

Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

DRAFT plan – some areas of this document are pending updates that will be included in the final report.

This Annual Action Plan (AAP) serves as the application for funding to the U.S. Department of Housing and Community Development (HUD) for the Community Development Block Grant (CDBG) and HOME Investment Partnership Program. The AAP details the activities and funding planned during the City's FY2023 covering July 1, 2022 – June 30, 2023. A draft of the AAP was made available for a 30-day public comment period beginning April 15, 2022, posted to the Urban Programs Department's webpage; advertised in the Union Leader and email, if requested.

The City first develops a five-year Consolidated Plan (ConPlan) that identifies the community's affordable housing, community and economic development needs and outlines a comprehensive and coordinated strategy for addressing them. Based on the needs and priorities outlined in the ConPlan, the City then develops a plan each year to work toward the goals identified. This is the third year Action Plan related to the 2020 Consolidated Plan.

The goals of this Plan parallel those that HUD has established for jurisdictions across the country to pursue as part of their consolidated planning efforts: to provide decent housing and a suitable living environment, and expand economic opportunities, primarily for low- and moderate-income persons.

The City of Nashua is committed to a diverse and inclusive community that engages and encourages residents and institutions to work together to make Nashua the most livable city for all its residents. To this end, the City will continue to pursue strategies to address housing, economic, and social service needs of low and moderate-income residents, the homeless and special needs populations.

2. Summarize the objectives and outcomes identified in the Plan

The following categories are identified in the ConPlan, which was developed just as COVID-19 was emerging. The City opted to keep the focus on the needs originally identified. If anything, these needs have intensified as a result of the pandemic. Objectives and outcomes within this Action Plan continue take into account the need to mitigate the adverse effects of the pandemic, especially as it relates to low-moderate income households.

Affordable housing: Affordable housing is by far the top priority. Given that Nashua is primarily built out, we will continue to focus on rehab of existing units; both owner-occupied and rental properties. Using funds under this plan, leverage from other federal and state funds, and code enforcement will be undertaken to help revitalize the City's aging housing stock.

The need for housing that is affordable to very-low income households will be a priority in this Plan. According to the NH Housing Finance Authority's (NHHFA) 2021 Rental Survey report, at less than 1% (0.9%), the vacancy rate for all units is lower than last year (a vacancy rate of 5% is considered a balanced market for tenants and landlords). In comparison, both the U.S. and Northeast vacancy rates are at 6.8%. Nearly 46% of all renters are paying more than 30% of their income toward housing costs. In the lowest income Census Tracts, the majority of residents are paying 50% or more of their income toward housing costs.

Economic development: This area was ranked high in the ConPlan, with a strong focus on expanding transportation options. Transportation was identified across all sectors, as key to linking low-income individuals to employment, services and everyday needs. Transportation to and from our retail hubs, with expanded night hours continues to be a focus. However, it should also be noted that while retail jobs are abundant, they are the low paying and hold a large share of the market. Expanded economic opportunities, including access to higher paying jobs with benefits, will remain a high priority.

Public Services: Expanding availability and increasing access to needed services is a key goal of the City. Public input identified services for youth as a top need, targeting high risk youth and increasing affordable childcare programs and subsidies. Seniors were also identified as a group with high needs, specifically around the topic of transportation. With limitations to the amount of CDBG funding for public services, it is important to identify these priorities. However, both the City and its partners rely on other funds to help address these needs.

Creating livable communities: The City will continue to use CDBG funding make improvements to facilities that serve the public and infrastructure, including improved lighting, sidewalks and parks to revitalize challenged neighborhoods and strengthen community. Community facilities have struggled to modify facilities for safe distancing and carrying out services. Open spaces within the City have become more important. These needs will be a focus in the Plan year.

Homelessness: From a financial standpoint, the households most susceptible to becoming homeless are households who are at less than 30% median income and are severely cost-burdened (paying more than 50% of their income for rent). Other populations disproportionately at risk of becoming homeless are victims of domestic violence, substance abuse, those with severe mental health problems and people leaving prison. In order to address this at-risk population, there is a need for long-term permanent affordable housing and supportive transitional/permanent housing for the at-risk sub-populations. Counseling, health-care, life-skills training and sustainable employment at an adequate wage are all critical to reducing homelessness within the City. CDBG funding will be used to support these efforts under the public service cap and HOME funds will be used to increase the supply of permanent affordable housing. The City has received \$1,618,618 allocation of HOME funds under the American Rescue Plan and is in the process of developing its HOME-ARP Allocation Plan. .

3. Evaluation of past performance

The City is nearing the end of the fiscal year for the second Action Plan of the 2020 Consolidated Plan. Despite the continued difficult circumstances of the past year, the City carried out the objectives

originally identified. . The City wrapped up activities funded under the CARES Act (CDBG-CV), which involved primarily micro-enterprise business grants. Under the preceding ConPlan focus was directed to facilities and programs that serve low-moderate income individuals, improving City-owned facilities, such as parks, and housing rehabilitation. Assistance to agencies that serve youth was a top production goal. The maximum allowed was allocated to public services each year, including about five times the HUD allocation in local general fund. That level of funding highlights Nashua's commitment to local non-profits who carry out critical services in our community.

4. Summary of Citizen Participation Process and consultation process

Citizen participation to develop this Action Plan utilized a combination of virtual and in-person methods. The City has resumed in-person meetings, however continues to offer a hybrid method allowing participants to join virtually. The City solicited proposals from outside entities to help address the needs identified in the Consolidated Plan. The Urban Programs Department sends courtesy emails to inform entities of the availability of funds in advance of the date; publishes public notices to inform the general public/applicants; held a public hearing at the start of the Plan development to inform this year's priorities; submits proposals to the elected officials for deliberation during public meetings; drafts legislation to identify this year's funded activities; holds a second public hearing (also publicly noticed) to take comment on the proposed activities; provides technical assistance to the applicants and elected officials; and finally submits the Action Plan following Board of Aldermen approval. NOTE: public hearings were held in person and also via Zoom, with the agenda and instructions posted to the City's website. The UPD also sends emails to applicants to inform them of the meetings.

The UPD consulted directly with the Greater Nashua Continuum of Care, nonprofit and social service agencies, the Nashua Housing Authority, The New Hampshire Housing Finance Authority, Nashua Regional Planning Commission, public agencies and City departments regarding the priorities and needs addressed in this Plan. These consultations transpired through emails, work groups and other virtual methods.

5. Summary of public comments

Comments will be added to the final version, following the public comment period.

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

Pending

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	NASHUA	Community Development, Urban Programs
HOME Administrator	NASHUA	Community Development, Urban Programs

Table 1 – Responsible Agencies

Narrative (optional)

The City of Nashua’s Urban Programs Department within the Community Development Division is the administrator for the CDBG and HOME Programs and responsible for the Consolidated Planning process.

Funds under the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009, such as McKinney-Vento, Emergency Solutions Grant (ESG) or Housing Opportunities for Persons with AIDS (HOPWA) programs, are sought on a competitive basis and managed by the Greater Nashua Continuum of Care, consistent with this Consolidated Plan.

Consolidated Plan Public Contact Information

Deb Chisholm
Interim Urban Programs Manager
Community Development Division
T: 603-589-3092
F: 603-589-3398

AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

Large scale consultations occur during development of the Consolidated Plan. The City relies on information from the public, non-profits, the private sector and itself to compile the data needed to prioritize needs and goals. The city consulted many outside entities, as well as internal departments, as noted throughout the Plan (i.e. Emergency Management, Division of Public Health & Community Services, Nashua Public Library, Building, Code, GNCOC, etc.).

Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

The City of Nashua’s Community Development Division regularly coordinates with public and assisted housing providers along with private and governmental health, mental health, and service agencies. The Community Development Department’s Director sits on the NH Housing Finance Authority’s Board of Directors; the Urban Programs Manager oversees the Citizens Advisory Commission for Community Grants process; the City’s Welfare Officer is part of the Greater Nashua Continuum of Care. These are just a few examples of the many facets of coordination between the City and the community. Engaging with nonprofit service providers on a regular basis will continue to foster an environment where the City works in tandem with the community towards better development.

During the past two years, the COVID-19 pandemic highlighted the strength of the City’s network and partnerships with non-profits, the business community, and its residents. Utilizing digital tools, the City took swift action to connect with those entities serving Nashua’s most vulnerable populations. Agencies proved they were nimble and more than capable to ensure residents’ needs were met. From food, to household goods, medical and dental care, groceries, transportation, emergency housing needs and essential child care. The City continues to utilize this reinforced network to continue to carry out the goals within this Plan and agencies continue to respond to changing resident needs as the health crisis persists.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The Greater Nashua Continuum of Care (GNCOC) is the primary decision-making group that manages the overall planning effort for homelessness. The communities served by GNCOC include Nashua, Brookline, Amherst, Hollis, Merrimack, Milford, Mont Vernon, Hudson, Litchfield and Mason. The GNCOC utilizes federal, state and private funds to address the needs of homeless, including competitive grants. Participating partner agencies include transitional housing providers, permanent housing providers, veteran’s services organizations, and shelter programs.

The City is represented at the GNCOC by Manager of the Welfare Department, a department within the City of Nashua's Division of Public Health & Community Services (DPHCS). The Welfare Officer is a member of the GNCOC Executive Board and also chairs the GNCOC Ending Homelessness sub-committee. The Ending Homelessness sub-committee was very active in the creation and implementation of the Coordinated Entry process for the Greater Nashua community, working with partner agencies to provide clients access to necessary homeless prevention and shelter services, including chronically homeless individuals and families and veteran populations.

The Urban Programs Department is on the email list for the GNCOC, attends meetings, receives updates and minutes directly. The UPD also consults with the administering agency of the GNCOC to obtain data required for this report.

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

The City is not a direct recipient of ESG funds. The GNCOC applies for ESG funds through the SuperNOFA competitive process, using the Consolidated Plan and member input to determine how to allocate ESG funds. The City's Welfare Officer, part of the Division of Public Health and Community Services, is a member of the GNCOC and coordinates between the City and the GNCOC. The Urban Programs Manager is included on the GNCOC list-serve and attends meetings periodically.

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

As described above, the City consults with a variety of non-profit housing and social service agencies to develop the Action Plan. The Plan is also developed through the Aldermanic Human Affairs Committee. These elected officials represent the city-at large as well as neighborhood specific areas. They help bring a community-wide perspective when determining which activities to fund.

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Neighborworks Southern NH
	Agency/Group/Organization Type	Housing Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was consulted through Stakeholder Session; provided narrative content; and statistics.
2	Agency/Group/Organization	CASA
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was consulted through Stakeholder Session; provided information related to abused and or neglected children.
3	Agency/Group/Organization	Nashua Youth Council
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Public Services
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Offer counseling, student assistance, accountable suspension, prevention, education and court diversion. Agency was consulted through Stakeholder Session.
4	Agency/Group/Organization	Lamprey Health Care
	Agency/Group/Organization Type	Services-Health
	What section of the Plan was addressed by Consultation?	Health Agency
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency provides health services primarily for low-income individuals. Agency was consulted through Stakeholder Session.

5	Agency/Group/Organization	Entrepreneurship for All, Inc
	Agency/Group/Organization Type	Services-Employment
	What section of the Plan was addressed by Consultation?	Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in stakeholder session; outcome anticipated includes how to utilize Plan funds to improve micro-enterprise development
6	Agency/Group/Organization	PLUS Company
	Agency/Group/Organization Type	Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was consulted through Stakeholder Session as an entity that serves disabled population.
7	Agency/Group/Organization	Front Door Agency
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Transitional Housing
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	
8	Agency/Group/Organization	BOYS AND GIRLS CLUB OF GREATER NASHUA
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Public Services
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was consulted through Stakeholder Session; provides youth focused services

9	Agency/Group/Organization	Greater Nashua Habitat for Humanity
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was consulted through Stakeholder Session; partner to provide affordable home owner units.
10	Agency/Group/Organization	Southern New Hampshire Medical Center
	Agency/Group/Organization Type	Health Agency Major Employer
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Non-Homeless Special Needs Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was consulted through Stakeholder Session; regional hospital; provides major employment as well as services to low income individuals.
11	Agency/Group/Organization	Girl Scouts of the Green and White Mountain
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Public Services - youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was consulted through Stakeholder Session; new partner; provides youth services

12	Agency/Group/Organization	United Way of Greater Nashua
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide
	What section of the Plan was addressed by Consultation?	General Community Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was consulted through Stakeholder Session; provides well-rounded community services; supports other non-profits in addition to its own programs
13	Agency/Group/Organization	Family Promise of Southern NH
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was consulted through Stakeholder Session; new partner; provides transitional housing for families - including fathers.
14	Agency/Group/Organization	State of New Hampshire Healthy Homes and Childhood Lead Poisoning Prevention Program
	Agency/Group/Organization Type	Other government - State
	What section of the Plan was addressed by Consultation?	Lead-based Paint Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency provides data and support related to lead poisoning. Recent Data Sharing Agreement executed to streamline Nashua's response to lead-poisoned children.
15	Agency/Group/Organization	NH Healthy Families
	Agency/Group/Organization Type	Publicly Funded Institution/System of Care
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was consulted through Stakeholder Session; new partner; provides Medicaid insurance; direct health benefits
16	Agency/Group/Organization	Nashua PAL (Police Athletic League)
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was consulted through Stakeholder Session
17	Agency/Group/Organization	Opportunity Networks
	Agency/Group/Organization Type	Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was consulted through Stakeholder Session; provides services to disabled adults
18	Agency/Group/Organization	Grow Nashua
	Agency/Group/Organization Type	Services - food
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was consulted through Stakeholder Session; new partner; agency provides gardening set-up and education, community gardening

19	Agency/Group/Organization	NASHUA SOUP KITCHEN AND SHELTER
	Agency/Group/Organization Type	Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was consulted through Stakeholder Session; continuing partner; currently slated for HOME funds to construct a new homeless facility that includes transitional housing.
20	Agency/Group/Organization	Comcast
	Agency/Group/Organization Type	Services - Broadband Internet Service Providers
	What section of the Plan was addressed by Consultation?	Broadband
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Principle internet service provider for the City. Consulted via email and conference call; outcome to discuss coverage options available to low-income households.
21	Agency/Group/Organization	City of Nashua - Office of Emergency Management
	Agency/Group/Organization Type	Agency - Emergency Management Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency directly consulted as an internal partner/organization. Office of Emergency Management is responsible for hazard mitigation planning, including flood plain and public waterways.

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

The City attempted to include all major agencies providing a full range of services in and around Nashua, none were purposefully excluded/not consulted.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Greater Nashua Continuum of Care	The Continuum of Care provides the framework and services for many of the activities provided locally to provide assistance and housing to homeless individuals and families.
NRPC 2020 Housing Needs Assessment	Nashua Regional Planning Commission	Assessment of regional housing needs, focused on affordability.
Nashua Regional Plan	Nashua Regional Planning Commission	Community & Economic Vitality, Environment, Housing and Transportation. The City especially relied on the Housing Needs Chapter of the Regional Plan.
2017-2018 Biennial Housing Plan	NH Housing Finance Authority	Affordable housing
2015 Analysis of Impediments to Fair Housing	NH Housing Finance Authority	Affordable housing, fair housing, rental data
2021 Residential Rental Cost Survey	NH Housing Finance Authority	Affordable housing, rental data/needs
2015-2024 Ten Year Transportation Plan	State of NH	Economic development, transportation, opportunities for low-income residents
Analysis of Impediments to Fair Housing	City of Nashua	Affordable housing, fair housing
2020 Community Health Assessment	City of Nashua, Div of Public Health & Comm Services	Health & housing link, opportunities and suitable living environments for low-income residents
Housing Data (Purchase & Rental Trend Reports)	NH Housing Finance Authority	October 2020 report, analyzes current housing trends. Affordable Housing
Housing Needs in NH	NH Housing Finance Authority	Affordable housing
Resilience Dialogue Final Report 2018	City of Nashua, Office of Emergency Management	Hazard mitigation and disaster preparedness

Table 3 – Other local / regional / federal planning efforts

Narrative (optional) - None additional

AP-12 Participation – 91.105, 91.200(c)

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

During the Action Plan process we rely on Public Hearings and the regularly scheduled Human Affairs Committee meetings to obtain input on the annual goals. Two public hearings are conducted, in addition to the Human Affairs Committee meetings, providing the public the opportunity to comment throughout the Plan development. All meetings were held virtually and in person and several agencies participated. Although a different format, we have received positive feedback on the improved accessibility of virtual meetings. Participants have noted through conversations that they no longer have to allocate many evening hours to attend a physical meeting, that they can be logged in while at home, doing other tasks and simply unmute when it is appropriate for them to speak.

Other methods of goal setting include the rankings from the Citizen’s Advisory Commission (CAC). This group is comprised of seven Nashua residents, representing a cross-section of backgrounds, responsible for reviewing proposals related to human services (both CDBG and general fund). They review approximately 35 proposals each year from various social service providers and assess community need, ability to meet the community need and the agency’s need for public funding.

The Action Plan is built upon the goals and priorities identified in the Consolidated Plan which was developed using intensive public participation. Annual plans do not see the same level of participation and we rely heavily on the ConPlan to help direct funding over the course of the 5-years. Citizen participation was an integral component in developing the Consolidated Plan. The ConPlan was also developed just as the pandemic emerged. Some in-person consultation was completed prior (neighborhood events, surveys and stakeholder session). Near the end of the planning phase, we had to switch to virtual participation. As noted above, we feel this may have actually benefitted the overall process. Furthermore, due to the public health crisis, the City was consulting with more entities than ever imagined. This was also a benefit as we were able to work plans for HUD funding into the conversations.

Consultations: The UPD consulted directly with the GNCOC, nonprofit, social service agencies, the Nashua Housing Authority, The New Hampshire Housing Finance Authority, Nashua Regional Planning Commission, public agencies and City departments regarding the priorities and needs addressed in this Plan.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Public Notices	Non-targeted/broad community	Advertisements of public hearings 1/30/2022 and 3/20/2022	N/A - no comments received related to public notices/newspaper ads	None	
1	Public Hearing	Non-targeted/broad community	2/17/2022 – solicit input on priorities and goals for the FY23 Annual Action Plan. Non-profit applicants attended in support.	Non-profit applicants in attendance spoke in support as recorded as part of Public Hearing	None	
2	Public Meeting	Non-targeted/broad community	2/17/2022 & 3/14/2022 Human Affairs Committee meetings to evaluate proposals	General discussion of proposals. Some members of the public attended.	None	
4	Internet Outreach	Non-targeted/broad community	N/A - social media promotion of Action Plan process	N/A - no comments received related to internet outreach/postings	N/A	
5	Public Meetings	Non-targeted/broad community	Citizens Advisory Commission meeting to discuss public service requests	No members of the public commented	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
6	Public Hearing	Non-targeted/broad community	4/18/2022 Human Affairs Committee – seek input on proposed activities	Pending	N/A	

Table 4 – Citizen Participation Outreach

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Expected Resources

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

Introduction

The City anticipates the following resources being available during the term of the Plan. Nashua is an Entitlement community for CDBG and HOME and we apply as a City directly to HUD for Lead-Paint grant awards. Other funds listed, including COC and Housing Authority are listed for informational purposes. The City is not the direct recipient and does not manage the funds. In other states/jurisdictions, the city may be a direct recipient and this template provides for them to report. However, all the funds listed do help in meeting community needs identified in this Plan. The City received a \$1,618,618 allocation of HOME funds under the American Rescue Plan and is in the process of developing the HOME-ARP Allocation Plan

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Anticipated Resources NEED REVISIONS

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 3				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	664,000	45,000	\$445,316.57		2,115,000	Expected Remainder of Consolidated Plan: aprox \$664,000 EN plus \$45,000 program income. Prior year funds:

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Program	Source of Funds	Uses of Funds	Expected Amount Available Year 3				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	447,023	0	617,708		1,350,000	Expected amt remainder of Consolidated Plan: approx. \$450,000/year Prior year funding based on PR27 report. Development funds avail=\$434,524; CHDO =\$140,406; Admin = \$42,777.60.
Other	private	Housing	75,000	0	0	75,000	150,000	Private funds, in the form of property owner contributions, toward Lead Hazard Control Grant projects.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 3				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other	private	Multifamily rental rehab	15,000	0	0	15,000	30,000	Private funds, in the form of property owner contributions required under the rental improvement program.
Other	public - federal	Housing	697,000	0	0	697,000	2,448,000	HUD Lead Paint & Healthy Homes grant, est. 41 units @ \$17,000ea
Other	public - federal	Housing TBRA	1,940,000	0	0	1,940,000	5,400,000	HUD funds awarded to the Greater Nashua Continuum of Care to address homeless needs (rental, transitional, supportive housing and services). Est remaining = \$1.8M*3 years

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Program	Source of Funds	Uses of Funds	Expected Amount Available Year 3				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other	public - state	Housing	100,000	0	0	100,000	300,000	State lead paint loan fund. Used as supplement/gap filler to HUD lead grant projects
Other	public - local	Public Services	522,000	0	0	522,000	1,566,000	Local funds through the Mayor's budget for human service activities. Remaining est = \$522k*3 yrs

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Program	Source of Funds	Uses of Funds	Expected Amount Available Year 3				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Public Housing Capital Fund	public - federal	Housing	14,583,290	0	0	14,583,290	\$42,000,000	2021 funds: <ul style="list-style-type: none"> • Operating Subsidy \$2,687,668 • Capital Fund Program \$822,249 • Housing Choice Voucher Program (includes PBV) \$10,424,691 • Single Room Occupancy \$284,540 • CARES Act \$364,142

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Table 5 - Expected Resources – Priority Table

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

Resources from private and non-Federal public sources are expected to leverage the federal funds detailed above, such as private contributions to Subrecipients, Low Income Housing Tax Credits, historic tax credits, and conventional mortgage products. Many of the City's grants require non-federal match. In these cases, the federal grants leverage private resources (as described above) such as owner contributions, in-kind and

donated/discounted services.

HOME Match: Each HOME project is evaluated to determine the amount of match provided during the underwriting phase by reviewing the proposal to identify eligible match. Since match can be “banked” and credited to future projects, some projects will offer higher or lower amounts of match. The City tracks match on a cumulative basis to ensure the minimum 25% is met.

Match is tracked using an Excel spreadsheet identifying the project contributing match, the value of match, date recognized, match source, annual Disbursement Requiring Match (from PR-33) and running match balance (credit). Documentation of match varies depending on type. Income receipted would be checks received; value of volunteer labor/materials documented through a final report upon project completion; cash match/private funds would be proof of grant awards/distributions, etc.

Eligible match can be cash (but not owner equity), services, labor and donated materials/equipment, waived taxes or fees, value of donated land, cost of infrastructure improvements, or other resources that become a permanent contribution to affordable housing. Direct costs of supportive services to residents of HOME projects can also be considered as match.

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

The city currently has no plans to develop publicly owned land to address needs identified in this Plan. Individual Action Plans will be updated as needed if the opportunity arises.

Discussion

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Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Updated in final plan based on allocations approved by Board of Aldermen

Table 6 – Goals Summary

Goal Descriptions

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Projects

AP-35 Projects – 91.220(d)

Introduction

Projects/activities that will take place during the program year to address the priority needs and specific objectives identified in the Consolidated Plan can be found listed in the attached Resolution(s). Some prior year projects have been pulled into this Plan. Particulars are noted in the individual project narratives.

Total of CDBG projects = \$764,000; funds available in AP-15 totals \$819,000. The difference is uncommitted funds: \$10,000 from the project at the PLUS Company, cancelled in April 2022 and not yet reallocated; and \$45,000 from The Nashua Center HVAC project, cancelled as the project had already begun prior to availability of funds.

Projects

Public Services estimated (15% cap)	\$99,600.00
UPD Project Delivery	\$125,000.00
UPD, Administration (20% cap)	\$141,800.00
Owner Occupied Housing Improvement	\$50,000.00
Rental Improvement Program	\$125,000.00
Pine Street Pedestrian Crossing	\$30,797
Area Agency – Fencing	\$8,985.00
ALC – Roof	\$75,000.00
Boys & Girls Club – Sewer Line Repair	\$14,000.00
Nashua Children's Home – insulation & sewer replacement two different locations	\$23,195.00
NSKS – Quincy Street - Flooring	\$30,000.00
Plus Co – Flooring	\$15,623.00
Opportunity Networks – windows	\$25,000.00

Table 7 - Project Information

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

The primary objectives of the activities listed are to benefit low-income and moderate-income residents. The resources covered by this Plan will be directed to those areas of the City where the highest concentrations of low-moderate income individuals reside.

The public facility and improvement projects that will receive funding meet eligibility criteria by providing services that directly benefit low and moderate-income served at the facility.

The greatest obstacle to meeting underserved needs is the limited availability of funding. Recent funding through the presidential stimulus packages has helped, however, those funds were also needed to mitigate the negative financial impacts of COVID-19. Non-profits have indicated access to programs is another obstacle. Namely, individuals are often unaware of the resources available. To that end, the City and partnering agencies have utilized new technologies to promote resources. For example, advertising through social media (targeted ads on FaceBook, twitter, etc).

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AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

At this time, the City does not have a formal target area. The primary objectives of the activities within this Plan are to benefit low-income and moderate-income residents. The resources covered by this Plan will be directed to those areas of the City where the highest concentrations of low-moderate income individuals reside. As previously discussed, Census Tracts 104-108 have the highest need and although not formal, by default most of the activities are targeted to that area.

The public facility and improvement projects that receive funding meet eligibility criteria by providing services that benefit low and moderate-income persons living throughout the community.

Geographic Distribution – N/A

Rationale for the priorities for allocating investments geographically

Activities inherently occur in low-income areas. The City has not prioritized funding based on a geographic area, rather the priority is driven by the beneficiary (i.e. youth, homeless, special needs, etc).

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Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

This section reflects households provided affordable housing that meets the definition at 24 CFR 92.252. The # of units reflects the estimated households assisted under the HOME program. We estimate 4 rental units under CHDO development (Neighborworks); and 2 units under home ownership development (Habitat).

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	2
Special-Needs	0
Total	6

Table 8 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	2
Rehab of Existing Units	0
Acquisition of Existing Units	0
Total	2

Table 9 - One Year Goals for Affordable Housing by Support Type

Discussion

Applications for HOME development projects are accepted on a rolling basis throughout the year. The numbers above reflect projects in the pipeline or inquiries that we anticipate becoming projects during the year.

AP-60 Public Housing – 91.220(h)

Introduction

The Nashua Housing and Redevelopment Authority (NHRA) is the largest affordable housing provider in the City. The quality of the living environment for public housing residents is critical to the neighborhoods where public housing is placed, and the City will do everything it can to support revitalization efforts. .

The City is supporting a major redevelopment effort by the NHRA. The Bronstein Apartments was a 48-unit public housing development located on a 4.2-acre site at 41 Central Street, Nashua, NH. The Property was built in 1971 and was in poor physical condition. NHRA partnered with Boston Capital to redevelop Bronstein Apartments utilizing competitive 9% and 4% low-income housing tax credits, bond financing, and the HUD Section 18 Demolition/Disposition Program. The property has been completely razed to make way for four new buildings having a total of 216 affordable units; 48 project-based vouchers PBV were dedicated to the site.

The City approved HOME funds (\$700,000) as well as entered into a MOU related to payment in lieu of taxes, street improvements and other concessions to help enable the project. Significant time was spent by several City departments, working toward a September 2021 closing date. The work began right away and is estimated to take approximately three years to complete.

As the Responsible Entity, the City conducts the environmental reviews for the NHRA. These are done according to the terms of an Agreement. The City recently added the NHRA to our Programmatic Agreement with NH SHPO to streamline historic review. The City dedicates significant time to preparing these reviews and considers this support critical to the NHRA's operations and ability to maintain its housing stock.

Other actions during the next year to address public housing needs and Section 8 Housing Choice Voucher Program include:

- Apply for additional Section 8 Housing Choice Vouchers, should they become available.
- Utilize Project Based Vouchers to provide additional low-income housing choices to the community.
- Continue to achieve acceptable scores within the Public Housing Assessment (PHAS) system. NHRA was designated a Standard Performer in 2019 – NHRA will make every effort to increase its designation.
- Strive to maintain high performer status under the existing Section Eight Management Assessment Program (SEMAP) standards. A High Performer Status was achieved under SEMAP during 2019.
- Plan for alternative affordable housing opportunities under HUDs Rental Assistance Demonstration program, or any other programs available to the NHRA.
- Ongoing oversight and incorporation of bi-annual development and unit inspections to ensure properties meet or exceed HUD standards.
- Plan and assess capital improvements to NHRA's public housing stock in order to improve the

sustainability of its properties. A full review of NHRA's five-year capital improvement plan was completed, and work is ongoing to address some of these needs. Recent work completed included roof, siding, window and door replacements at multiple developments. Upcoming work will continue to address the building envelopes at public housing developments.

- Finalize environmental site assessments (and any required mitigation) at all housing sites.

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

The Nashua Housing and Redevelopment Authority has a Resident Advisory Board (RAB) consisting of public housing residents and Section 8 participants. The Executive Director meets with the RAB annually to discuss any programmatic opportunities and plans for new initiatives. RAB members participate in the creation and acceptance of NHRA's Annual PHA Plan, and work together with NHRA staff to address common goals and objectives. Should any opportunities present themselves to encourage home ownership, NHRA will act on those opportunities. The NHRA does not currently have a program in place to encourage home ownership. If the City was to launch a home-buyer program, it would be appropriate to target HOME-funded assistance to public housing residents. .

The NHRA plans to continue the following initiatives to involve residents:

- Meetings with residents to encourage and promote the start-up of Resident Associations to promote socialization and special community activities run by the resident leadership of the Association.
- Meetings with residents to encourage and assist in starting Crime Watch groups at developments showing a need or desire to have one.
- NHRA representation at all Resident Association meetings with management acting as a liaison between residents and NHRA.
- Involvement from the Resident Advisory Board (group of individuals from public housing and Section 8 selected to serve on this Board) in the planning and development of NHRAs required Annual and Five-Year Plan.
- Educational sessions provided to residents on site on important health and safety topics (bed bug awareness, fire prevention, etc.)
- Management will work closely with local and state agencies such as the Welfare Dept., Health Dept., mental health providers, and family services providers to determine assistance needed for NHRA families.
- Management will collaborate with local community agencies to provide services and programs for NHRA residents.
- Monthly review of all criminal activity reports supplied by the local police department to coordinate efforts to resolve and/or prevent further problems.
- Management develops and conducts efforts to involve families in community activities such as development beautification events.
- NHRA representation at a multitude of community networking and service provider meetings.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

NHA achieved a designation of *Standard Performer* in 2019.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The Greater Nashua Continuum of Care (GNCOC) is the primary decision-making group that manages the overall planning effort for the entire COC. The communities served by the COC include Nashua, Brookline, Amherst, Hollis, Merrimack, Milford, Mont Vernon, Hudson, Litchfield and Mason. The GNCOC utilizes federal, state and private funds to address the needs of the homeless, including competitive HOPWA grants. Limited resources covered by this Plan are directed toward Homelessness. However, the City as a whole and many of its Divisions work to address this need outside of Plan resources. Information relating to the GNCOC's goals was obtained from their annual HUD reports.

For virtually all homeless individuals and families, decent, safe, affordable housing is a critical step in ending homelessness. In some cases, this is their only need. Often, in addition to affordable housing, the homeless also need supportive services to make the transition to independent living or to deal with other problems. Common issues include substance abuse, mental illness, childcare, transportation, life skills, job training and other basic life skills.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including:

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

The City relies on the GNCOC to conduct outreach and be the “boots on the ground” in reaching the homeless population. The City is represented at the GNCOC by the Manager of the Welfare Department, a department within the City of Nashua's Division of Public Health & Community Services (DPHCS). The Welfare Officer is a member of the GNCOC Executive Board and also chairs the GNCOC Ending Homelessness sub-committee. The Ending Homelessness sub-committee was very active in the creation and implementation of the Coordinated Entry process for the Greater Nashua community, working with partner agencies to provide clients access to necessary homeless prevention and shelter services, including chronically homeless individuals and families and veteran populations. The City's DPHCS also provides outreach to homeless and at-risk members of the community through health activities on the Outreach Van.

Three barriers identified by the COC for those who are unsheltered are: reluctance to go to shelter, lack of transportation, and lack of ID. To address these barriers, outreach providers can house individuals directly from unsheltered situations, provide transportation and bus tickets to services, and purchase birth certificates and ID cards.

The GNCOC will continue to implement several strategies which include: providing clients with documents needed for employment (identification cards and birth certificate), refer to job employment programs which help clients to obtain their GED-TASC and assist with resume writing, allow the homeless to use their address of job applications, SOAR Team Members assist by walking people through the process of signing up for benefits. GNCOC will also provide clients with a list of agencies

that will hire sex offenders and those with a criminal background.

Specific outreach to the LGBT population and training to providers is also a priority. Southern NH HIV/AIDS Task Force is a non-profit AIDS Service Organization providing affordable housing, case management, and supportive services including access to medical care and medications to individuals and families living with HIV/AIDS and offers HIV testing and counseling to those at risk of HIV infection. As a member of the GNCOC, this agency offers a unique, holistic approach to care and prevention resulting in better outcomes for clients and community. While this Task Force is the lead agency, no GNCOC agency discriminates with regards to LGBT, and these agencies are trained on a regular basis on providing equal access to HUD Programs. Agencies also receive a list of resources to refer LGBT individuals to depending upon their need. Any client or community member with a discrimination claim due to HIV status or LGBTQIA identity are referred to GLAD – Gay and Lesbian Advocates and Defenders – New Hampshire.

In order to better identify and assess the needs of homeless youth, the GNCOC has partnered with the Balance of State COC (BOSCO) where COC leadership engaged the statewide Youth Subcommittee, which includes COC funded programs, child protection and juvenile justice staff, NH's Runaway and Homeless Youth programs (administered by Child and Family Services – CFS), and members of the former NH Homeless Teen Task Force, State Representatives, the Department of Education, and school district McKinney Vento homeless liaisons to increase PIT count participation by youth centered providers.

The GNCOC conducts an event, the Employment Connect annually at the Nashua Public Library. This event is targeted toward at-risk and homeless individuals to link with employment resources.

Addressing the emergency shelter and transitional housing needs of homeless persons

The Greater Nashua Continuum of Care continues to work to improve and streamline their Coordinated Entry process. Currently a phone line offers 24-hour response. A caller leaves a message with pertinent information and the assigned provider returns the call with shelter availability information. Plans to improve and streamline the process are ongoing. Goals include refining the intake form, continued training for participating providers and better data collection.

There are three emergency shelters operating in Nashua, two receiving some Emergency Solutions Grant (ESG) funds as well as several agencies with transitional housing programs. The shelter programs have relationships with the two local hospitals to provide support for individuals seeking services from the Emergency Department for behavioral health issues, and provide emergency shelter once they are discharged from the hospital.

The rate of homelessness varies by population type. Good progress was made over the last several years. From 2015-2019 total homeless persons decreased by 18%; families decreased by 25% (but had a slight increase from 2018-19); and chronically homeless -62%. This last group, however, saw a sharp increase from 2018-19 with a 40% increase, which reflected four individuals (total for the year 14) Rental costs have risen by 20% in the last five years, while the average renter in Nashua earns only half the income needed to afford a median priced two-bedroom apartment. In our region, almost half of households are cost burdened—their housing costs account for an unsustainably high percentage of

their income. The Nashua Soup Kitchen and Shelter (NSKS) is working to develop a new shelter facility in

downtown Nashua, within a five-block radius of the bus station, the welfare office, the library, two community health centers, a hospital, and mental health services. The new shelter will have increased capacity for single men, single women, families, and for transitional housing, to provide supported, long-term housing for Nashua's chronically homeless who have been living on the street. The expanded space will provide a day center for 20 people at a time, relieving them of walking the streets of downtown Nashua, as well as classroom space for AA meetings, HiSET, parenting, financial literacy classes, and more. Programming will also offer onsite childcare, enabling parents to attend meetings & educational classes. The City has allocated HOME and other funding to this project, under which 10 units of transitional housing will be created. Construction began in fall of 2021 and is expected to take approximately one year to complete.

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

Under the ESG program the GNCOC has a goal that 70% of participating households will achieve housing stability for six months following the end of rental assistance and that 50% of participants will maintain or have increased their income at program exit, demonstrating sufficient income to maintain housing.

The GNCOC has established a practice of using the "no-wrong" door approach for families entering the systems. Clients are addressed in the Coordinated Entry System to identify a person's barriers to achieve stable housing. Families are prioritized based upon their complex, co-occurring issues that are likely to impact housing stability. This approach involves quickly connecting homeless families within 30 days to permanent housing without preconditions and barriers to entry by performing intake, assessment, prioritization, housing location, move-in, case management, and on-going follow-up. Supportive services help to maximize housing stability and work to prevent the return to homelessness. Coordinated entry/shelters work with families on reunification with friends and/or family that may help while connecting them to resources to improve their situation to assist with housing stability on their own.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

During the past year, GNCOC reported a reduction of approximately 27% (520 to 375 people) in the number of first-time homeless for persons with entries into ES, SH, TH or PH (and 35% the year prior). The continued reduction can be attributed to the GNCOC's Coordinated Entry Team which has

placed diversion as its top priority when meeting with homeless individuals. Through diversion the Team is able to determine if an individual is truly homeless, has no other place to go and needs to be in a homeless facility. Some are more on the "risk of becoming homeless" due to payments owed on utility bills, rent, etc. In these cases, the team works to find resources to address this issue so the individual can remain housed. The CoC continues to educate providers order to identify risk factors for homelessness through a diversion process. These risks include safety, employment/income status, family dynamics, mental and physical health, substance use, and history of housing and homelessness.

Diversion is attempted before entering an emergency shelter and several diversion attempts may occur before the client is fully assessed. All these diversion attempts are documented in HMIS, and clients are not engaged for permanent housing placement until all diversion options have been exhausted. Diversion also helps to determine if there are other locations such as a relative or friend's house where they can stay. When prevention funds are available, they are used to respond to service issues. Harbor Homes Inc. a funded agency, with the GNCOC Board is responsible for overseeing this Assessment Team and its strategy. The GNCOC's adopted discharge protocols, which covers discharge from foster care, health care, mental health and corrections can be found at their website <http://nashua-coc.org/>

In 2020, the agencies of the Partnership for Successful Living – Harbor Homes, Keystone Hall, Southern NH HIV/AIDS Task Force, and Healthy at Home – became Harbor Care Harbor Homes Inc.. Harbor Care is the lead agency for the GNCOC and a strong partner to the City in addressing homelessness. They recently became the first agency in New Hampshire designated an EnVision Center by the U.S. Department of Housing and Urban Development. Envision Centers are service hubs that bring community supports together to create greater access, continuity and integration to support four key pillars: economic empowerment; educational advancement; health and wellness; self-advocacy and leadership. The Urban Programs Department is currently collaborating on this initiative to explore how the City can pair its HUD funding to align with this initiative. Although numeric goals are not yet known, we hope to have results to report at year end.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

The City's affordable housing crisis continues to worsen over previous years. The NH Housing Finance Authority's 2021 Rental Survey indicates median two-bedroom rent in Nashua increased from \$1,265 per a month in 2016 to \$1,742 per month in 2021. A 27% increase in the last five years and 33% increase since 2011.

The report further indicates Hillsborough County's vacancy rate in 2021 was 0.6% for a two bedroom, whereas a vacancy rate of 4% to 5% is considered a balanced market for supply and demand. Nashua's vacancy rate is well below that of the Northeast region and the U.S., both of which are 6.8%.

The State's highest rents are located in the southern counties near the state's largest cities and close to employers as well as the Boston job market. This is also where most of the state's rental housing properties are located. In New Hampshire, 40% of rental households are paying 30% or more of their household income on rent. Lower-income families are likely to be paying an even higher percentage of their household income towards rent. Renter households throughout the state would need to earn more than the median renter income (Income Needed to Afford Rent) to be able to afford the rent for a two-bedroom unit; and in Hillsborough County they would need to earn 133% more than the average.

Furthermore, fair housing and affordable housing are closely intertwined. The most recent Analysis of Impediments to Fair Housing (conducted as an Assessment of Fair Housing) revealed there are some public policies that affect the limited availability of affordable housing. Examples include single family zoning restrictions, lot and green space restrictions, limitations on parking, etc. Other barrier examples include families opting to house multiple households in one unit, due to rising rents and economic downturns. Nashua does not restrict the number of related persons in one dwelling unit, however there can only be up to three unrelated people. The City's most affordable housing, namely rental, is coterminous with the inner city where the housing is dense, the population is predominately low-income and open space is limited. Parking in higher density areas or for homes with large families is a problem as parking space is limited. Nashua generally does not allow overnight parking on city streets, however recently revised its parking ban to allow certain streets (those in the most dense/low-income neighborhoods) to park on the street.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

During the height of population growth many communities in NH established incentives for the development of housing for older persons. Given that the State has an aging population the development of age restricted housing was partially in response to meeting a growing demand. Senior housing theoretically had lower tax implications to municipalities than housing with children, making it more desirable. While such developments are exempt from familial status and age discrimination complaints, their proliferation came at the detriment of meeting housing demands for families with children. This past year the City amended its Senior Housing Ordinance to tighten the definitions and criteria to qualify as senior housing. The legislation better regulates where this housing can be

developed and its suitability within the proposed neighborhood.

Recent studies identified a serious mismatch between the existing housing stock in the state and the needs and desires of our changing population. NH's Accessory Dwelling Unit (ADU) law, which took effect on June 1, 2017 permits a residential living unit that is within or attached to a single-family dwelling on the same parcel of land as the principal dwelling unit it accompanies. ADU's increase the housing supply without further land development, are an affordable housing option for many low-moderate income residents, improves homeowner cash flow and are helpful to the elderly and/or disabled people who may want to live close to family members.

Regarding development, the City has a AAA bond rating and comparatively low building fees, which creates a positive lending environment. The result of which can be seen in a recent uptick in affordable housing development throughout the city.

The City has also adopted The Community Revitalization Tax Relief where property owners who intend to substantially rehabilitate a building located in downtown may apply to the City for a period of temporary, finite, tax relief during which the property tax on the structure would not increase as a result of its substantial rehabilitation (between 5 and 13 years). In exchange for the relief, the property owner grants a covenant ensuring there is a public benefit to the rehabilitation. Given that downtown Nashua contains mill buildings ripe for conversion, this incentive may facilitate affordable housing development (as was the case for 30 Front Street/Cotton Mill). The City also offers tax exemptions for many segments of the community reducing the assessed value of the property as follows: blind exemption \$75,000; disabled exemption \$155,000; elderly exemption ranges from \$155,000-\$225,000. In the past year, the city increased the elderly exemption amount and will continue to review credits to determine increases as necessary.

The Housing Appeals Board was signed into law in the summer of 2019 and became effective January 1, 2021 providing an expedited route for appeals to land use board decisions. This law requires decisions be made in 90 days, instead of the current system which takes more than a year and many times several years for a decision.

Lastly, the City worked with the Governor's Office for the successful designation of two of our most distressed Census Tracts as Opportunity Zones to spur economic development. Opportunity Fund investors will receive a deferral of taxes owed on unrealized capital. Further after 10 years, the investor will be eligible for an increase in the basis of their original investment, meaning significantly lower taxes at the end of the term.

Discussion:

Building on these efforts, during this Plan year the City will be launching an Affordable Housing Trust Fund. We recently conducted a housing study that highlighted several steps the City can take to ameliorate existing policies and practices. This study was perfectly timed to help inform the City Master Planning efforts. The Master Plan is over 20 years old and is currently underway. During this Plan year we will focus on funding sources for the HTF, as well as developing policies and procedures. We are also working with a consultant to develop an Inclusionary Zoning policy. The intent is for the IZ to help fund the HTF. Following closely behind these steps will be the process of updating Nashua's Land Use Codes to reflect the updated Master Plan. The hope is to allow more flexible development (i.e.

smaller lots, higher density, etc) to alleviate the high cost of housing development.

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AP-85 Other Actions – 91.220(k)

Introduction:

The Action Plan describes, in detail, the activities and actions the City is planning for the upcoming year. Following is additional information on actions not covered elsewhere in the Plan.

Actions planned to address obstacles to meeting underserved needs

The greatest obstacle to meeting underserved needs is the limited availability of funding. Federal and local budget cuts, a competitive housing market and political climate have resulted in the increased need for services, economic opportunities and affordable housing. While the City relies on CDBG and HOME, these funds alone are not enough to address all needs. The City addresses this obstacle by pursuing other grant opportunities, such as the Lead Paint & Healthy Homes Program; collaborating with neighboring communities to share “lessons learned”; using best practice guidelines, systems, and previously created documents. Partnering to leverage resources toward common goals is a major component in meeting underserved needs. Streamlining services by using technology also helps provide improved services.

Actions planned to foster and maintain affordable housing

The City works to maintain affordable housing through the oversight and management of its existing HOME assisted units, directing HOME funds to new projects, and by providing CDBG grants to providers of affordable housing. Many of the City’s HOME assisted projects are aging and in need of capital repairs. To this end, the City has modified the legal agreements for projects that have achieved the affordability period (in most cases 20+ years), thereby allowing new HOME funds to be applied, creating new affordability periods and long-term quality housing. Addressing substandard rental housing continues to be a high need. Code Enforcement had a total of 924 Housing Complaints this past fiscal year and currently has 503 with a few months remaining. The majority of these complaints are housing related and located in the City’s Census Tracts with the highest concentrations of low-income, rental occupied units. These statistics, along with frequent inquiries related to programs for rental rehab, demonstrated the need/demand to create a rental rehab program. The City piloted a program a few years ago and has continued to fund it, now for the third year in this Action Plan. The City leverages the small fund with owner contributions, the state lead-paint fund and its own lead-paint/healthy homes program.

Actions planned to reduce lead-based paint hazards

Since 2007, the City, through the Urban Programs Department, has been successful in securing grant funding from HUD’s Office of Healthy Homes and Lead Hazard Control to address lead paint and other health hazards in units occupied by low-moderate income households. As of this writing the City has been awarded a total of \$11,700,000 under five separate grants. Our most recent grant award of \$5.7 million will address approximately 250 units. As of December 2021, 51 units have been mitigated, and an additional 83 units will be addressed by June 2023. Nashua has a very aggressive and successful lead paint program. Complying with HUD’s Lead Safe Housing Rule, certain work will trigger the need to address lead paint. In all other projects, the City requires contractors to use lead safe work practices and EPA’s Renovate, Repair and Paint protocols. The City of Nashua's Division of Public Health and Community Services provides free blood lead screenings, education and home visits with a specialist from the Environmental Health Department. Nurses offer one-on one education with parents of children

with elevated blood lead levels. The City's Code Enforcement Department has been trained to recognize potential lead hazards, especially in homes where young children reside, and make referrals to the Urban Programs Department. The City also recently entered into a data sharing agreement with the state to obtain information directly regarding lead-poisoned children. This will help streamline and expedite our response.

Actions planned to reduce the number of poverty-level families

The City's goals to reduce the number of poverty-level families include supporting agencies that serve these individuals directly. Both CDBG and general fund support public service activities and agencies that are providing services to break the cycle of poverty. These services include job training, counseling, budgeting/life skills, child care and more. CDBG & HOME also directly impacts households, living at or below the poverty level, by reducing the cost of housing, improving energy efficiency, public transportation and health care assistance.

This Action Plan year includes assistance to? Adult Learning Center and Nashua Children's Home - two entities that provide transitional housing, job counseling and life skills. These agencies specifically aim to reduce families in poverty.

Additionally, the City's Economic Development Department works diligently to grow the City's economy, specifically by working to redevelop vacant or underperforming commercial corridors. Developing a variety of businesses in Nashua is critical to providing living-wage jobs for a diverse population with multiple jobs skills and experiences. Economic Development is accomplished by utilizing many different funding sources including, but not limited to, the CDBG Economic Development Fund, tax-increment financing (TIF) and local funds. Urban Programs has been working more closely with Economic Development to explore HUD funded opportunities that may improve economic opportunities for low-income individuals.

Through the CARES Act, the City used the majority of its CDBG-CV funding to assist microenterprise businesses, with either low-moderate income owners or retaining low-moderate income jobs. Forty businesses have received assistance.

Actions planned to develop institutional structure

The City actively seeks partnerships with agencies in the community who can help overcome the gaps listed above. Leveraging not only funding, but expertise is an intentional outcome of partnerships. Neighborworks of Southern NH developed a strategic plan to focus their efforts in the "Tree Streets" neighborhood and has been working to revitalize that neighborhood. Habitat for Humanity recently completed two projects on Chestnut Street and other non-profits are carrying out similar work.

The Greater Nashua Continuum of Care (GNCO) application articulates its homeless and homeless prevention strategies, based on the data collected, its consultation with homeless assistance providers, homeless persons and other organizations collecting and analyzing relevant information. These strategies include the ongoing development and maintenance of a funnel-shaped continuum, beginning

with outreach and assessment efforts, aimed at identifying homeless in the community and assessing their needs; connecting them to their most urgent shelter and service needs; assisting them to transition from emergency shelter to transitional, permanent supportive or independent housing; and aggressively pursuing methods and strategies to prevent homelessness-both for the chronic homeless and for those at risk of homelessness.

The GNCOC meets monthly to prioritize unmet service needs and work to develop a system of prevention, intervention, outreach assessment, direct care and aftercare for homeless individuals and families. Recently, there has been an increased push to promote the “2-1-1” system. This comprehensive system is available online or by phone and connect individuals to services throughout the community. The GNCOC has also been working to increase the level of wrap-around services for homeless and at-risk households, and have started a “Coordinated Access” line for homeless individuals to call for better connection to resources. There have been arrangements to conduct outreach in hospital emergency departments that has shown some success in linking individuals to needed services. Lastly, the GNCOC members, service agencies and the City are always seeking new/increased funding opportunities and ways to implement creative programs with the limited funding available.

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

During COVID-19, the City implemented numerous frameworks to enhance coordination between public and private housing and social service agencies. First, these organizations were integrated within the City's Incident Command System in order to share information and resources during emergency response and recovery. Frequent conference calls were held to provide information and obtain information from organizations supporting low-moderate income residents. Second, an online collaboration platform was established to allow these organizations to share information with each other during crisis situations. Finally, a new organization, Community Connections, was established to enable all community organizations to collaborate during COVID-19 recovery and to prepare for future disasters.

In September 2020, Nashua kicked-off an update to its Master Plan. Imagine Nashua will combine comprehensive community engagement with major plans created in the past 20 years to create an innovative vision for the future of Nashua. This plan will focus on equity, resilience, and climate protection. The Master Planning process builds on existing coordination among agencies, however also strengthens and amplifies the need to coordinate.

The City will be working closely with the GNCOC to develop priorities for the recent HOME ARP allocation. The first step included the UPD Manager meeting with the Executive Committee. Next will be a survey on needs, then the UPD Manager will meet with the entire committee. These efforts will help enhance coordination, as it aligns the GNCOC's goals more closely with the City's.

Program Specific Requirements

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

Introduction:

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies the balance of program income receipted to date during PY2021 (FY22) that is available to fund activities in this Plan. This information was taken from the PR09 report as of this writing. Repaid loans in the amount of \$78,255.00 were receipted; program income for FY22 was estimated to be \$45,000; PI above and beyond the estimate is split between the owner-occupied and rental improvement housing rehab programs. These funds (currently \$128,750) will be carried forward into this Plan year for use under qualifying rehab.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	128,750?
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	128,750

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan (PY20-22).	100%

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

None

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The City hopes to launch home buyer assistance in this Plan year. We were unable to roll out a program in the past and are working to amend our policies to ensure they complement responsible primary lender rules. The City's existing/approved Resale/Recapture Policy is available on our website at <https://www.nashuanh.gov/1405/HOME-Program>.

Eligible applicants must be low-income households (<80% AMI). They need not be a first-time home buyer or current resident of Nashua. Nashua will utilize the purchase HUD limits in accordance with 92.254(a)(2)(iii). The City does not plan to solicit applications from buyers directly, rather the developer will be responsible for that function. The developer must ensure a fair and equitable process. Developer proposals must outline how the home buyers will be identified. The City will post buyer eligibility information for each project, including who to contact and how to apply. The City anticipates home ownership development occurring primarily through non-profit entities with existing missions/criteria for the population they intend to serve, as identified in their proposal. There are no specific plans to limit beneficiaries to a particular segment of the low-income population, however in some cases, a developer may propose to give preference to a certain population, such as Veterans, homeless, victims of domestic abuse, disabled households, etc. If a proposal is submitted that limits beneficiaries, the limitation would be made public through the local funding approval process (via the Board of Aldermen), allowing the public an opportunity to comment. The City will publicly advertise the amount of funds available at least annually on our website.

The City will apply a Recapture provision when there is a direct subsidy to the buyer. **Direct HOME subsidy** is the amount of HOME assistance, *including any program income*, that enabled the homebuyer to buy the unit. The direct subsidy includes down payment, closing costs, interest subsidies, or other HOME assistance provided directly to the homebuyer. In addition, direct subsidy includes any assistance that reduced the purchase price from fair market value to an affordable price. If HOME funds are used for the cost of developing a property and the unit is sold below fair market value the difference between the fair market value and the purchase price is considered to be directly attributable to the HOME subsidy.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

When a buyer is not directly assisted, recapture is not allowed as detailed in 24 CFR Part 92.254(a)(5)(i). For example, if the City provides HOME assistance to the developer to subsidize development and the home is sold at fair market value, the buyer is not directly assisted, and resale

provisions must be applied. Please see the attached policy for the full details of the City's Resale Provisions.

- 4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

None

Other Program Specific requirements, not listed above include:

- a) CDBG origin year grant: The reprogrammed amounts below are EN funds only. Breakdown of Prior Year funds:?

FY22 The PLUS Company	\$10,000
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Prior Year activities carried forward: ?
FY17 & 19 Labine Park \$40,000.00
FY20 PAL - reduced in FY22 resolution \$11,370.00
FY20 NSKS \$75,000
FY21 Ash St Futsal Court \$10,000
FY21 Los Amigos park \$15,000
FY21 Sandy Pond Park \$10,000
FY21 HIP O/O – unknown balance at end of FY
FY21 Rental Rehab est. \$128,749.50
FY21 Front Door Agency \$30,000
FY22 Home Buyer Assistance \$55,000

- b) Program income expected to be received during the program year: As shown in AP-15, the City anticipates \$45,000 in CDBG program income derived from the repayment of housing rehab loans.

- c) Program income amounts not included in a prior action plan: None
- d) Program income previously generated under a lump sum drawdown agreement for which a new agreement will be executed during the program year pursuant to 24 CFR 570.513(b): None
- e) Reimbursements other than program income, made to the local account: None
- f) Overall benefit measurement: PY20 100%; PY21 100%; PY22 100%

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