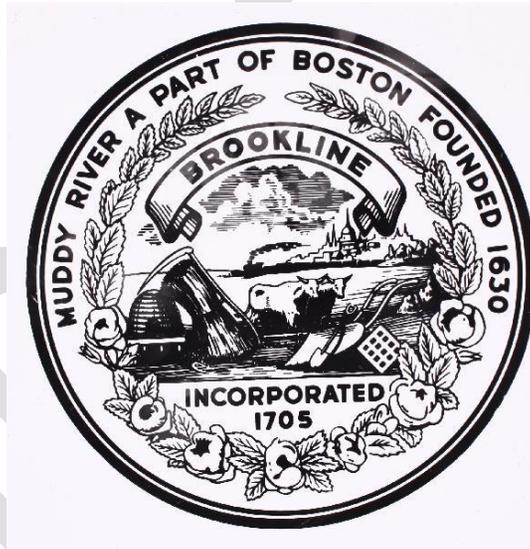


Town of Brookline

FFY 2021 (FY 2022)

*Consolidated Annual Performance and Evaluation Report
(DRAFT CAPER)*



TOWN OF BROOKLINE, MASSACHUSETTS

Reporting Period: Fiscal Year FFY 2021 (FY2022)

July 1, 2021 to June 30, 2022

September 13, 2022

CAPER

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CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

In FY 2022, the Town's Community Planning staff continue their role as steward of CDBG funds, which were administered to over 16 new and ongoing projects and programs. As in past years, program success was measured by the extent to which subrecipients met local needs as defined in their contracts, following the priorities put forth in the Town's Consolidated and Annual Actions Plans. As of June 30th, 2022, the Town had a .70 program funding ratio.

Public Facilities: The Gateway East project moved into construction in July 2019, which continued over the course of calendar years 2020-2021. Staff worked with the MassDOT and VHB to oversee the construction process. The project was substantially complete by the end of FY 2021 (FFY 20) and final punch list items, survey work and landscaping were completed in FY 22 (FFY 21). The Washington Street/Rt. 9 corridor near Brookline Village is much safer for pedestrians and bicyclists because of enhanced crossings and protected bicycle accommodation and more livable because of substantial hardscape/landscape improvements and additional green space.

Affordable Housing: Brookline's policies and programs reflect a commitment to create and preserve rental and affordable housing. Staff coordinated with the Brookline Housing Authority on funding and permitting of a new housing development to be built on the Colonel Floyd site, a senior housing property on Marion Street. The Town allocated CDBG funding for capital projects at properties owned by the Brookline Housing Authority and Housing Staff continued to work with the BHA to support the preservation and expansion of its federal public housing portfolio through HUD's RAD program. For new development, Staff continued to work toward the redevelopment of the Kent/Station St. municipal parking lot for affordable senior housing, working with a Negotiation Committee to review the project's financial needs and to make a recommendation to the Select Board on whether to engage a site developer. Finally, the Town will continue to work with the Brookline Improvement Coalition to use CDBG funds to implement capital projects at a six-unit affordable housing complex.

Public Services: The Town continued to make public services a high priority. The Town's CDBG-funded programs serve a diverse population and provide many services, ranging from employment resources to counseling and literacy. Programs serve youths, elderly, ESOL clients and those needing with job search and readiness skills. Due to the COVID-19 pandemic, the BCCMH oversaw the continued use of CDBG and CDBG-CV dollars to address emergency housing and subsistence needs of those affected by the pandemic.

Supportive services to the homeless and at-risk of homeless: In FY 22, the BCCMH was awarded ESG funds to provide homeless prevention, rapid re-housing, outreach, and shelter to individuals and families that were homeless or at-risk of homelessness. BCCMH also received CDBG funding for multi-service child and adolescent programs that provide short term emergency shelter, transitional housing, to provide case management and/or financial assistance to individuals and families who are homeless or at high risk of eviction and who meet income guidelines. In FY 2022, CDBG-CV funds received through the CARES Act and CDBG funds helped to expand BCCMH’s capacity to assist residents affected by the pandemic.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee’s program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Administration	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Other	Other	0	0				
Affordable Housing - Rental Preservation	Affordable Housing	CDBG: \$	Rental units rehabilitated	Household Housing Unit	20	0	0.00%			

Affordable Housing - Rental Preservation	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	0	0		60	0	0.00%
Affordable Housing - Rental Units Constructed	Affordable Housing	CDBG: \$	Rental units constructed	Household Housing Unit	24	0	0.00%			
Affordable Housing Rental Preservation - BHA	Affordable Housing Public Housing	CDBG: \$	Rental units rehabilitated	Household Housing Unit	100	0	0.00%	100	0	0.00%
Economic Development	Non-Housing Community Development	CDBG: \$	Businesses assisted	Businesses Assisted	20	14	70.00%			
Homelessness Services	Homeless		Homelessness Prevention	Persons Assisted	600	0	0.00%			
Public Facilities / Public Improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	10000	0	0.00%			
Public Services	Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$ / Private: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	4000	421	10.53%	4000	421	10.53%

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

In FY 2022 the Town addressed the priorities and objectives set forth in its FY 2022 AAP. Planners focused on creating and preserving affordable rental and ownership housing by working with the Housing Advisory Board (HAB) and Select Board to channel Town-controlled resources into development and preservation projects. Staff assisted households with incomes ranging from extremely low- to upper-moderate.

Staff continued to coordinate with the BHA on new housing at its Col. Floyd site. Col. Floyd, a senior property on Marion St, will be redeveloped to both replace 60 units and to add approximately 55 new low-income senior rental housing units. Currently, the Col. Floyd project has received its comprehensive permit through the 40B process. Staff worked with Hebrew Senior Life on the redevelopment of

Staff worked with the BHA on its multi-year preservation initiative to take advantage of HUD's RAD program, federal/state tax credits and state/local subsidies. These resources will be used to rehab and preserve nearly 500 units of public housing in six different properties. The second RAD project at the Morse Apartments commenced in 2020 and a number of units/ common space is undergoing renovations. The Town committed \$1.3 from HOME and Housing Trust in 2020. This project will address repair needed for the long-term residents' ability to age in place. Rehab needs are projected to a total of \$19,377,660. All 98 revenue-producing units will be restricted to residents earning no more than 60% of AMI. There will be three floating HOME-assisted units with an allocation of \$452,927 in HOME funds. Staff worked with the BHA in FY 22 to move forward with its next RAD project at Sussman House.

The Town of Brookline will continue to process applications for comprehensive permits (40B) despite reaching the safe harbor status, and implement its Inclusionary Zoning Bylaw, which will result in a significant number of new affordable housing units serving households below 50%, 80%, and 100% of AMI, over the next several years. Additional funding streams such as the Community Preservation funds and a real estate transfer tax may increase funding availability for new affordable housing development projects.

Staff worked with a Negotiation Committee to review proposals for the reuse of the Kent St. municipal parking lot for affordable senior housing. In July 2020, the Select Board voted to authorize a negotiation committee to work with 2Life Communities, the developer chosen through the evaluation process, to determine if the parties could reach agreement on terms to redevelop the parking lot. The committee continued its work into FY 2022; Town staff continued to seek other state/federal resources for the project, including MassWorks and American

Rescue Plan funds. The Town is currently exploring offsite parking options to reduce the project's construction cost.

Staff worked with for- and non-profit agencies to preserve existing affordable rental housing and to the create of new units. In FY 2022, staff administered +/- \$312,000 in CDBG funds for capital projects at to the High Street Veterans development to install mechanical bathroom fans. In addition, planners administered \$59,000 in CDBG funds to the Brookline Improvement Coalition (BIC) for capital projects at its Boylston Street property to address much-needed roofing replacement.

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CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	CDBG
White	14,170
Black or African American	6,472
Asian	8,181
American Indian or American Native	7
Native Hawaiian or Other Pacific Islander	15
Total	28,845
Hispanic	233
Not Hispanic	683

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

Due to the pandemic, public services providers saw an influx in the number of clientele seen. The Brookline Food Pantry was new activity funded over the course of the pandemic. The food pantry was initially funded through the CDBG-received through the CARES Act. The number of clients above reflects the low- to moderate-income persons who were assisted through public service projects. HUD waivers allowing the Town to fund public services above the 15 percent threshold was a major reason for the great increase in clients served number over last year. This year service providers were able to serve 4,369 persons of “other” race, e.g. multi-racial clients.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	1,427,307	1,369,478
General Fund	public - local	177,183	177,183
Housing Trust Fund	public - local	0	0
Other	public - federal	1,387,667	849,567
Other	public - local	1,387,667	849,567

Table 3 - Resources Made Available

Narrative

Note: available resources were not fully expended due to a number of cancelled and/or postponed projects due to COVID-19 restrictions.

The Town continues to find that the best way to maximize the formula grant funding it receives (CDBG and HOME) is to utilize these funds to leverage other local foundations, state, federal and private dollars along with the Housing Authority's contributions. The figures above reflect the Town's ability to participate in and to encourage grantees to leverage significant resources far and above the amount of Town-administered federal funding. Of the amount expended \$ 8,244.58 in Program Income and \$ 1,370,667 in CDBG funds. Of the other funds expended \$849,566.63 were the CARES Act (CDBG-CV funds) used to combat the COVID-19 pandemic.

Public services leveraged upwards of \$ 700,000 in non-CDBG funding to run their programs including: private, state, foundational/philanthropic and other sources. While not an exhaustive list, leveraged funding includes individual giving, proceeds raised through charitable events, in kind resources, Brookline Community Foundation grants, Rotary Club grants, and contributions from public and quasi-public agencies such as the Mass. Dept. of Mental Health, MA DHCD and Brookline Housing Authority.

Leveraged funds for non-public service (housing and public facilities) activities include the Brookline Housing Trust and a project match from capital reserves by a non-profit affordable housing owner.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description

Table 4 – Identify the geographic distribution and location of investments

Narrative

There is no specific geographic distribution of federal funds or resources within the Town. Activities that receive Town-administered resources, including federal funding, have received commitments because the project met a local need and will achieve a strategic goal as set forth in the Consolidated Plan and current Annual Action Plan.

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Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

HUD encourages entitlements to maximize the impact of CDBG funds by utilizing federal dollars to leverage other resources and investment. The Town stresses the importance of leveraging when funds are awarded to grantees. Applicants understand that program sustainability is an important criterion to the Town, and grantees receive favorable consideration for award if their programs and projects leverage additional resources. Depending on the nature of the project, CDBG funds and HOME funds have helped grantees access Housing Trust funds, Town CIP dollars and other private funding from lending institutions and foundations.

The Town committed \$9.9 million in CDBG, HOME and Housing Trust Resources in mid-FY 22 for a BHA-sponsored 40B and another 40B sponsored by Hebrew Senior Life.,. Col. Floyd, a BHA property on Marion St, will be redeveloped to replace 60 obsolete senior housing units and to add 55 new low-income senior rental housing units. In FY 22, the BHA continued to seek a comprehensive permit through the 40B process. It is expected that the Town's \$6.525 Housing Trust commitment will leverage \$35 million (est.) in other public and private resources as the project moves toward closing. Hebrew Senior Life received its comprehensive permit along with a \$3.375 million Town commitment for its 108 Centre Street project. As with every Town-sponsored housing project, the Town's investment leverages significant public and private resources – including low income housing tax credits, state-controlled resources, private funds and developer equity.

In FYs 20-21, the Town provided the BHA with access to \$400,000 in revolving loan funds via the Housing Trust, which has been used to fund predevelopment expenses for RAD projects at the O'Shea and the Morse Apartments. It is expected that the Town/BHA and partnership funds will continue to support future RAD applications, which will lead to the rehab of hundreds of affordable units and, potentially, the creation of new affordable units. The Town will continue to use CDBG/HOME dollars to facilitate these projects, as it did with the Morse project in FYs 21-22 where three floating HOME-assisted units were created with an allocation of \$452,927 in

HOME funds.

Requests for public services funding are 2-3 times more than the Town can provide due to the 15% cap. Time and again, agencies have met these funding challenges by leveraging resources for their programs, which in FY 22 was at almost a 4 to 1 ratio. CDBG funding allocated for public services in FY 22 was +/- \$205,000 with upwards of \$1,000,000 expended as matching funds for public services.

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CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	0	7
Number of Special-Needs households to be provided affordable housing units	0	0
Total	0	7

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	0	7
Number of households supported through Acquisition of Existing Units	0	0
Total	0	7

Table 6 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

Projections for affordable housing development do not always align with the realities of aligning public resources needed to advance affordable housing development and rehabilitation projects. There are instances, such as in the Kent Street Project, where Town funding is limited and falls short of a developer's subsidy needs, especially for projects that provide a substantial number of affordable units. In an instance such as this, The Town cannot commit funding until such time that there are adequate resources available, which hinders a developer's ability to compete for scarce public resources

at the state level and to seek private resources. The Town's early commitment is critical to the project developer seeking and receiving other subsidies. For this reason, there can be significant gaps between the time when the Town has adequate funds to commit and when the project moves to its construction phase.

Overall, however, with the assistance of CDBG funds, the Town was able to meet other affordable housing goals in the nearer term by funding capital projects undertaken by the Brookline Housing Authority and the Brookline Improvement Coalition - whose capital project was back on track after being postponed due to the pandemic. While the funds were committed to the BHA and BIC, these rehab projects were significantly affected by the pandemic due to supply chain issues and out of an abundance of caution for tenants, and construction was delayed for much fiscal year 21.

Discuss how these outcomes will impact future annual action plans.

Funding commitments to projects that take a number of years to move to loan closing and construction often prohibit the Town's ability to fund new projects, which can affect projections about the number of units to be renovated or produced in the Town's Annual and Consolidated plans. The Town must work closely with developers to whom funding commitments have already been made before it can commit to other projects in the development pipeline.

To meet the needs of seniors, the Select Board appointed a committee to explore the redevelopment of a Town-owned parking lot for affordable senior housing. The Committee met eight times in FY 20 to explore potential for development of the site, including two public meetings. The Select Board, who authorized the distribution of an RFP for the disposition of the site, which was released in July 2019. The RFP led to a number of developer proposals, but Town funding will need to be committed early on and the development of the project could be years after the Town's initial commitment. Over the course of FY 2021 and FY 2022, staff performed due diligence necessary for the eventual sale of the land, including a Phase I ESA, survey work and an appraisal. A negotiation committee began preliminary negotiations with 2Life Communities, whose proposal was shortlisted for the Kent St. site. This project will be successful if the Town can commit funding early in the process and, like other affordable housing projects, the developer can leverage other public and private resources.

Aside from Town-sponsored projects, the Town continues to experience tremendous development pressure -- with a number of developers planning to build additional housing units. There are currently 22 Ch 40B developments before the Town in various stages ranging from early planning to final permitting and construction. The Town will have at least three projects to administer under Inclusionary Zoning in addition to the numerous 40B development proposals, most of which will produce between 15

and 25 percent affordable units. These projects could produce a significant number of affordable units for the Town and the total number of affordable units in the pipeline could significantly surpass the projections in the Five-Year Consolidated Plan for this reason.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	0	0
Low-income	0	0
Moderate-income	7	0
Total	7	0

Table 7 – Number of Households Served

Narrative Information

A number of LMI persons served through the CDBG program reside in developments owned and operated by the Brookline Housing Authority. The BHA plays a key role in providing affordable housing in the Town of Brookline. In FY 22, the BHA was able to complete CDBG capital improvements delayed due to a construction moratorium during the Coronavirus Pandemic and were able to undertake other projects funded with FY 22 CDBG funding.

The accomplishments of the BHA are detailed more in section CR-30.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

The City of Newton, lead agent of the former Brookline-Newton-Waltham- Watertown Continuum of Care (BNWW CoC), continued its partnership with the MA Balance of State (BoS) CoC and the U.S Department of Housing and Urban Development. The merger has provided an opportunity to capitalize on existing administrative resources and, subsequently, former BNWW CoC agencies integrated within the BoS Coordinated Entry System.

The BoS-Coordinated Entry System provides a mechanism for housing the most vulnerable persons first, effectively focusing resources on those with the greatest need. Each provider within the CoC is able to conduct a comprehensive assessment of an individual, make the appropriate referral(s) to efficiently connect them with safe housing and/or the appropriate services, design individualized strategies accordingly and better understand homelessness in the Continuum and across the Commonwealth.

Addressing the emergency shelter and transitional housing needs of homeless persons

Although there is a clear need and benefit of providing the shelter services, the BoS continues to support programs that create housing stability and economic mobility as a means to end the need for shelters. In FY22 (FFY21), three subrecipients were awarded Emergency Solutions Grant (ESG) funds to provide homelessness prevention, rapid rehousing, shelter services to individuals and families that were homeless or at-risk of homelessness, including the Brookline Community Mental Health Center.

In FY22, the Brookline Center for Community Mental Health operated both Homelessness Prevention and Rapid Re-Housing Programs, providing case management and/or financial assistance to individuals and families who are homeless or at high risk of eviction and who meet income guidelines and who live in Brookline, Newton, Watertown and Waltham. In the last year, BCCMH served numerous individuals in its Homelessness Prevention Program and Rapid Re-Housing programs.

In addition, BCCMH subcontracted with the Brookline Housing Authority to house homeless families in BHA apartments and provided case management and support to help them become stably housed.

In each of these programs, BCCMH uses a Housing First model to help families and individuals stabilize in or relocate to affordable housing, and become active, productive participants in the community through work, educational and social activities. BCCMH's Case Managers work intensively with families and individuals who are homeless, court involved and facing imminent eviction, or at high risk of eviction to help them negotiate agreements with their landlords, guide them through the court process, secure more affordable housing if needed, create and maintain realistic budgets, and gain employment and emotional stability.

For those in the Rapid Rehousing Program, case managers initially focus on housing search and determining the needs of each applicant. Again, case managers assist participants in identifying affordable housing, completing housing and Section 8 applications, and working with landlords to ensure timely move in. While working with these participants to locate permanent housing, staff offer information about and referral to emergency shelter, for those not currently sheltered.

The Center also currently administers the Safety Net Fund along with the Brookline Community Foundation. Safety Net provides emergency financial assistance to low-income Brookline residents in need, helping with basic expenses such as rent, utility shutoffs, medical bills, transportation, and food. In calendar year 2021, which encompasses part of CDBG FY 2022, the BCCMH Safety Net program continued to receive an elevated number of emergency inquiries from community members.

In FY21, the Massachusetts Department of Housing and Community Development (DHCD), the lead agency for the BoS CoC, conducted a region-wide needs assessment to obtain feedback from providers, direct care workers, and constituents regarding housing needs within the Brookline, Newton, Waltham, Watertown area. The assessment will culminate in a report that will inform future strategies and the allocation of resources for at-risk individuals and families.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after

being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

Following the previous merger of the BNWW CoC with the BoS CoC, efforts were quickly undertaken to ensure integration into the BoS Coordinated Entry System. Comprised of over 80 communities, the BoS provided the BNWW CoC with access to the many agencies already established within the BoS. The merger effectively maximizes and expands existing regional resources to better connect at-risk individuals and families with information, referrals and assistance.

The Continuum continued to strengthen engagement of participating stakeholders, as well as reaching out to new partners who would advance the promotion of housing stability, particularly among low-income veterans and their families who are homeless or at risk of homelessness. At the local level, the Brookline Center for Community Mental Health, as noted above, was able to assist clients via its Homelessness Prevention Program and Rapid Re-Housing programs, working with local partners such as the Brookline Housing Authority and the Brookline Community Foundation.

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

Brookline worked to implement its Housing Production Plan (HPP) to exceed the Chapter 40B 10 percent goal of affordable housing stock. In FY 2022, Town staff continued its work with the Select board-appointed Kent Street/Station Street Committee and assisted a committee with a subsidy negotiation for the reuse of the site. Over the course of FY 2022, the Committee met numerous times to review project subsidy assumptions, to negotiate with the developer team and to make a recommendation on next steps. As of winter 2022, the committee recommended that the Town work to address parking assumptions and costs to move the project forward. Town meeting supported looking at off-site parking as a potential alternative.

Strategies to retain and possibly increase lodging house stock in Brookline (often SROs), occupied by very low-income persons will continue to be explored through partnerships with Pine Street Inn, Caritas, and Communities to End Homelessness. As with the recent Pine Street Inn Beals Street project, the Town's goal is to purchase and renovate lodging houses in the pursuit of creating permanently affordable housing.

Collaboration continued with McKinney-Vento local educational authorities and school districts during FY22. The Brookline Center for Community Mental Health contacts each school district homeless liaison at least once a week to discuss families or youth that may be at risk of homelessness and need prevention intervention.

To assure that homeless veterans have better access to services and housing, the New England Center for Homeless Veterans has assigned its Housing Stabilization Operations Coordinator to the BNWW region. The coordinator works with local providers to identify the few homeless veterans in the BNWW region to ensure they are connected to VA services.

- HEARTH operates the Ruth Cowin House Permanent Housing (PH) Program which has 8 units for formerly homeless elders.
- Pine Street Inn operates a PH at 1754 Beacon Street for 13 formerly homeless persons.
- Pine Street Inn operates a PH at 51-57 Beals Street for 30 formerly homeless persons.
- Pine Street Inn operates the Brookline Rental Assistance for the Chronically Homeless PH in partnership with the Brookline Housing Authority. The project is designed to serve 4 persons.
- Pine Street Inn operates Jenks House PH at 1043-1045 Beacon Street for 24 formerly homeless persons.
- Pine Street Inn operates the Sarah Wallace House PH at 1017 Beacon Street for 16 formerly homeless persons.
- VinFen operates the Brookline Supported Housing Leasing PH for 2 formerly homeless persons.
- Family Aid Boston operates a family shelter in Coolidge Corner at 32 Centre Street, which serves 35 families/100 children and parents.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

The Brookline Housing Authority (BHA) plays a key role in providing affordable housing in the Town of Brookline. It provides the largest number of affordable apartments of any property owner in the Town (approximately 47% of all affordable units throughout Brookline). It is the mission of the Brookline Housing Authority to provide low-income families, seniors, and people of all abilities with safe, decent, and affordable places to live in a community rich with opportunities. The BHA works in collaboration with government and civic organizations to support and encourage the well-being and economic self-sufficiency of BHA residents; to sustain a diverse population in Brookline; and to maintain modern neighborhoods. The BHA was able in FY 2022 to move forward with the following CDBG capital improvements: Installation of mechanical bathroom fans at High Street Veteran's development (FY 2022 CDBG funding). A contract was awarded to a contractor in June 2022 and is expected to be complete by the end of the year.

Beyond housing, the BHA continues to invest in comprehensive service model to strength the lives of residents, including the following initiatives:

- Launched the Self Sufficiency Program (SSP), providing comprehensive pathways for residents with limited incomes to develop their skills, increase earning power, and build assets for economic resilience.
- Partnered with the Brookline Center for Community Mental Health to newly structure and expand a clinical care team to include a full-time equivalent licensed clinician to provide accessible mental health and tenancy preservation services.
- Partnered with Springwell Inc to provide site-based care coordination, socialization opportunities, and daily meals for seniors and persons with disabilities at all of BHA's senior properties.
- Collaborated with the Town of Brookline and other partners to launch Tech Buddies, providing free tablets, Internet access, and technology education to low-income seniors and persons with disabilities across Brookline and the BHA portfolio.

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

Within the BHA, there has existed the Town-Wide Resident Association, an elected body, with representatives from BHA public housing developments. The BHA has encouraged when active the president to hold various meetings throughout the year to foster resident participation. At the BHA Board of Commissioners meetings, the TWTA president and/or other association officers have represented the views of the resident population as a whole and when there is no TWTA the BHA allows open public comment at all meetings with resident comments received first. The Resident Association

was established in the 1960's to support positive change within the Housing Authority. This association has supported the BHA's efforts to create and maintain the highest quality of housing for the residents it serves, as well as strengthen social service programming and self-sufficiency opportunities.

When homeownership opportunities have been promoted, the Town's Planning Department alerts the BHA about this, and the BHA publicizes these opportunities to the residents. The BHA is among a handful of housing authorities to receive a Department of Housing and Community Development (DHCD) self-sufficiency grant. Beginning in FY 2021, together with support from CDBG, the BHA was able to initiate employment, education, and financial coaching along with escrow savings accounts for 35 households to help build wealth amongst BHA residents.

Actions taken to provide assistance to troubled PHAs

The Brookline Housing Authority has not been designated a "troubled PHA". As such, no actions are required to assist it in that realm.

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CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken 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. 91.220 (j); 91.320 (i)

The Town of Brookline continues to explore strategies and revisions to its zoning by-law to increase housing production and affordable housing outcomes.

Despite reaching the 10% subsidized housing inventory threshold, the Town undertook an update of its 2016 Housing Production Plan in FY 22, An (HPP) is a community's proactive strategy for planning and developing affordable housing. The consultant team hosted numerous focus groups and the Town held three public forums with translation services available. It is expected that the plan will be submitted to DHCD in FY 23 after local approval.

The Town continues to review and update its inclusionary zoning by-law to maximize the number of affordable units provided onsite and to expand thresholds at which developers must contribute to the Town's Affordable Housing Trust. IZ language related to local preference was also reviewed as part of the WestMetro HOME Consortium's update to its Analysis of Impediments to Fair Housing Choice (AI) report. Brookline, a member of the WestMetro HOME Consortium, reduced its local preference requirement from 70% to 25% in July 2020. The reduction in local preference has encouraged a more diverse applicant pool as developers or Town staff conduct housing lotteries.

The Town adopted the Community Preservation Act, a surcharge on real estate tax bills that can be used toward the creation and preservation of affordable housing. Local CPA revenue is matched by the state's Community Preservation Trust Fund. Money for the CPA state match comes from fees and taxes paid by residents and business firms in every city and town, including Brookline. Brookline's surcharge is structured in such a way that low/moderate-income households are entitled to apply for exemption from the surcharge. CPA funds will play a role in increasing the likelihood of affordable housing production in Brookline. CPA funds, combined with CDBG, HOME and Housing Trust funds, will provide another source of subsidy for affordable housing developers. A CPA Committee is currently being formed to oversee and recommend the use of the funding.

The impact of high taxes on the cost of owning property in Brookline continued to be partially mitigated

for owner occupants through a residential exemption. The residential exemption is a dollar amount of value that is exempt from taxation. For example, in FY 2020, a qualified homeowner eligible for a residential exemption will have \$292,060 deducted from the property's assessed value for purposes of calculating the tax bill. The Town continues to work with affordable condominium buyers to take advantage of these tax savings when seeking financing. In addition, the Town will continue to subscribe to several State-authorized measures to provide tax relief for homeowners who are low-income, seniors, surviving spouses and children, veterans, and/or blind.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

Housing Division staff continued to work with other Town departments, public and private affordable developers, and local private agencies to both assess housing needs and to serve those who need housing services.

During FY 21, staff maintained their support for working with developers to meet the needs of the underserved. Housing and Community Development staff will continue to work with the Brookline Housing Authority to accomplish the preservation of its housing stock through the provision of CDBG and HOME funds for capital improvements, and to access Town and state-controlled project-based subsidies for projects under development. Starting in FY19 and continuing into current fiscal years, Staff will assist with the BHA's multi-year Strategic Preservation Initiative to take advantage of HUD's Rental Assistance Demonstration Program as well as federal and state tax credits and state and local subsidies to rehabilitate and preserve nearly 500 units of affordable public housing in six different properties.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

The Town continued to reduce the risks of lead-based paint poisoning both for publicly funded properties, as well as in private housing by referring all required lead inspections and complaints to the MassHousing "Get the Lead Out " Program. The Health and Building Departments also ensure that contractors followed the EPA Renovation, Repair, and Painting Rule (RRP Rule) entailing safe work practices when working in residential properties built before 1978.

According to the Massachusetts Department of Public Health Childhood Lead Poisoning Prevention Program, 1,432 (62%) of Brookline children under the age of four were screened for lead poisoning during calendar year 2019, which is the most recent dataset. Of that number, one child was confirmed

to have elevated lead poisoning levels over the 10 micrograms per deciliter limit established by the State Lead law. This is significant given that 86 percent of the Town's housing stock was built before 1978.

The town does not have a Lead program but whenever there is rehabilitation or renovation to buildings in the town that may have lead related issues, they are referred by the housing division to the MassHousing "Get the Lead Out " Program.

The Housing Division continued to act as the authorized processing agency for the MassHousing "Get the Lead Out", a low-cost loan program for lead removal. The program provides zero to two percent financing to owners of buildings with one to four units. This includes owner occupants whose incomes fall under certain low- and upper-moderate income limits and investor/non-profit owners who serve income-eligible tenants. The Town does an initial eligibility determination, assists the borrower in completing the loan package, and then assists the borrower in the lead abatement process required under Massachusetts State Law. However, while the Division receives inquiries the usefulness of this program in the Town is limited due to the high proportion of condominium and rental units that are in relatively large buildings where access to common area testing and abatement may be more complicated. Some have even found the program daunting due to elements involved in the process. In addition, as housing costs continue to go up, many households do not meet the income eligibility standards set for this program.

Collaboration will continue between the Planning and Community Development Department, the Health and Building Departments to disseminate information and resources available to at-risk populations and key stakeholders.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

One of the most challenging issues facing households living below the poverty line in Brookline is the high cost of rental housing. Brookline continues to work to provide housing opportunities for very low-income households earning less than 30 percent of area median income. As in prior years, the Town used CDBG funding to support capital improvements at properties owned by the Brookline Housing Authority (BHA) as well as Housing Trust funds to for the BHA's RAD preservation initiative.

The Town supports a number of programs through the CDBG program, particularly public services focused on benefitting low- and moderate-income households, including programs like Steps to Success, Next Steps, the BHA's ESOL program and the Brookline Community Mental Health Center's comprehensive case management services. These programs and agencies have created programs needed to meet the ever-growing need of very-low income households to help them address quality of life issues.

The Town's Steps to Success (STS) program, with a mission to end generational poverty one student at a time, assisted low-income public-school students with year-round academic support and summer training experiences. The BHA, in conjunction with STS, sought to engage residents of the Town who experience language barriers by providing ESOL classes. The program engaged partner agencies as a core aspect of its mission for a comprehensive, community-based approach to adult learning in Brookline.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

Housing and Community Development staff continued to collaborate with a number of Town departments, including the Health Department, who enforce health and sanitary codes and provide oversight in the area of lead paint and asbestos issues, as well as permitting for lodging houses. Collaboration continues with the Brookline Center for Community Mental Health, a stakeholder in the former Brookline-Newton-Waltham-Watertown (BNWW) Continuum of Care (C of C) before the move to balance-of-state. In particular, staff continues to work with BCCMH staff in administering CDBG and CDBG-CV funds to assist with housing insecurity. As a recipient of Emergency Solutions Grant (ESG) funding, BCCHC provides services to the four former Continuum of Care communities with homeless prevention programs. Lastly, Housing staff continued engagement with the Town employees, including the Veteran's office and School Department personnel, in promoting new affordable housing opportunities.

Town Staff continue to collaborate and liaise with the former BNWW C of C communities in order to inform policies and strategies to ensure homeless individuals and families receive needed services and move into permanent supportive housing.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

The Brookline Center for Community Mental Health and the Town's Diversity, Inclusion and Community Relations Department provide on-going case management to households that are homeless or at risk of being homeless, and links them to specific needed resources such as the Brookline Safety Net (providing short term emergency cash assistance which is available from the Brookline Community Foundation), and/or government entitlement programs such as fuel assistance, Section 8, public housing, SNAP benefits, and MassHealth. All mainstream resources are sought by public, private housing and social services agencies since they continue to collaborate to help meet the needs of vulnerable populations.

The Town continued to collaborate with the BCCMH, the BHA and the Brookline Food Pantry, prioritizing the use of CDBG-CV funding to ensure that the those affected by the pandemic would have housing security and consistent access to food at the Brookline Food Pantry and through the Council on Aging.

With a limited pool of ever-shrinking resources available to these and other agencies, the most efficient way to meet the on-going needs of different populations is to foster collaboration among public, private, and social service agencies. Subrecipients of the grant are encouraged to share their respective expertise to benefit their peers, and there is an ongoing history of regular meetings among Town agencies to discuss collaboration and coordination of resources. As the Town prepared for its FYs 21-25 Consolidated Plan, significant attention was given to the ongoing need for public services and how they could be best integrated into specialized housing models.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

In FY20 the WestMetro HOME Consortium continued to advance the actions and strategies identified in the WestMetro HOME Consortium Regional Fair Housing Plan. In FY 21 and beyond, Brookline will work closely with the Consortium to implement the recommendations from the FYs 2020-2025 Analysis of Impediments to Fair Housing Choice (AI), a five-year plan that analyses barriers in access to housing opportunities throughout the twelve member communities and identifies priorities and goals to address these issues.

Each community in the consortium also works individually to promote fair housing and overcome impediments. Brookline works with the Commission on Diversity, Inclusion, and Community Relations to promote fair housing. The Commission's mission is to support a welcoming environment by encouraging cooperation, tolerance, and respect among and by all persons who come in contact with the Town of Brookline by advancing, promoting and advocating for the human and civil rights of all through education, awareness, outreach and advocacy.

The Housing Advisory board promotes the production and preservation of housing affordable to low-, moderate-, and upper-moderate income households. One of the goals of the board is to make recommendations to the Planning Board and Zoning Board on affordable housing needs, policies and programs. Many of the policies are in alignment with the oversight of federal and state fair housing laws.

As noted, staff started the process to update Brookline’s Housing Production Plan in FY 21, issuing an RFP to procure a consultant. Work continued into FY 22. The HPP will provide a strategic five-year plan to produce market and affordable housing.

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CR-40 - Monitoring 91.220 and 91.230

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

HOME: HOME-funded projects in Brookline require on-site inspection is required every two years. Housing staff completed its Housing Quality Standards (HQS) HQS inspections in FY 2022. Tenant re-certifications are done on an annual basis, and took place in fiscal year 2022 as well.

Additionally, all homeowners who have received financial assistance through the Homebuyer Assistance program (or have deed restrictions under the Town-sponsored programs) are monitored on an annual basis to verify continued owner occupancy. The Brookline Homebuyer programs require that all units purchased with HOME funds remain buyer-occupied throughout the term of the mortgage. Each buyer is contacted by certified mail with a return receipt request. The owner must sign and return an enclosed certification that s/he still occupies the unit as his/her primary residence and that s/he is in compliance with all terms, conditions, and requirements set forth in the mortgage and promissory note.

Owner occupancy is also confirmed through an Assessor's Office determination that the owner continues to qualify for the Town's residential exemption, and through review of annual Town-generated street listings. If a unit is found to be out of compliance, Housing Division staff will work with Town Counsel to initiate foreclosure and recapture the unit. All current participants continue to comply with the requirements under the program regulations.

CDBG: The Town offers technical assistance to subrecipients in the first quarter of the fiscal year and as needed over the course of the Year. The Town monitors recipients early within the third quarter of the program fiscal year. If risk analyses dictate the on-going program review is necessary, ongoing monitoring is undertaken. After offering technical assistance early in the fall of 2021, there were no programs deemed to be at risk and no remediation plans were implemented. However, the pandemic held up a number of projects that would have moved forward and staff was in continued contact with grant recipients about revised program schedules – which were met.

Initial technical assistance meetings with subrecipients helps staff to evaluate programs and to identify issues to determine if ongoing technical assistance is needed. These initial meetings help expedite

monitoring when it occurs later in the fiscal year, particularly with public service subrecipients, who are required to submit income eligibility documentation for review prior to the first invoice.

Subrecipients whose projects involve Davis-Bacon labor standards are sent -- prior to the execution of their contract -- a communication stating their requirement to administer and enforce federal labor provisions. The latest edition of "Making Davis-Bacon Work - A Contractor's Guide to Prevailing Wage Requirements for Federally Assisted Construction Projects-2012" (prepared by HUD) is sent to recipients in electronic copy. Staff meet and discuss/clarify these requirements with project managers as needed.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

Program regulations mandate citizen participation throughout the fiscal year as well as notification on specific documents or actions. Since there is no longer a print version of the *Brookline TAB, staff used e-mail, social media, community bulletin boards and postings in public buildings to* inform members of the Brookline community of the opportunity to comment on the FY 2022 Consolidated Annual Performance and Evaluation Plan (CAPER). Beginning September 13 to September 30, 2022, the term of the 18 day comment period for this report, XXXXX comments were received (to be updated)..

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 provide contact information to the Town's Office of Diversity, Inclusion and Community Relations.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

During the course of FFY 21 (FY 2022) and continuing into FFY 22, and as highlighted in sections CR-05, CR-25, CR-30 CR-35 and CR-40, public facilities, public services and housing activities were affected by the pandemic. With public services, a great emphasis was given to using CDBG and CDBG-CV funds to augment local programs that serve those in jeopardy of losing their homes or for those who had food

security issues. Some of these activities that had lagged behind in their expected start or completion dates were able to resume and complete their projects or activities.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

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CR-58 – Section 3

Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
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Table 8 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA	HTF
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Table 9 – Qualitative Efforts - Number of Activities by Program

Narrative

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