

Executive Summary

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

1. Introduction

Every five years, HUD requires cities that receive direct allocation of funds, Entitlement Communities, to create a Consolidated Plan. The City of Lawrence as an Entitlement Community has undertaken this HUD-required planning process. The planning process led by the Community Development Department sought to identify community needs and establish affordable housing and community development priorities through consultations and community input.

This Consolidated Plan will guide the City of Lawrence's strategic investment of federal Community Development Block Grant (CDBG) funds, HOME Investment Partnership funds, and Emergency Solutions Grants (ESG) during the City's Fiscal Years 2020-2024.

Additionally, this document includes the 4th year Action Plan, which details the projects to be undertaken during the program year commencing on July 1, 2023 and concluding on June 30, 2024.

During the development of the Consolidated Plan, Lawrence, like cities across the nation, began to see the impact of the COVID 19 pandemic. The City re-evaluated its initial priorities and strategic investments in light of the emerging needs and on-going HUD guidance. This plan reflects ongoing adjustments.

2. Summarize the objectives and outcomes identified in the Plan

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

Through data gathered from the citizen participation process, existing community reports, and quantitative data, the City identified the following high priority needs for the investment of federal funds:

- Create economic opportunity and spur economic growth.
- Work to enhance the character and diversity of our city's neighborhood through housing production and preservation.
- Support for small businesses impacted by the COVID-19 pandemic.

- Pathways to economic stability for low income households through education, job training, small business development, and job creation; and
- Housing development through the production of new units to meet increasing population and through improvements to an aged housing stock; and
- Continued support of families impacted by loss of income as a result of COVID-19.
- Improving health outcomes for individuals and advancing public health strategy for small businesses impacted by the COVID-19 pandemic. es that address health inequities and improve upon social and economic factors of poor health; and
- Continued investment in parks, public spaces, and infrastructure.

3. Evaluation of past performance

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

The COVID-19 pandemic continued to have an impact on performance, especially in the Homeowner Rehabilitation program. Staff contracted COVID, homeowners or tenants contracted COVID, contractors contracted COVID, all of which delayed work. The surge in sale prices, inflation, and the national high interest rates for houses made homeownership unattainable for many of our residents even with the increase in downpayment assistance that we implemented this past year. To help mitigate these factors, we will increase the amount of downpayment assistance again this year. Our non-profit public service agencies were able to pivot under the pandemic and provide the programming, sometimes virtually. Unfortunately, we were not able to do any site visits while the programs were operating.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

For this fourth year Annual Action Plan (HUD Program Year 2023/City's Fiscal Year 2024), the CDD held a public hearing and an application workshop in early and mid-December to report on the work performed with prior year's funding, as well as to solicit public comment on the proposed funding use for the next fiscal year's funding. Additionally, the draft plan was posted on the City Website in early April 2023 for the mandated thirty-day public comment period. Legal ads were placed in the local mainstream newspaper and two of the area's bilingual newspapers, informing the public about the availability of the draft plan at the Office of Planning and Development, the City Clerk's Office, and The Center (formerly the Senior Center); this latter one serves as a hub for food distribution and vaccination, with heightened increased foot traffic. Lastly, staff went before City Council and the Budget and Finance Committee meeting in April as well as requested a public hearing for in early May to approve the FY24 proposed budget. All council hearings and the public hearing are conducted in person and broadcast live on Facebook and YouTube, and the public has the opportunity to share their comments in the chat

box. For the May public hearing, the public has the opportunity to voice any concerns during this City Council meeting.

5. Summary of public comments

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

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

7. Summary

The City of Lawrence has continually engaged with its residents, neighborhood organizations, non-profit agencies, and strategic partners to identify investments that will address existing community need. While the Consolidated Plan requires a formal consultation process, the priorities identified within the Consolidated Plan are reflective of the ongoing work of Mayor DePeña's administration. This ongoing commitment to inclusive partnerships seeks to make Lawrence a healthier community for all.

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 |
|---------------------|----------|----------------------------------|
| Lead Agency | LAWRENCE | |
| CDBG Administrator | LAWRENCE | Community Development Department |
| HOPWA Administrator | | |
| HOME Administrator | LAWRENCE | Community Development Department |
| ESG Administrator | LAWRENCE | Community Development Department |

Table 1 – Responsible Agencies

Narrative (optional)

The Community Development Department (CDD) is the City Department charged with the administration of the federal Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and the Emergency Solutions Grant. CDD prepares all plans and reports, provides financial oversight, and monitors program compliance.

Organizationally the CDD is within the umbrella of the larger municipal Office of Planning and Development. This organizational structure permits the CDD to coordinate its efforts with Business and Economic Development, Inspectional Services, and Planning which are also part of the Office of Planning and Development. CDD also coordinates and collaborates with the city Department of Public Health, Public Works, Recreation, Council on Aging and The Center (formerly known as the Senior Center), Police, and Public Schools.

The coordination of City departments along with the public-private partnerships, such as the MassDevelopment Transformative Development Initiative (TDI), the Lawrence Mayor's Health Task Force (MHTF), the Lawrence Partnership, and non-profit organizations such as Groundwork Lawrence, Lawrence CommunityWorks, and Greater Lawrence Community Action Council, assist in the development of performance-based strategies and the implementation of specific programs or projects identified in the Consolidated Plan.

CDD additionally is the coordinating agent for Lawrence Homeless providers within the MA Balance of State Continuum of Care and assists with local coordinating meeting agendas, priority plans, and annual Point in Time count.

CDD uses Sub-recipient organizations, identified through an RFP process, to implement programs and projects identified in the Consolidated Plan. These Subrecipients are instrumental in the successful fulfillment of Consolidated Plan priorities and goals. CDD also makes funding available to non-profit and

for-profit developers to undertake residential and commercial development projects to address the needs and priorities identified in the Consolidated Plan.

Consolidated Plan Public Contact Information

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

1. Introduction

The City of Lawrence through its Community Development Department undertook extensive consultations with relevant agencies, organizations, and community-based groups to obtain input on priority needs, recommended strategies, and investment opportunities. The consultations were conducted through a variety of methods including one-on-one interviews, stakeholder sessions, and meetings with existing networks.

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

The City of Lawrence has taken actions to coordinate and streamline municipal efforts and enhance coordination with health, housing, and service agencies. The reorganization of City departments and the formation of multi-departmental task forces with defined tasks and goals has led to a level of coordination that has been recognized and rewarded by state and national organizations. Progressive initiatives from the Community Development Department, the Lawrence Mayor's Health Task Force, and the Homelessness Initiatives Coordinator implemented activities to address the housing and health needs of Lawrence residents. Since the onset of the COVID-19 pandemic, the City of Lawrence, nonprofit partners, legislators, state and regional agencies, and caring stakeholders, organized as working groups under the "We Are Lawrence" communitywide platform to coordinate emergency response efforts to mitigate issues related to financial and housing stability, homeless shelters, youth and schools (education), food access, behavioral health, community outreach, policies, small business assistance, and organizational sustainability. The Community Development Department and the Mayor's Health Task Force actively participate in these groups, which has helped to inform the allocation of entitlement and CARES Act funds.

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.

Since 2013, Lawrence has been part of the "Balance of State Continuum of Care," which it joined in the interest of efficiency as HUD requirements for individual continuums became increasingly challenging. Notwithstanding their participation in the Balance of State, the City of Lawrence continues to meet with local homeless providers to develop, enhance and coordinate local strategies. At these meetings, participating agencies discuss current needs and opportunities to coordinate an effective response.

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

As a member of the Balance of State Continuum of Care (CoC), the City and its network of providers are aware and engaged with the Balance of State CoC. This engagement permits the CDD as the administrator of ESG funds to ensure that ESG funding activities adhere to the policies and procedures for HMIS. City staff and staff from local agencies participate in the monthly Balance of State Continuum of Care Planning Group meetings and also participate in various committees.

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

Table 2 – Agencies, groups, organizations who participated

| | | |
|---|--|---|
| 1 | Agency/Group/Organization | Groundwork Lawrence |
| | Agency/Group/Organization Type | Housing Services - Housing Services-Children Services-Education Services-Employment Agency - Management of Public Land or Water Resources |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Type of Consultation: One on one with Executive Director Agency Description: Groundwork Lawrence continues to focus on park stewardship and recreational facilities. Expanded mission to include fresh food access, SNAP, and community gardens. Challenges include lack of resources- financial and human. More and more people working two jobs or in transition. Need for additional open space, the need to tie existing open space together, need for ongoing maintenance of existing parks, education, job training, ESOL, and fresh food access. The consultation also highlighted the need to be accurately counted in the upcoming census. Anticipated Outcomes: Continued participation with City on green space initiatives, furtherance of Green City activities. Expanding reach of healthy food access and farmers markets. |
| 2 | Agency/Group/Organization | GREATER LAWRENCE COMMUNITY ACTION COUNCIL |
| | Agency/Group/Organization Type | Housing Services - Housing Services-homeless Services-Health Services-Employment |

| | | |
|---|--|---|
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Homeless Needs - Families with children Non-Homeless Special Needs Anti-poverty Strategy Lead-based Paint Strategy |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | One on one with Executive Director Agency Description: Community Action Agency seeks to build pathways to stability and prosperity. Continue to provide on support programs- food access, childcare, and fuel assistance but seek to expand access to English language skills, education, and employment training and readiness. Lack of affordable quality housing complicates every aspect. Homeless services continue to be a major need. Continued need for housing code enforcement, rehabilitation including de-leading. New ESOL classes immediately oversubscribed. Immigration services are desperately needed. Anticipated Outcomes: Increased funding for homeless services, partnership with employers, improvements to downtown that create vibrancy and provide opportunities. |
| 3 | Agency/Group/Organization | Lawrence Council on Aging |
| | Agency/Group/Organization Type | Services-Elderly Persons Services-Health Grantee Department |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Public Housing Needs Non-Homeless Special Needs Market Analysis |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | One on one meeting with Executive Director Agency Description: Area Agency on Aging Consultation Highlights: Majority of program participants are low-income Latinos. The Senior Center has transitioned into community. Funding to support health initiatives and transportation. Long term goal to expand facility to incorporate more programming. |

| | | |
|---|--|--|
| 4 | Agency/Group/Organization | Merrimack Valley Planning Commission |
| | Agency/Group/Organization Type | Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Agency - Managing Flood Prone Areas Agency - Management of Public Land or Water Resources Agency - Emergency Management Regional organization Planning organization |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Market Analysis Economic Development Transportation Planning |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | One on one meetings with key staff. The current focus is two-fold - affordable housing production and Targeted Economic Development. The need to increase the supply of housing at all price points but most especially affordable units. Seek to implement a housing production plan that includes deed-restricted owner-occupied housing. The need for resources to support a full time Economic Development Specialist (to serve 3 communities). Build capacity to support small, emerging business. Anticipated Outcome: Continued partnership on regional solutions that result in the implementation of the housing production plan, the Lawrence Fabric Innovation, and the Targeted Economic Development Strategies. |
| 5 | Agency/Group/Organization | Lawrence Partnership |
| | Agency/Group/Organization Type | Services-Education Services-Employment Services - Narrowing the Digital Divide |
| | What section of the Plan was addressed by Consultation? | Market Analysis Economic Development |

| | | |
|---|--|--|
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | One on one meeting with Executive Director. Organization focused on underutilization of properties, improvements to infrastructure, and creating a sense of place. Build private sector commitments and investments; seek streamlining of government processes to assist in small business development. TDI represents a significant opportunity to the downtown. Strategic involvement of educational institutions in workforce development and alignment. Anticipated Outcomes: Continue engagement of city in development process and workforce development. Use of CDBG in infrastructure projects. |
| 6 | Agency/Group/Organization | Lawrence Housing Authority |
| | Agency/Group/Organization Type | Housing PHA Services - Housing |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Public Housing Needs Market Analysis Anti-poverty Strategy |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | One on one meeting with PHA Executive Director Highlights: Stock is old and suffers from a significant lack of modernization funding. Need for affordable housing especially acute for elders, disabled, as very little of the PHA stock is ADA compliant. Cuts to Resident Service funding and Drug Elimination grants are problematic. Rental prices continue to rise further complicating the market. Anticipated Outcome: PHA will continue to participate in the Rental Cost Task Force. Also seeking to partner with more human service agencies to address challenges of mental health and substance use issues. |

| | | |
|---|--|--|
| 7 | Agency/Group/Organization | Merrimack Valley YMCA |
| | Agency/Group/Organization Type | Services-Children Services-Elderly Persons Services-homeless Services-Health Services-Education Health Agency |
| | What section of the Plan was addressed by Consultation? | Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Market Analysis Economic Development Anti-poverty Strategy |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | One on one meeting with Executive Director. Agency Description: YMCA has three strategic pillars - youth development, healthy living, and social responsibility. Of particular importance are issues impacting youth - mental health and anxiety. Food insecurity is a continuing challenge within the health and wellness programs. Academic supports are an area of ongoing expansion. Anticipated Outcomes: Expansion of pilot program that addresses the needs of 15-21 year olds. Expansion of food pantry and nutrition/healthy eating programs. |
| 8 | Agency/Group/Organization | LAWRENCE COMMUNITYWORKS INC |
| | Agency/Group/Organization Type | Housing Services - Housing Services-homeless Services-Education Services-Employment |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Market Analysis Economic Development Anti-poverty Strategy |

| | | |
|---|--|---|
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Meeting Agency with Executive Director and Leadership team. Agency Description: Lawrence CommunityWorks (LCW) identified three critical areas of community needs: People - investing in education, training, networking, asset building, and better outcomes for education/parent engagement; Place - infill housing, mill adaptive reuse, and creation of truly affordable housing, downtown revitalization, sidewalks, lighting; Systems - creating a culture that encourages participation by Lawrence families, creates financial incentives, lending circles. Need for bilingual approach, authentic engagement in all systems. Anticipated Outcomes: Continue efforts of Lawrence Working Families, create affordable housing and pathways for families to achieve, expand code enforcement with goal of improving housing stock, eliminate barriers to employment training and jobs. |
| 9 | Agency/Group/Organization | Lawrence Continuum of Care |
| | Agency/Group/Organization Type | Housing Services-Victims of Domestic Violence Services-homeless Services-Health Services - Victims Publicly Funded Institution/System of Care Business Leaders Civic Leaders |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy |

| | |
|---|---|
| <p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p> | <p>The Continuum of Care (CoC) was consulted at a regularly scheduled meeting of the CoC. Agency Description: The Lawrence CoC while part of the larger Balance of State Continuum meets to discuss needs, services, and programming within the City. The participants continue to experience a high demand for supportive services for homeless and at-risk persons. Growing concerns for veterans, human trafficking. More and more families living doubled and tripled up in single rooms. The challenges of stability and impact on education for children. Anticipated Outcome: Goals to continue working to identify and serve young households (18-25 year olds), look to expand barriers to employment including transportation, and explore expanded models of housing development that will produce units that are truly affordable to households at 30% or less AMI.</p> |
|---|---|

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

The City of Lawrence's consultation process was comprehensive and included a wide range of City departments, community-based organizations, and regional institutions.

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 | MA Department of Housing & Community Development | Part of the Balance of State Continuum of Care (BoS CoC), Lawrence's goals match the goals of the BoS CoC. |

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

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

The City of Lawrence has a Citizen Participation Plan that incorporates the majority of HUD Best practices. These successful recommended practices included broadly advertised hearings held at convenient locations during evening hours, a web-based resident survey, utilization of relevant community-focused plans, and an ongoing dialogue with key stakeholder organizations.

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 | Public Meeting | Non-targeted/broad community | 0- local agencies attended the public hearing. CDD provided an overview of the Consolidated Plan process, the Annual Action Plan process and timeline, and to solicit input into community need. This was held on December 1, 2022. | No comments were received. | 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) |
|------------|------------------|------------------------------|---|------------------------------|--|---------------------|
| 2 | Public Meeting | local non-profit agencies | 51 people from various local agencies received detailed information, the CDD staff provided instruction on the (RFP) Request for Proposal process and application submission. This mandatory workshop was held on December 7, 2022. | No comments were received | n/a | |
| 3 | Public Meeting | Non-targeted/broad community | 19- local agencies provided 3 minute presentations on their programs to the Community Development Advisory Board on February 6, 2023. | No comments were received. | 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) |
|------------|------------------|--|---|------------------------------|--|---|
| | | | | | | |
| 4 | Newspaper Ad | Non-English Speaking - Specify other language: Spanish Non-targeted/broad community | A legal notice announcing the availability of the draft Annual Action Plan for public comment was placed in The Eagle Tribune, the local newspaper of largest circulation, in El Mundo a Spanish language newspaper, and in RUMBO an on-line newspaper that is in both Spanish and English. | | | https://rumbone.ws.com/site/ |

| Sort Order | Mode of Outreach | Target of Outreach | Summary of response/attendance | Summary of comments received | Summary of comments not accepted and reasons | URL (If applicable) |
|------------|-------------------|--|--|------------------------------|--|---------------------|
| 5 | Internet Outreach | Non-English Speaking - Specify other language: Spanish Non-targeted/broad community | A notice announcing the availability of the draft Annual Action Plan for public comment was placed the city website along with the Draft Annual Action Plan. | | | |

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The City anticipates receipt of CDBG funds in the amount of approximately \$1,500,000 annually. Those funds are allocated against numerous eligible projects and activities after the City has met its annual Section 108 loan commitment of approximately \$266,000.

As a HOME Investment Partnerships Program Entitlement Community, the City will receive approximately \$900,000 annually to support direct assistance to moderate income homebuyers, to subsidize the development cost of affordable housing projects.

Anticipated Resources

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainder of ConPlan \$ | Narrative Description |
|---------|------------------|--|----------------------------------|--------------------|---------------------------|-----------|---|--|
| | | | Annual Allocation : \$ | Program Income: \$ | Prior Year Resources : \$ | Total: \$ | | |
| CDBG | public - federal | Acquisition Admin and Planning Economic Development Housing Public Improvement s Public Services | 1,551,622 | 0 | 0 | 1,551,622 | 1,551,622 | CDBG funds are anticipated to remain fairly consistent over the 5 year period. |

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainer 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 | 944,075 | 14,058 | 0 | 958,133 | 940,000 | HOME funds are anticipated to remain fairly consistent over the 5 year period. |
| HOPWA | public - federal | Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA | 0 | 0 | 0 | 0 | 0 | The City is not a HOPWA grantee |

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainer of ConPlan \$ | Narrative Description |
|---------|------------------|--|----------------------------------|--------------------|---------------------------|-----------|--|--|
| | | | Annual Allocation : \$ | Program Income: \$ | Prior Year Resources : \$ | Total: \$ | | |
| ESG | public - federal | Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing | 0 | 0 | 283,706 | 283,706 | 0 | ESG funds are not expected to be received. |

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

The City of Lawrence anticipates CDBG funds will leverage additional resources. Non-Entitlement funds that will be used to further the goals of the Annual Action Plan are anticipated to be received from private and public sources - federal, state, and local. The following leveraged resources are anticipated during this Action Plan year:

City General Funds: The annual City budget commits resources for the priority activities including Public Parks, Facilities, and Infrastructure, and the Health Department. The City anticipates some Chapter 90 funding will be used as leverage for additional DOT funding.

Affordable Housing Resources: Affordable Housing Developments are likely to utilize a variety of State Housing Resources including Housing Bond funds, Mass Rental Voucher program, and private mortgage financing, Low-Income Housing Tax Credits, as well as State and Federal Historic Tax Credits.

Philanthropy: Private funding from national, state, and local funders including the United Way and Private Foundations, and other private donors support the non-profit community, and CDBG resources are used by non-profits to leverage funding from these private sources.

State: The City will be utilizing State funding previously awarded under PARC, Massworks, and various

DPH awards to support park and roadway developments and public health initiatives.

Section 8 Funds: Section 8 is administered by the Lawrence Housing Authority and provides rental subsidies.

Continuum of Care Fund: Project funds awarded by the MA Balance of State Continuum of Care to non-profit human service providers to assist in housing and services to homeless persons.

The City is exempt from the HOME match requirement.

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 Housing Production plan (2018-2022) specifically recommends the use of publicly- owned land, including properties taken for back taxes, to address the housing needs identified during the Consolidated Planning process. The specific Action steps detailed within the plan include an inventory of publicly land to determine suitability and availability of properties for residential development as well as the consideration of retro-fitting current municipal properties for residential use.

Discussion

The priorities identified within the Strategic Plan are the outcome of an extensive, comprehensive effort to identify community needs. The Annual action plan allocates the available resources available to meet those priority needs. The City of Lawrence's investments will leverage extensive public and private funds to address the economic development, affordable housing, public park and infrastructure priorities, and to meet the needs of vulnerable populations.

The City did not receive an allocation of ESG funds for PY2023 but we will continue to spend out our previous allocations.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

| Sort Order | Goal Name | Start Year | End Year | Category | Geographic Area | Needs Addressed | Funding | Goal Outcome Indicator |
|------------|--|------------|----------|-----------------------------------|-----------------|--|-----------------------------------|---|
| 2 | Affordable Housing | 2020 | 2024 | Affordable Housing Homeless | | Affordable Housing | CDBG: \$93,672 HOME: \$863,726 | Rental units constructed: 11 Household Housing Unit Homeowner Housing Rehabilitated: 10 Household Housing Unit Direct Financial Assistance to Homebuyers: 0 Households Assisted |
| 3 | Public Infrastructure, Facilities, and Parks | 2020 | 2024 | Non-Housing Community Development | | Public Facilities, Infrastructure, and Parks | CDBG: \$650,000 | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1 Persons Assisted |

| Sort Order | Goal Name | Start Year | End Year | Category | Geographic Area | Needs Addressed | Funding | Goal Outcome Indicator |
|------------|--------------------|------------|----------|--|-----------------|-----------------------------|---|--|
| 5 | Public Services | 2020 | 2024 | Homeless Non-Homeless Special Needs | | Public Services | CDBG: \$213,743 | Public service activities other than Low/Moderate Income Housing Benefit: 213 Persons Assisted |
| 6 | Homeless Services | 2020 | 2024 | Homeless | | Homeless Services | CDBG: \$10,000 ESG: \$0 | Homelessness Prevention: 14 Persons Assisted |
| 7 | Planning and Admin | 2020 | 2024 | Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development | | Planning and Administration | CDBG: \$310,324 HOME: \$94,408 | Other: 1 Other |

Table 6 – Goals Summary

Goal Descriptions

| | | |
|---|-------------------------|--|
| 2 | Goal Name | Affordable Housing |
| | Goal Description | |
| 3 | Goal Name | Public Infrastructure, Facilities, and Parks |
| | Goal Description | |
| 5 | Goal Name | Public Services |
| | Goal Description | |

| | | |
|----------|-------------------------|--------------------|
| 6 | Goal Name | Homeless Services |
| | Goal Description | |
| 7 | Goal Name | Planning and Admin |
| | Goal Description | |

Projects

AP-35 Projects – 91.220(d)

Introduction

In this fourth year of the 2020-2024 (fiscal 2021-2025) Consolidated Plan, the City has identified strategic investments that further the Consolidated Plan goals. The table below details the program and the dollars to be invested along with the Consolidated Planning goal to be achieved.

Projects

| # | Project Name |
|---|---|
| 1 | Housing Rehabilitation |
| 2 | Administration |
| 3 | Park Improvements |
| 4 | Public Facilities and Infrastructure Improvements |
| 5 | Public Services |
| 6 | Section 108 Loan Payment |
| 7 | Housing Development |

Table 7 - Project Information

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

The Action Plan uses the priorities set forth in the 5-Year Consolidated Plan.

AP-38 Project Summary
Project Summary Information

| | | |
|--------------------|--|---|
| 1 | Project Name | Housing Rehabilitation |
| | Target Area | |
| | Goals Supported | Affordable Housing |
| | Needs Addressed | Affordable Housing |
| | Funding | CDBG: \$93,672 HOME: \$172,114 |
| | Description | Housing rehabilitation for income eligible homeowners often used in conjunction with the Lead Abatement grant from the Office of Healthy Homes and Lead Hazard Control. |
| | Target Date | 6/30/2024 |
| | Estimate the number and type of families that will benefit from the proposed activities | 12 low-moderate income families |
| | Location Description | City-wide |
| 2 | Planned Activities | Rehab work to bring property up to state/local code. |
| | Project Name | Administration |
| | Target Area | |
| | Goals Supported | Planning and Admin |
| | Needs Addressed | Planning and Administration |
| | Funding | CDBG: \$310,324 HOME: \$94,407 |
| | Description | Administrative costs to oversee CDBG and HOME grants |
| | Target Date | 6/30/2024 |
| | Estimate the number and type of families that will benefit from the proposed activities | |
| 3 | Location Description | 12 Methuen Street, Lawrence, MA |
| | Planned Activities | Salaries, benefits, lease of space, custodial services, consultants, office supplies, memberships, travel, employee training, and audit. |
| | Project Name | Park Improvements |
| Target Area | | |
| | Goals Supported | Public Infrastructure, Facilities, and Parks |

| | | |
|---|--|--|
| | Needs Addressed | Public Facilities, Infrastructure, and Parks |
| | Funding | CDBG: \$575,000 |
| | Description | Renovations to parks often used in conjunction with state grants. |
| | Target Date | 6/30/2024 |
| | Estimate the number and type of families that will benefit from the proposed activities | All residents |
| | Location Description | City-wide |
| | Planned Activities | Renovations to existing public parks. |
| 4 | Project Name | Public Facilities and Infrastructure Improvements |
| | Target Area | |
| | Goals Supported | Public Infrastructure, Facilities, and Parks |
| | Needs Addressed | Public Facilities, Infrastructure, and Parks |
| | Funding | CDBG: \$75,000 |
| | Description | Improvements to public facilities and infrastructure. |
| | Target Date | 6/30/2024 |
| | Estimate the number and type of families that will benefit from the proposed activities | 100 |
| | Location Description | City-wide |
| | Planned Activities | Improvements to public facilities and infrastructure. |
| 5 | Project Name | Public Services |
| | Target Area | |
| | Goals Supported | Public Services |
| | Needs Addressed | Public Services |
| | Funding | CDBG: \$223,743 |
| | Description | Public service activities to serve income eligible youth and adults. |
| | Target Date | 6/30/2024 |

| | | |
|----------|--|---|
| | Estimate the number and type of families that will benefit from the proposed activities | 223 low-moderate income individuals |
| | Location Description | City-wide |
| | Planned Activities | Various public service activities including ESOL classes, citizenship classes, youth recreation, homebuyer education and counseling, youth jobs, assistance to homeless individuals, etc. |
| 6 | Project Name | Section 108 Loan Payment |
| | Target Area | |
| | Goals Supported | Public Infrastructure, Facilities, and Parks |
| | Needs Addressed | Economic Development |
| | Funding | CDBG: \$264,882 |
| | Description | Planned repayment of Gateway Section 108 loan principal and interest. |
| | Target Date | 6/30/2024 |
| | Estimate the number and type of families that will benefit from the proposed activities | 100 |
| | Location Description | Canal Street Lawrence, MA |
| | Planned Activities | Repayment of principal and interest on a non-performing Section 108 loan |
| 7 | Project Name | Housing Development |
| | Target Area | |
| | Goals Supported | Affordable Housing |
| | Needs Addressed | Affordable Housing |
| | Funding | HOME: \$691,611 |
| | Description | Creation of affordable housing units. |
| | Target Date | 6/30/2024 |
| | Estimate the number and type of families that will benefit from the proposed activities | 11 low income families |
| | Location Description | City-wide |

| | | |
|--|---------------------------|--------------------------------------|
| | Planned Activities | Creation of affordable rental units. |
|--|---------------------------|--------------------------------------|

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

The allocation of CDBG resources is targeted to best meet the priority needs of low- and moderate-income persons. Many of the programs funded with CDBG are programs that intended to provide services city-wide. These programs are intended to serve low- and moderate-income persons regardless of their residence. Examples of those programs include Movement City and Urban Adventures. Other investments are made to improve low income areas. In this year's Action Plan those investments include Park Improvements in a low- and moderate-income neighborhood.

Geographic Distribution

| Target Area | Percentage of Funds |
|-------------|---------------------|
| | |

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

A significant proportion of the Annual Entitlement funds is dedicated to pay principal and interest on an existing Section 108 loan. Nearly 15% of the Entitlement grant is committed to the Gateway 108 loan. Public Service programs which serve low income persons regardless of geography are an additional 15% of the CDBG Entitlement amount.

Discussion

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City of Lawrence utilizes both CDBG and HOME funds to support its affordable housing goals. These programs include:

- Existing Homeowner Rehabilitation Program, which funds housing improvements for existing homeowners
- Developer Rental Projects, which are multi-family projects undertaken by developers. Funds are often soft, secondary financing

| One Year Goals for the Number of Households to be Supported | |
|--|----|
| Homeless | 0 |
| Non-Homeless | 21 |
| Special-Needs | 0 |
| Total | 21 |

Table 9 - 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 | 11 |
| Rehab of Existing Units | 10 |
| Acquisition of Existing Units | 0 |
| Total | 21 |

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

Existing data and community consultations clearly identify the need to improve the quality of its aged housing stock and to reduce the impacts of lead hazards. The limited HOME allocation funds a mix of projects to meet both rental and ownership needs and goals. The City will not use sub-recipients, State recipients, Urban County or Consortium members, CHDOs or other entities, to provide the First Time Homebuyer Program assistance.

AP-60 Public Housing – 91.220(h)

Introduction

The Lawrence Housing Authority manages a rental portfolio that includes both federally and state-funded public housing units. In addition, the agency administers federal and state housing vouchers.

The LHA is recognized as a high-performing Public Housing Authority although faces continually challenges of an aged housing stock. The LHA continues to dedicate all available funding towards the modernization of its housing stock.

Actions planned during the next year to address the needs to public housing

While the City of Lawrence's extremely limited resources do not permit it to directly assist the LHA with its Capital Needs. The City has supported the LHA's efforts at the recapitalization and restructuring of its housing portfolio to accomplish needed capital projects and ensure long-term sustainability of the public housing stock. The City undertakes the required environmental review for the LHA's HUD-funded capital projects.

Additionally, the City supports the LHA efforts to increase economic diversity within its resident population and to operate Family Self-Sufficiency programs. The City will continue to engage with the LHA and its residents on the services and supports needed to ensure stability.

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

The LHA has Resident Councils that are regularly consulted regarding management and operational policies as well as facility needs and security issues. The Resident Council and LHA site staff are vital tools in dissemination of information on programs and services available to support economic empowerment and homeownership. CDBG funded programs operated at LHA sites create another opportunity to engage residents and encourage involvement in management and empowerment programs.

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

The LHA is not troubled.

Discussion

The LHA is a critical partner in the provision of affordable housing and efforts to promote economic self-sufficiency. During this Annual Plan period, the City and LHA will seek to identify opportunities to leverage the LHA's capacity to improve the quality of life and to maximize opportunities for residents.

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

Introduction

The City of Lawrence is committed to increasing long-term housing stability and economic self-sufficiency of homeless and at-risk individuals and families. The City has allocated HOME funds to expand the availability of safe affordable rental units and have dedicated CDBG funds community-based programs that seek to promote housing stability and pathways to economic opportunities.

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 Continuum of Care (CoC) uses a centralized intake system and outreach teams to address the needs of homeless persons, with a special emphasis on unsheltered persons. Outreach teams respond to any report of an unsheltered family with children and locate an immediate placement in alternative housing settings. The United Way 2-1-1 Program provides information and referral for families. Information about these services is disseminated through public information announcements, faith-based organizations, and other service providers.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City provides CDBG and ESG funds to support programs that rapidly rehouse persons experiencing homelessness. In keeping with HUD's Best Practices and Housing First models, the City seeks to reduce the number of persons entering emergency shelters. The City also seeks to expand the number of service enriched affordable housing units as data shows such housing units are more effective at stabilizing than transitional housing options.

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

Lawrence joined the Balance of State CoC ten years ago but still conducts monthly meetings to ensure coordination of service providers and to identify any existing gaps in existing services the needs of homeless individuals and families.

As part of the Balance of State CoC Planning Group, the City participates in the Continuum of Care Grant Program application process including the Ranking and Review of applications. This participation

provides the opportunity for the City to prioritize responses to the need of those experiencing homelessness.

The City provides funding for a Housing Assistance program that seeks to shorten the time individuals experience homelessness. ESG funds along with CDBG matching funds are used to both prevent homelessness and to rapidly rehouse those experiencing homelessness. Community Development staff regularly respond to residents seeking assistance with housing needs, providing referrals to appropriate local agencies and service providers. The Community Development Department Implements Rapid Re-housing, Homelessness Prevention, Street Outreach, emergency rental assistance and assists dv victims and fire victims.

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.

The City of Lawrence works with state partners to ensure that people being discharged from publicly funded institutions are not discharged into homelessness. The Massachusetts Department of Mental Health has designated several managers as representatives to the Balance of State CoC and the MA ICHH who work on discharge planning. These managers are responsible for working with and monitoring all CoC providers providing mental health services and they work on discharge planning for participants with severe and chronic mental health issues. Several of the providers are also active CoC members. DMH works with other state agencies and their providers around mental health issues, street outreach and discharge planning. DMH is the state agency responsible for ensuring persons being discharged from the public mental health (MH) system are not discharged to homelessness.

Discussion

AP-70 HOPWA Goals– 91.220 (l)(3)

| One year goals for the number of households to be provided housing through the use of HOPWA for: | |
|--|----------|
| Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family | 0 |
| Tenant-based rental assistance | 0 |
| Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds | 0 |
| Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds | 0 |
| Total | 0 |

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

Introduction:

The data clearly illustrates the lack of adequate affordable housing sufficient to meet Lawrence resident needs. Despite nearly 15% of the year-round housing units being certified as affordable, the supply does not adequately address need - both in sheer number of needed units and in targeting of units to extremely low-income housing.

The City of Lawrence has adopted public policies and programs that encourage residential investment. The City of Lawrence is currently working with the regional metropolitan planning organization to draft a new housing production plan for (2023-2027).

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

At the local level, Lawrence plans to take the following actions to remove barriers to affordable housing including:

- Establishing informational materials for housing developers,
- Building capacity of the housing developers,
- Implementing an expedited permitting process, partnering with Inspectional Services Department to establish expedited housing permits,
- Improving technology to existing online permitting system to expedite the process to make more user friendly.
- Investigating new models of affordable housing,
- Adopting high density zoning regulations, drafting an accessory dwelling unit ordinance
- Utilizing tax title and municipal properties for residential development,
- Maintaining housing choice designation.

Other public policies that serve as barriers to affordable housing are not within the control of the City of Lawrence. These include issues such as the high cost of new construction, environmental hazards in the built-environment, and the age of the existing housing stock. Despite no direct control of these barriers, the City proposes the following actions to lessen the impact of public policies:

- Participation on a regional level to encourage greater housing opportunities
- Utilization of Tax-title and/or Municipal Properties to expand housing and economic opportunities designed to increase resident income

- Utilization of Receivership Program to stabilize affordable housing units
- Establish new TOD housing district at McGovern Station to meet housing requirements.
- Provide development financing to close the “funding gap” created by development costs
- Provide Down Payment and Closing Cost assistance to enable low- and moderate-income buyers to achieve homeownership

Discussion:

The City of Lawrence is currently working with the regional metropolitan planning organization to draft a new housing production plan for (2023-2027). This plan will help identify population and housing trends, as well as provided a list of recommended strategies. In this Annual Action Plan period, the City proposed to continue its policy efforts guided by the efforts with our partners and housing developers to expand its partnerships with housing developers, and provide direct financial assistance to buyers, existing owners, and affordable housing developers.

AP-85 Other Actions – 91.220(k)

Introduction:

This City has adopted a holistic “Health in All” policy to address the socioeconomic factors that are intrinsically connected to community and economic development. The City continues to analyze community need and to structure investments in people and places to improve the quality of life for all Lawrence residents.

Actions planned to address obstacles to meeting underserved needs

The City of Lawrence through partnerships with Community-based organization and multi-sector initiatives such as the Mayor’s Health Task Force, has sought to identify and remove obstacles that prohibit Lawrence residents from accessing needed services. During this program year, the City will continue the following:

- Participation on a regional level to encourage greater housing opportunities throughout the region, expand regional economic opportunities, and coordinate the streamlined and impactful delivery of services throughout the region.
- Partner with Groundwork Lawrence to maximize resident access to healthy food and utilization of public parks, trails, and green space for recreation and physical activity.
- Support the efforts of the Lawrence Partnership to grow the local economy through support for small business and operation of the Training Consortium linking people to training and employment.
- Provide funding to community-based service organizations that deliver essential services to vulnerable populations.

Actions planned to foster and maintain affordable housing

The City has allocated additional CDBG and HOME funds for the furtherance of its affordable housing goals. The City of Lawrence is currently working with the regional metropolitan planning organization to draft a new housing production plan for (2023-2027). These actions include removal of development regulatory barriers, streamlining of the permitting process, amendment of zoning regulations to allow some residential uses by right, reuse of municipal property for residential uses, and support for capacity-building with affordable housing developers.

Actions planned to reduce lead-based paint hazards

The City of Lawrence is focused on reducing the negative impact of environmental hazards in the built environment. The prevalence of lead hazards in Lawrence’s aged housing stock is significant and therefore a priority. Remediation of hazards is accomplished through the following City efforts:

- Operate Mass Housing’s Get the Lead Out Program
- Down payment and closing cost assistance that allows low- and moderate-income buyers to buy a home

- Rehabilitation to support to existing homeowners
- Produce and preserve lead-safe housing units

The City secured a 3.5 year grant through the federal Lead Hazard Control and Healthy Homes program. We are currently accepting application and assisting homeowners with their Lead hazards, and other health and safety violations in their homes. Our outreach is being coordinated through Greater Lawrence Community Action Council and the Mayor's Health Task Force. We have successfully completed 76 Lead safe and code complaint units through our Office of Lead Hazard Control and Healthy Homes Grant program.

Actions planned to reduce the number of poverty-level families

The City of Lawrence is focusing on workforce housing and affordable housing. The City's actions to reduce the number of families living in poverty are to expand efforts to create economic opportunities. The City has been a leader in establishing partnerships and attracting the necessary resources to provide pathways to economic opportunity. Initiatives including the Groundwork Lawrence Environmental Tech Training program, the Workforce Investment Board's Career Centers and the Lawrence Partnership's small business program are integral to providing the support necessary for families to succeed. The City continues to be an active participant in these efforts and seeks to alleviate barriers to resident access to programs and services.

Actions planned to develop institutional structure

Under the leadership of the Mayor's Office, the City has institutionalized initiatives that insure a coordinated approach to furtherance of the HUD goals to improve the quality of life for low- and moderate-income persons, provide decent safe affordable housing, and create economic opportunities. The Office of Planning and Development (which includes the Community Development Department) is an active member of multi-sector initiatives that inform the investment of HUD Entitlement funds. Through continued coordination, the CDBG, HOME and ESG funded activities are able to leverage significant resources and provide meaningful positive outcomes for the residents of Lawrence.

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

Capitalizing on the success of the Working Cities grant awarded by the Federal Reserve Bank of Boston, the City of Lawrence has continued to build coordinated multi-sector partnerships to plan, organize, and implement efforts to respond to community needs. During this Action Plan year, the City will continue to convene and coordinate the efforts of the Mayor's Health Task Force. The City will continue to be an active, engaged participant in the regional efforts of the Merrimack Valley Workforce Investment Board and of the Merrimack Valley Planning Commission. In addition, the City will lead the implementation of

the Housing Production Plan recommendations.

Program Specific Requirements

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

Introduction:

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

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

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

Other CDBG Requirements

| | |
|---|--------|
| 1. The amount of urgent need activities | 0 |
| 2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan. | 70.00% |

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:

The City of Lawrence will only use the forms of investments identified in Section 92.205

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's Resale/Recapture Policy is attached under the Unique Appendices.

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:

The Community Development Department utilizes a Note, recordable Mortgage, and Deed Restriction to secure the HOME investment.

As long as the Borrower remains in compliance with the terms of this Note, the Mortgage, the Loan Agreement and the Affordable If the HOME-assisted homebuyer fails to occupy the unit as his or her principal residence (i.e., unit is rented or vacant), or the home was sold or otherwise transferred during the period of affordability and the applicable recapture provision was not enforced, then the project will be considered in noncompliance. Housing Restriction (collectively "The Loan Documents"), the HOME loan will be forgiven once the affordability period is complete.

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:

The City does not have plans to use any HOME funds to refinance existing debt.

**Emergency Solutions Grant (ESG)
Reference 91.220(l)(4)**

1. Include written standards for providing ESG assistance (may include as attachment)

The City undertakes an ESG program assessment on an annual basis to determine available resources and community need. This evaluation includes an assessment of existing ESG sub-award performance-both expenditures and accomplishments as well as an assessment of the City to efficiently and effectively operate a particular program. If the internal assessment determines that an RFP is warranted, the City issues an RFP soliciting responses from community-based and homeless provider community. Responses are evaluated and awards made.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

Subrecipients chosen by DHCD are permitted to contract with other organizations to provide ESG services. Subrecipients who enter into a contract with DHCD are responsible for all ESG funding made available through that contract. Subrecipients who choose to contract with other organizations are held responsible for ensuring that funding is used in accordance with ESG rules and regulations; this includes, but is not limited to, recordkeeping and reporting requirements. Subrecipients are responsible for monitoring any and all sub ESG projects at least annually. The City of Lawrence has been a direct grantee for ESG funding for the past several years but not for PY2023. The City has issued an RFP in the past and even contacted area agencies who work with the homeless population to discuss the ESG funds. Because of the 100% match requirement, the City has been unable to find a sub-recipient who is willing to administer an ESG funded program over the past several years. Discussions will be ongoing to see how to best deploy the remaining ESG funds.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The City of Lawrence is part of the governance structure of the Balance of State Continuum of Care, and it is our understanding this requirement does not apply to State CoC's (even though it is a goal). However, the City believes that effective implementation of ESG locally will benefit from direct consultation with the homeless or formerly homeless within Lawrence city limits. The City intends to task its Homelessness Initiatives Coordinator with making this contact, which will in turn inform the City's rapid re-housing program. Consultation will continue during implementation of this grant. Further, the City will consider making a consultation process a part of the contract requirements for sub recipients.

5. Describe performance standards for evaluating ESG.

The performance standards will be established as part of the contract with each sub-grantee. The primary performance standard will be placing homeless individuals or families into permanent housing with case management that supports stability. The performance numbers will be based on the City's evaluation and acceptance of sub-grantee proposals. We will balance rent payments with case management as our ultimate goal is a homeless individual or family in a permanent sustained housing solution. After placement in a permanent housing situation our performance goal is 80% of clients maintaining their permanent housing status.

A further factor that must be considered is that the City of Lawrence is formally and legally a member of the Balance of State Continuum of Care and the HUD-funded homeless programs in Lawrence are part of the State's application and rating and ranking priority system in which City representatives are participants. The State receives a separate ESG allocation, and has its own

written standards for the full range of ESG possibilities. The City of Lawrence believes the best approach is to be mindful of the State written standards, and to the extent appropriate follow them, while at the same time, creating certain standards that are specific to Lawrence.

Details about eligible applicants, access to the HOME programs, access to information on the HOME programs, and how funding is determined is discussed in detail in AP-55 Affordable Housing.

