



Fourth Program Year Action Plan

The CPMP Fourth Annual Action Plan includes the [SF 424](#) and Narrative Responses to Action Plan questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. The Executive Summary narratives are optional.

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Narrative Responses

GENERAL

Executive Summary

The Executive Summary is required. Include the objectives and outcomes identified in the plan as well as an evaluation of past performance, a summary of the citizen participation and consultation process (including efforts to broaden public participation) (24 CFR 91.200 (b)), a summary of comments or views, and a summary of comments or views not accepted and the reasons therefore (24 CFR 91.105 (b)(5)).

Program Year 4 Action Plan Executive Summary:

Executive Summary Response: Include the objectives and outcomes identified in the plan

The general local consensus as revealed at various points in the continuing process of consultation is centered on constant themes:

1. The need for a greater supply of affordable ownership and rental housing units
2. While much has been done to increase the number of emergency shelter, supportive/transitional and ultimately permanent units for homeless individuals and families as well for special needs populations, substantial need remains among the lower-income population in Brockton - even as Brockton's ten year plan to end homelessness (April 2, 2008) and multi-party efforts continue seeking to reach established goals.
3. Supportive social service needs remain high as Brockton's wide network of nonprofit agencies works hard to meet them.
4. The revitalization and stabilization of targeted low and moderate income neighborhoods remains a high priority
5. Modernization of aging infrastructure to support neighborhood stabilization and preservation is a constant need
6. Economic development efforts through several initiatives remains of significant importance to the City of Brockton, not only as a means to create jobs and reduce unemployment but also because it is essential if Brockton is to broaden the tax base and lower the tax burden on working persons and families.

The CDBG funds which are expected to be \$1,656,407 for the next year, are managed by the Brockton Redevelopment Authority [BRA]. All of the census tracts in Brockton in 2000 were more than 50% low and moderate income. Thus the BRA has chosen to distribute funds based solely on needs that have been prioritized by the City. There is no geographically based allocation.

The HOME funds are expected to be \$850,000 for the next year and are managed by the Brockton Housing Authority [BHA]. The BHA has chosen to distribute funds based solely on needs that have been prioritized by the City.

The objectives that the City has established for the fourth year (2011-2012) of the five year plan are as follows:

First Objective – Preservation

The priority is to preserve what affordable housing there is, whether it is already subsidized by the government with expiring use restrictions, or whether it is unrestricted private market units occupied by and affordable to households with low incomes.

Strategies: The strategies to be used are:

- Maintain, support and preserve the existing housing stock;
- Prevent housing deterioration and vacancies;
- Prevent neighborhood deterioration due to foreclosures and vacancies through a variety of means including counseling.

Funded Projects:

1. Self Help, Inc. – Lead Abatement Program

The City of Brockton has been awarded \$2,100,000 from HUD's Lead Based Paint Hazard Control program to produce 125 units of lead safe housing to residents of Brockton. The city of Brockton will contract with Self Help Inc. to implement this program. In addition, the City of Brockton, through Community Development Block Grant funding has provided funding of \$50,000 in matching funds that will be available to assist 20 Brockton property owners with their share of abatement costs.

CDBG \$50,000

2. Homeowner Housing Rehab

The Brockton Redevelopment Authority will provide funding in the form of deferred payment loans to qualified low and moderate income property owners in the City of Brockton. The funds will be expended according to the scope of work to be completed and will not exceed \$30,000. For single family applicants, this will be an interest free loan for qualified applicants who meet income guidelines established by the U.S. Dept. of Housing and Urban Development. A lien will be placed on the property. Should the owner sell, refinance or transfer the property, the total amount of the loan must be repaid at 0% interest. No

properties with more than 2 units will be considered. At least 51% of the total units must be occupied by low and moderate income households.

CDBG \$342,270

3. NHS of the South Shore – First Time Homebuyer and Personal Financial Education Program

In an effort to deal with the causes and effects of the foreclosure crisis in Brockton, the BRA will partner with NHS to provide housing services to help stave off foreclosure and prevent displacement of tenants as well as homeowners. There are programs. One will support the foreclosure counseling services to Brockton residents. This program will allow the Brockton NeighborWorks Homeownership Center to offer Homebuyer Education Workshops. It is estimated that the program will educate over 350 potential homebuyers to become educated and successful homeowners. The second program is to provide Foreclosure Counseling services to residents who are at risk of losing their homes. Some will go through foreclosure, shortsale or deed-in-lieu. Others may save their homes by working with lenders through modification, repayment plan or forbearance. NHS intends to bring the most positive outcome possible for each client and help secure their financial future through education.

CDBG \$40,000

4. Self Help, Inc. – Landlord Training Program

Funding is to be used to conduct a Landlord Education Course to educate low and moderate income landlords and landlords to be of multi-family properties as to their duties and rights with respect to tenants. Training will focus on budgeting, maintenance, requirements of sanitary codes and the provisions of fair housing laws. The main objectives of the program are to educate landlords, reduce the number of vacant and abandoned property, provide successful home ownership and rentals to low and moderate income families and provide a healthy home environment. CDBG funds will be used to provide partial salaries to the program coordinator, consumables required for class attendees, contract with sub-grantees and continued program certification.

CDBG \$15,000

Second Objective – Production

This priority is to produce affordably restricted housing units that will be available to low income families for a period of time that meets or exceeds the required affordability periods based on the amount of investment in the properties.

Strategies: The strategies to be used are:

- Increase the overall availability of affordable permanent housing through the creation of new units and the return to habitable status of vacant/deteriorated units.
- Preserve the quality of life in existing neighborhoods while accommodating smart growth; support a well-conceived balance between housing development, transportation, open space and recreational

- facilities and appropriate commercial development opportunities.
- Housing Rehab loan programs that place affordable restrictions on rental units in owner-occupied multi-family properties throughout the City.
- Support organizations using NSP funds for foreclosed properties.

Funded Projects:

1. New Construction: Brockton Housing Authority

The Brockton Housing Authority (BHA) will utilize HOME funds to construct a duplex located at Plot 48-2 Tribou Street, as additional affordable housing opportunities in Brockton. BHA will acquire the property from the City of Brockton and construct the duplex with HOME funds and private financing and rent the apartments to low income tenants.

HOME \$176,000

2. New Construction: Station Lofts

Capstone Communities LLC will utilize HOME funds to redevelop the Knight Building located at 124 Montello Street into 25 units which will consist of affordable, workforce and market rate mixed income housing. Capstone Communities plans on utilizing HOME funds from DHCD and Brockton, DHCD tax credits and CATNHP funding and federal and state historic tax credit equity. Station Lofts is located in the heart of Brockton's downtown and is located in the Downtown Brockton Smart Growth Overlay District (DBSGOD) Downtown Core Sub-District. The site is one block from the MBTA Commuter Rail Station.

HOME \$100,000

3. Rental Development – Acquisition & Rehabilitation

The Brockton Housing Authority (BHA) will utilize HOME funds to supplement a commitment of \$2 Million in grants to the Brockton Housing Authority and Southeastern Massachusetts Affordable Housing Corporation (SMAHC) from the Massachusetts Department of Housing and Community Development (DHCD) and/or other financing sources to acquire and rehabilitate abandoned bank-owned, foreclosed two or three family buildings as additional affordable housing opportunities in Brockton.

HOME \$255,000

Third Objective – Increase access to homeownership for very low, low and moderate income households

Strategies: The strategies to be used are:

- Down Payment and Closing Cost Assistance to assist low and moderate income first time home buyers who are looking to enter the housing market and purchase their first homes.
- Support low and moderate income households who invest in older, more affordable housing stock in the jurisdiction through a purchase and rehab program.
- Housing counseling courses for low and moderate income households who are considering purchasing a property.

- Increase and expand current fair housing activities, including affirmative fair marketing, outreach efforts and translation of vital docs.

Funded Projects:

1. First Time Homebuyer Assistance

HOME funds to provide down payment assistance, and reasonable closing costs for eligible low/moderate income home buyers citywide. Recapture provisions are required calling for repayment on an annual declining balance basis if the property is sold within varying time periods keyed to the amount of assistance received.

HOME \$55,000

2. Southeastern Massachusetts Affordable Housing Corporation (SMAHC) (CHDO)

Southeastern Massachusetts Affordable Housing Corporation (SMAHC), a private non-profit entity, acting as the local CDHO, will utilize HOME funds to acquire and rehabilitate single family homes and sell them to low/moderate income families as additional affordable housing opportunities in Brockton. SMAHC will use CHDO proceeds from the sale of the CHDO developed homeownership units for HOME-eligible or other housing activities to benefit low/moderate income families.

HOME: \$166,000

Fourth Objective - Stabilization and Improvement of "At Risk" Neighborhoods

The overall strategy is to maximize intervention which addresses activities and events which can cause neighborhoods undergoing disinvestment to become more destabilized.

Strategies: The strategies to be used are:

- Support projects that stabilize foreclosed properties (or properties at risk of foreclosure) or low income households at risk because of loss of income and inability to service their mortgages or who are renting in properties at risk of foreclosure.
- Provision of better fire protection for housing by means of more and more effective fire equipment.
- Provision of more flexible police programs to reduce crime.

Funded Projects:

1. Brockton Police Department – Mobile Anti Crime Unit

A specially equipped and trained unit focuses on preventing crime by creating a high visibility profile and rapid response in areas frequented by known criminals. CDBG funds will provide partial funding to continue this mobile patrol. Four police officers make up two patrol cars assigned to census tracts 5104, 5108, 5109 and 5114.

CDBG: \$155,000

2. Brockton Fire Department

The Brockton Fire Department intends to purchase a new 1,500 gallon per minute pumping engine. This equipment would be located at Station 1 (42 Pleasant Street, census tract 5109) or Station 2 (945 Main Street, census tract 5116). This equipment is necessary to meet the emergency service needs of all residents of Brockton.

CDBG: \$450,000

Fifth Objective - Economic Development

The priority is to support activities which will enhance the income of low and moderate income residents and provide jobs for those who are unemployed.

Strategies: The strategies to be used are:

- Develop neighborhood business in low mod areas which will employ low and moderate income residents and enhance businesses owned by low and moderate income residents
- ???

Funded Projects:

1. Section 108 Programs for Downtown Development

This is the first repayment of the Section 108 loan of \$2,600,000 awarded by HUD for the rehab of the Adams Street Garage; economic development loans to Brockton businesses; the "ARRH" program which assists the City in addressing distressed vacant and abandoned properties through the court process.

CDBG: \$200,000

2. Arts in the Windows

Promote Economic Opportunity by making façade improvements affordable with low interest patient loans to small businesses in the downtown business district and possibly in other areas.

CDBG: \$25,000

Sixth Objective – Homeless and At-Risk of Homelessness Services

The priority is to intervene in situations which can lead to homelessness such as foreclosures and to develop permanent housing in place of temporary shelter for homeless families.

Strategies: The strategies to be used are:

- Information and referral services which will connect people at risk of homelessness with appropriate resources.
- Provision of training and other services to enable homeless people to become self-sufficient.

Funded Projects:

1. BAMSI (Brockton Area Multi Services Inc.) Helpline

Helpline is a program operated by Brockton Area Multi Services Inc., the local anti poverty umbrella organization serving the City of Brockton and surrounding areas. Helpline is an informational and referral resource that has for the past several years helped thousands of Brockton residents to locate services and assistance for a variety of needs. CDBG funds will be used to fund one (1) part time position for the Homeless Prevention Program that will assist low income households who are facing severe financial hardship which may jeopardize their housing.

CDBG: \$4,285

2. Father Bill's and Mainspring – Work Express Program

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

CDBG: \$8,461

3. Old Colony YMCA – Jon David Louison Family Center

The Old Colony YMCA provides two programs for families experiencing homelessness. The David Jon Louison Center serves 19 families (approximately 19 woman and 47 children) This program provide emergency shelter and housing, case management and support services to families in order to reach a higher level of self sufficiency.

CDBG: \$4,285

Seventh Objective – Special Needs Housing

The overall focus is on those populations which have special needs which are rarely served by the private market.

Strategies: The strategies to be used are:

- Develop services for special needs populations which have been growing in scope and size
- Support housing programs which serve special needs populations.

Funded Projects:

1. Health Imperatives

Health Imperatives – Penelope's Place, a program of Health Imperatives, is the only Domestic Violence Shelter in all of Plymouth County. This organization has provided services to victims of domestic violence, including children, for over 25

years. During 2010, Penelope’s Place served 31 women and 29 children. The need for these services is evidenced by the fact that during all of last year, there were only 25 days in which the organization was not at full capacity. Funding for this project will provide six separate components including salary for a part time Life Skills Coordinator. Program materials, transportation costs, personal hygiene and self care items as well as appropriate attire for job searches are all part of the program.

CDBG: \$4,285

2. Family and Community Resources Inc.

Family and Community Resources, Inc. services victims of domestic violence and their children who are residents of Brockton Housing Authority developments, or receive Section 8 vouchers through the Brockton Housing Authority and funding to expand services to homeless victims and their children living in hotels within the City of Brockton.

CDBG: \$4,285

3. BAMSI (Brockton Area Multi Services Inc.) Dorn Davies Senior Center

Located in the Campello High Rise complex with three other strategically located buildings in the city, the Dorn Davies Senior Center provides a variety of programs and services that serve the needs of senior citizens in Brockton. These services include but are not limited to Health welfare, social programs, educational programs, counseling services, support groups and a nutritional program that provides groceries to elderly low and moderate income senior citizens.

CDBG: \$4,285

Eighth Objective – Supportive Services

Several segments of the low and moderate income population are in need of supportive services if they are to remain in good health and preserve their independence.

Strategies: The strategies to be used are:

- Provide a supportive learning environment for children which will enable them to be successful at school
- ???

Funded Projects:

1. Old Colony YMCA - Cosgrove Pool

CDBG funds will be used to provide salaries and related expenses in connection with the provision of structured recreational and instructional programs at the Old Colony YMCA Cosgrove Pool.

CDBG: \$55,000

2. Old Colony YMCA – Camp Massasoit

Camp Massasoit will enable children from low and moderate income families to participate in a summer enrichment camp program. Camp participation will offer a safe and enriching experience that assists in developing the camper physically, emotionally, mentally and spiritually while in a healthy outdoor environment. CDBG funds will be used to provide transportation to and from the camp.

CDBG: \$4,285

4. Associaco Cabo Verdiana de Brockton – Youth Enhancement Program

The Association is requesting CDBG funding to support partial salary of a full time Coordinator for its Youth Enhancement Program (YEP). The coordinator provides assistance in the Cape Verdiana de Brockton’s continued efforts to outreach and assist youth in the City of Brockton. The Youth Coordinator is responsible for overseeing the youth programs and community outreach as well as conducting training sessions for mentors/volunteers. This after school program is a responsive, goal oriented community project aimed at an environment of cultural sensitivity and linguistic compatibility.

CDBG: \$4,285

Ninth Objective – Fair Housing

The Analysis of Impediments to Fair Housing contains several recommendations. Some of these can be addressed through the CDBG and HOME programs, while others require the actions of other agencies and organizations.

As a result of the City of Brockton’s Analysis of Impediments to Fair Housing Choice, the Mayor appointed a task force to analyze and recommend strategies to implement the recommendations contained in the Analysis. This Task Force is being chaired by Robert Jenkins, Director of Housing, Brockton Redevelopment Authority and its members are; Richard Sergi, Executive Director, Brockton Housing Authority, Thomas Washington, Director of Community Relations, Father Bills MainSpring, Kaitlin Leach, Assistant City Solicitor, City of Brockton. The Task Force has met regularly to discuss the issues raised in the Analysis and is continuing to meet in order to finalize its recommendations to the Mayor.

(1) Limited supply of affordable housing

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

Recommendations:

- a) Continue to work with local and regional nonprofits and others to pursue opportunities to develop new affordable housing. Networks like the Massachusetts Smart Growth Alliance can provide resources and organizing support to promote equitable growth, including

increased housing opportunities.

Actions Taken Year 3: The City of Brockton funded the Southeastern Massachusetts Affordable Housing Corporation with HOME and NSP funds to acquire and rehabilitate vacant foreclosed housing to create affordable housing units. The City is also funding the Brockton Housing Authority and the Old Colony YMCA on a Youthbuild housing project to create affordable housing units. The City has allocated HOME funds for Affordable Home Ownership down payment assistance with Neighborhood Housing Services of the South Shore. The City also is accepting applications for 40R zoning.

Actions Planned for Year 4: The City of Brockton plans to continue development of affordable housing as outlined in this Plan's Second Objective – Production

New Construction: Brockton Housing Authority

The Brockton Housing Authority (BHA) will utilize HOME funds to construct a duplex located at Plot 48-2 Tribou Street, as additional affordable housing opportunities in Brockton. BHA will acquire the property from the City of Brockton and construct the duplex with HOME funds and private financing and rent the apartments to low income tenants.

Rental Development – Acquisition & Rehabilitation

The Brockton Housing Authority (BHA) will utilize HOME funds to supplement a commitment of \$2 Million in grants to the Brockton Housing Authority and Southeastern Massachusetts Affordable Housing Corporation (SMAHC) from the Massachusetts Department of Housing and Community Development (DHCD) and/or other financing sources to acquire and rehabilitate abandoned bank-owned, foreclosed two or three family buildings as additional affordable housing opportunities in Brockton.

And this Plan's Third Objective – Increase access to homeownership for very low, low and moderate income households:

First Time Homebuyer Assistance

HOME funds to provide down payment assistance, and reasonable closing costs for eligible low/moderate income home buyers citywide. Recapture provisions are required calling for repayment on an annual declining balance basis if the property is sold within varying time periods keyed to the amount of assistance received.

Southeastern Massachusetts Affordable Housing Corporation (SMAHC) (CHDO)

Southeastern Massachusetts Affordable Housing Corporation (SMAHC), a private non-profit entity, acting as the local CHDO, will utilize HOME funds to acquire and rehabilitate single family homes and sell them to low/moderate income families as additional affordable housing opportunities in Brockton. SMAHC will use CHDO proceeds from the sale of the CHDO developed homeownership units for HOME-eligible or other housing activities to benefit low/moderate income families.

- b) Continue to use HOME, CDBG and NSP funds, and other funds as available, to develop affordable housing, and affordable housing that is adaptable or accessible to people with mobility impairments.

Actions Taken Year 3: The City of Brockton funded the Southeastern Massachusetts Affordable Housing Corporation with HOME and NSP funds to acquire and rehabilitate vacant foreclosed housing to create affordable housing units. The City is also funding the Brockton Housing Authority and the Old Colony YMCA on a Youthbuild housing project to create affordable housing units. The City has allocated HOME funds for Affordable Home Ownership down payment assistance with Neighborhood Housing Services of the South Shore.

Actions Planned for Year 4: The City of Brockton plans to continue development of affordable housing as outlined in this Plan

- c) Track demographic information about applicants for and residents of subsidized and assisted housing to ensure programs are increasing housing choice as intended.

Actions Taken Year 3:

Actions Planned for Year 4:

- d) Create incentives for affordable development in the city's neighborhoods with lower concentrations of low income residents and minorities.

Actions Taken Year 3:

Actions Planned for Year 4:

- e) Create affordable housing partnerships with adjacent communities with lower concentrations of low-income residents and minorities.

Actions Taken Year 3: The Brockton Housing Authority is contracted to operate and consult with the Abington and Stoughton Housing Authority Section 8 programs.

Actions Planned for Year 4:

(2) Lending inequities

Data on loan application, approval and denial rates as well as loan pricing demonstrates disparate treatment for minority loan applicants, particularly for Black and Latino applicants, in Brockton.

Recommendations:

- a) Continue to monitor and assess HMDA data and Community Reinvestment Act lender evaluations.

Actions Taken Year 3:

Actions Planned for Year 4:

- b) Work with financial institutions with a local presence to develop and implement more joint lending programs through partnerships with lenders and the City, Freddie Mac,

Fannie Mae, MassHousing, Massachusetts Housing Partnership (MHP) and others to promote existing lending programs and create new programs.

Actions Taken Year 3: The City of Brockton, The Brockton Redevelopment Authority and the Brockton Housing Authority are members of the Brockton Housing Partnership which is a collaboration of local lenders and Fannie Mae and Massachusetts Housing Partnership and have worked with this group to establish lending programs such as the “Buy Brockton “ program

Actions Planned for Year 4: The City of Brockton, The Brockton Redevelopment Authority and the Brockton Housing Authority will continue to work with this group on various strategies.

- c) Work with local lenders to ensure that information about affordable and fair mortgages is available to all residents in a variety of languages and formats. Specifically conduct outreach to households from protected classes.

Actions Taken Year 3: The City of Brockton has worked with the Commonwealth of Massachusetts on Foreclosure Counseling and Mitigation Fairs and has funded with CDBG funds the Neighborhood Housing Services of the South Shore to offer foreclosure mitigation counseling, homebuyer classes and its multi cultural banking center.

Actions Planned for Year 4: The City of Brockton plans to

- d) Work with residents, especially lower income people, to improve their financial management skills and increase knowledge about the lending process and laws.

Actions Taken Year 3: The City of Brockton has worked with the Brockton Housing Partnership on its “Credit for Life Fair” which is a fair that provides financial education to High School Students in a fun and interesting manner. The City of Brockton has funded with CDBG funds the Neighborhood Housing Services of the South Shore to offer foreclosure mitigation counseling, homebuyer classes and its multi cultural banking center.

Actions Planned for Year 4: The City of Brockton plans to continue its work with residents on financial management through

- e) Collaborate with others and contract for fair lending testing and pursue legal action against institutions found to be promoting discriminatory or predatory lending practices in Brockton. Both the Fair Housing Center of Greater Boston and the National Community Reinvestment Coalition (NCRC – www.ncrc.org) can be resources for the City in conducting this work.

Actions Taken Year 3:

Actions Planned for Year 4:

(3) Limited fair housing resources and activity in Brockton

Throughout this process, it has been clear that additional education opportunities and avenues for enforcement are needed. During the informational meeting about the Analysis of Impediments to Fair Housing and throughout the one-on-one interviews, there were many questions about the specifics of the laws and their impacts on rental, sale and development

of housing as well as homeownership lending. Additionally, an Analysis of Impediments to Fair Housing had not been conducted in Brockton since 2002.

Recommendations:

The City should commit CDBG resources for fair housing activities on a regular basis – some recommended activities follow. These initiatives can be through collaborations with organizations like the Fair Housing Center of Greater Boston, which already has national/regional contracts to provide the services, and some would need to be subcontracted and paid for through CDBG or municipal other funds.

The activities that follow should be conducted jointly with the local Board of Realtors, property owners (including Brockton Housing Authority and other subsidized housing owners), banks and other lenders with a local presence, and other nonprofit and for-profit real estate and finance organizations in Brockton and in the South Shore region. The City should utilize the fair housing expertise available through the Fair Housing Center of Greater Boston and/or legal services and MCAD-trained consultants.

- a) ***Fair Housing Commission:*** Form and staff a Fair Housing and Human Rights Commission to undertake and coordinate some of the activities discussed herein. (A sample ordinance is included in Appendix D.)

Actions Taken Year 3: The Mayor’s Task Force on Fair Housing is analyzing strategies to implement this recommendation.

Actions Planned for Year 4: The Mayor’s Task force will have a recommendation to the Mayor on the process for implementing this recommendation.

- b) ***Outreach:*** Conduct more outreach about fair housing and fair lending, especially to housing and service providers, residents from protected classes, small property owners, City staff, boards and commissions (especially with real estate, planning and zoning related functions) and the full range of real estate and lending professionals.

Actions Taken Year 3:

Actions Planned for Year 4:

- c) ***Outreach and Education:*** Continue to work with and fund the work of local and regional nonprofits for outreach and housing counseling, especially for residents from protected classes.

Actions Taken Year 3:

Actions Planned for Year 4:

- d) ***Information and Outreach:*** Continue to expand the availability of housing and fair housing information and outreach materials in a variety of languages. Ensure that City staff and others have access to housing and fair housing information and publications to share with residents.

Actions Taken Year 3:

Actions Planned for Year 4:

- e) **Training:** Conduct fair housing training through workshops and other public and professional education activities.

Actions Taken Year 3:

Actions Planned for Year 4:

Training: All City employees, board and commission members and elected officials who work with housing or housing related issues should be well versed in fair housing. This not only helps to avoid legal action against the City (as in the current zoning board case) but also aids in the implementation of City programs and policies. For example, Inspectional Services staff members may be well-positioned to assess whether property maintenance neglect disproportionately affects protected classes or whether owners are retaliating against tenants for contacting the City, HUD or MCAD. Furthermore, municipal obligations to affirmatively further fair housing can be useful tools to promote affordable housing development locally and regionally.

The following activities could be conducted with other agencies primarily through national and state funding that the agencies have already secured:

- f) **Case advocacy:** Partner with the Fair Housing Center of Greater Boston or legal services to establish complaint referral protocols for processing discrimination case inquiries in a timely manner. Train public, private and nonprofit advocates to recognize potential discriminatory behavior to trigger a referral for case investigation, including testing.

Actions Taken Year 3:

Actions Planned for Year 4:

- g) **Testing:** Partner with the Fair Housing Center of Greater Boston to conduct rental and sales discrimination testing in Brockton and its immediate suburbs, including testing for racial steering. Use evidence found to tailor education and outreach efforts to the particular needs of Brockton residents. Pursue complaints against actors found in violation of the law, in conjunction with service providers, the Department of Justice and/or the Massachusetts Attorney General's office.

Actions Taken Year 3:

Actions Planned for Year 4:

The following activity is a critical part of demonstrating the City's ongoing commitment to affirmatively furthering fair housing, and should be funded through CDBG and HOME administrative funds according to HUD's guidance:

- h) **Evaluation:** Conduct regular analysis of impediments to fair housing choice to ensure that

new obstacles are uncovered and progress to overcome existing impediments continues.

Actions Taken Year 3:

Actions Planned for Year 4:

Executive Summary Response: Evaluation of Past Performance

The City has completed 23 (HOME) housing units in the past year. The major accomplishments in the priority areas are as follows:

a) Preservation

The City has rehabbed 4 (HOME) owner occupied and 0 rental units in owner occupied multi-family properties with HOME and CDBG funds over the past year. It has also loaned funds to rehabilitate and improve privately owned apartment buildings. These loans to private developers (non-profits and for-profit developers) has preserved and improved ?? existing rental units as affordable in the City.

b) New construction and rehabilitation

Loans for projects to create new affordable rental and homeownership units have resulted in the creation of 6 (HOME) and 9 (NSP) additional restricted rental units being created, and 0 restricted homeownership units in the last year.

c) Access to Homeownership

The City has assisted 4 (HOME) first time home buyers with down payment and closing cost assistance to purchase property in the jurisdiction.

d) Stabilization and Improvement of "at risk" neighborhoods

It has provided supplementary funding for several projects in neighborhoods targeted for revitalization efforts, leading to increased investment in the neighborhood.

Executive Summary Response: Summary of Citizen Participation and Consultation Process (including efforts to broaden public participation) (24 CFR 91.200 (b))

Groups with programs which use or could use resources outlined in the Consolidated Plan, were notified of the development of the plan and were invited to submit suggestions, ideas and requests for support.

In addition, various organizations active in housing and services were contacted for the development of the Plan. Public meetings and hearings were conducted for public input, after official notices were advertised in local community newspapers. In addition, several interviews were conducted with organizations, seeking more specific ideas and priorities. The input from these meetings and interviews was used to generate this Year 4 Action Plan, as well.

The advertised City public meetings for public input were conducted at the following locations:

City Hall, Brockton January 19th 2011
City Hall, Brockton April 19th 2011

At the meetings attendees were invited to submit data and comments by email.

The draft Plans were made available on April 11^h 2011 at City Hall, at the BHA offices, City libraries and the draft Plan was also available online at www.brocktonhousingauthority.com and www.brockton.ma.us and by written request during the 30 day public comment period.

The City of Brockton received oral testimony during the preparation of the Annual Action Plan. Input was received from seniors, community residents, public housing and public service agencies and beneficiaries.

Representatives from several public service agencies and City Departments attended, informing staff of the changing services needed and responding to questions about priorities for the CDBG and HOME programs.

To ensure inclusion by underserved populations, agencies and groups which serve housing and public service needs were invited to participate in the process to identify goals. Many of the organizations serving the low income population of the area specifically represent the underserved and thus were able to verify underserved needs as identified in the plan.

The City also invited proposals for specific uses of CDBG and HOME funds.

Executive Summary Response: A Summary of Comments or Views and a Summary of Comments or Views not Accepted and the Reasons therefore (24 CFR 91.105 (B)(5)).

After the draft was issued and advertised, comments could be submitted to the BRA and BHA offices, prior to the completion of the final Plan.

See Attachment A for comments and responses.

General Questions

- 1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.*

2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.
3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.
4. Identify the federal, state, and local resources expected to be made available to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.

Program Year 4 Action Plan General Questions response:

1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.

The City of Brockton is located in the southeastern section of Massachusetts, some 20 miles south of Boston, and 30 miles northeast of Providence, RI. Brockton’s more than 94,000 persons reside in a community of 21.6 square miles. The City of Brockton is roughly divided into four major sections, those east and west of the rail line and the Montello section to the north and the Campello section to the south. Within these are a number of distinct neighborhoods. The neighborhoods clustered around the downtown contain the oldest and densest residential development; they clearly evidence lack of maintenance, numerous foreclosed and vacant properties, disinvestment, and higher rates of poverty and incidences of crime. These neighborhoods are referred to as:

- Pleasant/Prospect (sometimes called Walnut/Turner),
- the Edgar Playground area and
- Perkins Park.

Table 1: Poverty and Minority Concentration by Census Tract and Block (2000)

Census Tract	Poverty Rate	Minority Rate (including Hispanic)
Tract 25023-5101	4.40%	22.80%
Tract 25023-5102	12.00%	31.10%
Tract 25023-5103	22.20%	59.60%
Tract 25023-5104	23.70%	68.10%
Tract 25023-5105.01	9.50%	32.90%
Tract 25023-5105.02	12.80%	43.00%

Census Tract	Poverty Rate	Minority Rate (including Hispanic)
Tract 25023-5105.03	15.20%	39.30%
Tract 25023-5106	5.20%	13.70%
Tract 25023-5107	6.90%	31.60%
Tract 25023-5108	23.60%	69.10%
Tract 25023-5109	42.40%	66.60%
Tract 25023-5110	27.40%	55.70%
Tract 25023-5111	5.80%	24.70%
Tract 25023-5112	14.80%	34.40%
Tract 25023-5113.01	9.40%	37.70%
Tract 25023-5113.02	12.40%	37.20%
Tract 25023-5114	24.40%	64.00%
Tract 25023-5115	19.80%	63.70%
Tract 25023-5116	16.60%	42.90%
Tract 25023-5117.01	4.20%	18.20%
Tract 25023-5117.02	5.70%	15.90%
Brockton, MA	14.50%	41.50%

Note: The threshold level for HUD in applying Site and Neighborhood Standards for proposed HUD investments, established (for Brockton) a 30% poverty rate and a 36.7% minority rate as thresholds which in principle prevent HUD funds investment which would add to the poverty or minority numbers in those census tracts. They are highlighted in Table 1.

In determining whether a specific geographic area meets HUD requirements for investment of CDBG funds in an area which will benefit low and moderate income persons, the CDBG rules require that more than 50% of the residents be low and moderate income. The following table, using 2000 census data list the tracts which meet HUD’s criteria for geographic investment.

Table 2: HUD Defined Eligible Census Tracts and Blocks (2000)

Census Tract	Low-Mod %
Tract 25023-5109	98.19%
Tract 25023-5108	69.40%
Tract 25023-5105.02	68.43%
Tract 25023-5110	65.72%
Tract 25023-5103	64.69%
Tract 25023-5114	64.39%
Tract 25023-5112	64.12%
Tract 25023-5104	60.74%
Tract 25023-5116	59.58%

Census Tract	Low-Mod %
Tract 25023-5115	49.46%
Tract 25023-5105.03	47.77%
Tract 25023-5113.01	45.71%
Tract 25023-5105.01	44.05%
Tract 25023-5107	43.21%
Tract 25023-5113.02	42.62%
Tract 25023-5102	40.46%
Tract 25023-5117.02	37.58%
Tract 25023-5111	35.97%
Tract 25023-5117.01	35.45%
Tract 25023-5101	30.42%
Tract 25023-5106	25.33%
Brockton, MA	54.11%

The attached map [Attachment C] based upon 2000 Census data shows the population of Brockton is predominantly (55.5%) low and moderate-income. The attached map [Attachment D] indicates areas of minority concentration/distribution throughout the City of Brockton.

2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.

The CDBG program has identified low-mod and target areas within the City. The City both uses and considers the area’s benefit, deconcentration objectives and the foreclosure crisis as factors in choosing which programs to fund.

The following areas are beneficiary eligible areas and may be the focus of CDBG funds over the next year.

Census Tract 25023-5109: Neighborhood Name: ???. This census track had in 2000, over 98% low/mod income households.

Census Tract 25023-5108: Neighborhood Name: ???. This census track had in 2000, over 98% low/mod income households.

Census Tract 25023-5105.02: Neighborhood Name: ???. This census track had in 2000, over 98% low/mod income households.

Census Tract 25023-5110: Neighborhood Name: ???. This census track had in 2000, over 98% low/mod income households.

Census Tract 25023-5103: Neighborhood Name: ???. This census track had in 2000, over 98% low/mod income households.

Census Tract 25023-5114: Neighborhood Name: ???. This census track had in 2000, over 98% low/mod income households.

Census Tract 25023-5112: Neighborhood Name: ???. This census track had in 2000, over 98% low/mod income households.

Census Tract 25023-5104: Neighborhood Name: ???. This census track had in 2000, over 98% low/mod income households.

Census Tract 25023-5116: Neighborhood Name: ???. This census track had in 2000, over 98% low/mod income households.

The public facilities and improvement projects that will receive funding meet eligibility criteria by providing services that benefit low and moderate-income persons living in the area.

As noted already, the City uses its programs and gives consideration to projects which are in high poverty or minority concentration areas which have disproportionate needs, or which target very and extremely low income households or individuals with disabilities, in order to better meet underserved needs. Last year approximately ??% of the funds were allocated as area benefit, thus benefiting low income households living in those eligible areas. For the coming year we anticipate allocating ??% to eligible areas and another ??% will be used primarily in those areas, even though not allocated geographically.

3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.

The primary obstacle to meeting the underserved housing needs of low-income and moderate-income populations continues to be the availability of funds. Except for special populations unable to work (some elderly, most extra elderly, some disabled and those institutionalized), the critical need is jobs. When working with agencies to develop this plan, many agencies noted that a shift in clients had occurred. Previously many of the clients had no employment or sporadic employment histories. Now, individuals, who previously were fully employed are seeking help.

Organizations serving these populations continue to experience significant reductions in funding from both governmental and private sources. Reductions in state aid to local budgets have increased the funding shortfall, leaving many worthy and valuable programs unfunded or underfunded.

While this may be beyond City capacity of the local jurisdiction to address satisfactorily, the City is committed to continuing to work with and support public non-profit agencies such as the Brockton Housing Authority, elder service organizations, homeless providers and other special needs providers in their mission to meet the needs of the underserved population of the area.

The City will continue to communicate with these groups as their needs change and/or the demand dramatically increases over the next year. Wherever possible, the City will provide technical assistance and support to providers in their pursuit of federal, state and other funding sources.

Moreover, the City actively educates organizations and citizens about ways to remove barriers to the development of affordable housing and promotes proven programs. It will continue these efforts in the future.

4. Identify the federal, state, and local resources expected to be made available to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.

Brockton anticipates the following sources of funds for the year 2011-2012: