding	CDBG: \$161,003 Town: \$123,822
	Description	The Town will use these funds for the oversight of construction by MassDot and its contractors so as to expeditiously complete the construction work on the Gateway East Project.
	Target Date	6/30/2020
	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	Given the complexity of the project the nature of the Route 9 corridor, the limited availability of Town Engineering and Planning Staff to manage this project, retaining the services of construction specialists to provide various support thorough the construction phase of this project is a critical component for project success.
14	Project Name	BCMHC Installation of High Efficiency HVAC
	Target Area	
	Goals Supported	
	Needs Addressed	Public Facilities/ Infrastructure
	Funding	CDBG: \$30,641 Public Service Agencies: \$18,000
	Description	CDBG funds will be used to to replace and upgrade the heating, ventilation and air conditioning units in its main facility at 41 Garrison Road with reliable high efficiency units.
	Target Date	6/30/2020

	Estimate the number and type of families that will benefit from the proposed activities	Approximately 4,000 low to moderate income individuals receive services from the Center each year.
	Location Description	41 Garrison Road, Brookline, MA 02445
	Planned Activities	This project will replace and upgrade the Heating Ventilation and Air Conditioning (HVAC) with high efficiency units in its main BCMHC Public facility building at 41 Garrison Road.
15	Project Name	BIC, 154-156 Boylston street Energy and Fire Safety
	Target Area	
	Goals Supported	
	Needs Addressed	Affordable Housing - Rental
	Funding	CDBG: \$59,250 Public Service Agencies: \$31,432
	Description	Safety and Energy Efficiency capital projects
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Estimated that 6 units and 19 household members will benefit, ranging from extremely-low to moderate-income
	Location Description	154-156 Boylston Street, Brookline, MA 02445
Planned Activities	Purchase and installation of high efficiency boilers, new water efficient toilets, aerators and hardwired smoke and carbon monoxide detectors.	

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 2019 area-basis exception grantees based on 2011-2015 ACS data. 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 blocks 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.

Discussion

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 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 and certified by the MA Department of Housing and Community Development in November of 2016 and certified again in November 2018. 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 the 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 Strategic Asset Plan/Major Parcels Study (SAP/MPS) will help the Town to explore options that enable the Town to act on land opportunities as they arise or are identified, 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. There are a myriad of 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.

Discussion

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 ownership units to make them affordable to low to moderate-income small and large families (dependent on availability of sufficient project funding); b) oversee the implementation of Inclusionary Zoning to ensure that developers proposing new projects meet the Town's 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 used 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. In FY20 (FFY19), the Town of Brookline will continue to work with the Brookline Housing Authority on Phase 1 and Phase 2 of a multi-year Strategic Preservation Initiative. This project will take advantage of HUD's Rental Assistance Demonstration Program (RAD) 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 2020. The Town is part of the West Metro 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 world-class medical services 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	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%