

# City of Lowell Massachusetts



## Consolidated Plan For ESG, CDBG, HOME Programs

FOR THE FIVE-YEAR PERIOD  
July 1, 2025 - June 30, 2030

Office of the City Manager  
Department of Planning and  
Development  
JFK Civic Center,  
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# Executive Summary

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

### 1. Introduction

The Consolidated Plan is the 5-year strategic plan on how the city of Lowell will spend its annual entitlement funds (Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME funds) from the US Department of Housing and Urban Development. This plan covers the 5-year period of local fiscal year 2026-2031.

All of these funds can only be allocated to activities that predominately serve low- and moderate-income households whose incomes are 80% or less of the Area Median Income. Currently 51% of all Lowell households earn below this threshold. The pandemic and its aftereffects affected this population disproportionately. As a result, while the pandemic did not cause low/moderate households to live in poverty it did show that there is greater need than resources available. Therefore, the city took great strides to ensure that the highest level of need will be prioritized. The city conducted a needs assessment in the summer of 2024 and not so surprising results were found. The main points of the results is that low/moderate residents were finding it more difficult to meet their financial obligations.

The City also uses this plan to coordinate with other federal and state grant programs and local initiatives. This plan is the product of public outreach, public hearings, and consultation with agencies, groups and organizations involved in the development of affordable housing, creation of job opportunities for low-income and moderate-income residents and or provisions of services to children, elderly persons, persons with disabilities, and homeless persons. A complete draft of this plan has been made available for public review and comment for a 30 day. The availability of both the draft plan and the final plan is advertised in the local newspaper and the complete documents are available for review on the City's website ([www.lowellma.gov](http://www.lowellma.gov))

### 2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The City is focusing its efforts on the following projects: public facilities, affordable housing, and economic development programs. For public services, the city is prioritizing projects that focus on cost of living/ quality of life issues, food insecurity and programs for special populations. The City will also be prioritizing activities that are targeted to 13 census tracts that will be part of the Neighborhood Revitalization Strategic Area.

HUD has identified a series of outcomes to be achieved through the application of the resources it provides. The primary outcomes that will be achieved as the City provides funding for and or carries out activities each year during the period of this Consolidated Plan will include improving the availability, accessibility and affordability of housing; creating or enhancing suitable living environments and

creating economic opportunities. Detailed descriptions of the foregoing priority needs, Consolidated Plan goals, and anticipated outcomes are described in this document.

### **3. Evaluation of past performance**

The goals and projects identified in this Consolidated Plan represent a continuation and an evolution of the goals that have been included in the City's Consolidated Plans since Lowell became a CDBG entitlement community. Addressing the community's need for affordable housing, especially for households with very low and extremely low incomes, has been a priority Consolidated Plan goal since program inception. Providing assistance to agencies that assist people who are homeless has also been a goal of prior Consolidated Plans. In order to continue the City's participation in the strong community network that has been formed to carry out the goals and actions of this Consolidated Plan identifies addressing homelessness as a priority need and providing support as a key goal. Finally, Lowell's past Consolidated Plans have also given priority to addressing the needs of low income and special needs populations, primarily through the delivery of housing assistance loans and support for social services. As the availability of public and private resources to help those with low incomes and special needs has declined, leaving a gap in programs and services to meet community needs. Given this trend, this Consolidated Plan will seek to continue providing resources to continue providing resources to help address these needs.

### **4. Summary of citizen participation process and consultation process**

The citizen participation program is instrumental in obtaining input from the community and organizations in designing programs that will best meet the needs of the low- and moderate-income populations. At first the city conducted a community needs assessment survey in Khmer, Portuguese, Spanish, and English during the summer of 2024. During this timeframe the city collaborated with non-profit organizations to disseminate the survey. We also held focus groups with general social service providers, ethnic cultural groups, and homeless service providers. The city also held a community meeting on 12/17/2024 targeting the residents of Back Central, Cambodia Town, the Acre, and Downtown residents to gain their input on determining the goals for the NRSA. In addition to these extra steps, the city is in constant communication with our partners to determine the most pressing community needs.

A 30-day notice of a public hearing held at the JFK Civic Center was advertised in the Lowell Sun. The plan was disseminated at the Pollard Library, Clerks Office and DPD Office and published on the City's website.

### **5. Summary of public comments**

As required by HUD rules and regulations, the City of Lowell complies with regulation 24 CFR 91.105, Citizen Participation Plan for local governments. Further discussion about the Citizen Participation process including efforts to broaden participation, for the creation of the Consolidated Plan, along with

public comments and the City's responses is included in the Citizen Participation and Consultation sections of this Plan.

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

**7. Summary**

The Consolidated Plan outlines an array of strategies and tools the City of Lowell will utilize during the five-year period beginning July 1, 2025 and ending June 30, 2031 to address identified community needs as described in this document

## The Process

### PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	LOWELL	City of Lowell Dept. of Planning & Development
HOPWA Administrator	LOWELL	City of Cambridge MA
HOME Administrator	LOWELL	City of Lowell Dept. of Planning & Development
ESG Administrator	LOWELL	City of Lowell Dept. of Planning & Development
HOPWA-C Administrator		City of Lowell Dept. of Planning & Development

**Table 1 – Responsible Agencies**

### Narrative

As the entitlement grantee for the CDBG, HOME, and ESG, programs, The City of Lowell’s Department of Planning and Development (DPD) serves as the lead entity responsible for developing the annual Action Plan. The department had certain staff members serve as liaisons for each grant. The DPD along with other public and private organizations will administer programs and activities through the grant funding (HUD). These additional agencies and organizations are listed in the consultation section of the action plan. The DPD oversees planning, opportunities for economic development, community development, and housing. The department is also responsible for lead paint abatement, the Historic Board, as well as urban renewal programming to meet the executive needs for grants management and address the needs and sentiment of the community. The DPD also monitors current programming quarterly in order to ensure that the activities provided by organizations are effectively meeting community needs.

### Consolidated Plan Public Contact Information

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## **PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)**

### **1. Introduction**

In developing this five-year Consolidated Plan, the Department of Planning and Development (DPD), acting as the lead plan development agency, has consulted with representatives from many different agencies, groups, and organizations involved in the development of affordable housing, creation of job opportunities for low-income and moderate-income residents, and/or provision of services to children, elderly persons, persons with disabilities, and homeless persons. DPD also consulted with public and private agencies that provide assisted housing, health services, and social services to determine what resources are available to address the needs of any persons that are chronically homeless. In addition to the surveys, hearings, and other outreach efforts described above, DPD officials have met with representatives, staff, and members of the Lowell Housing Authority, since the development of the previous Consolidated Plan. These consultations, in conjunction with participation from citizens, provided the direction and scope for this Plan.

### **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 Lowell's Department of Planning and Development worked with numerous organizations within the community's network to develop this Five-Year Consolidated Plan. Those organizations included public/assisted housing providers, private/governmental health, mental health, and service agencies, each of which affects community members of various backgrounds and circumstances. Each participating organization is expected to remain an active stakeholder for city development in the upcoming years. Along with public hearings, community outreach and surveys dispersed to the public, and DPD officials met with members of the Lowell Housing Authority. The City also maintains a Hunger Homeless Commission that is comprised of local and regional food security programs, healthcare institutions, homeless shelters and service providers. Planning officials from abutting towns, EOLHC, and NMCOG are consulted when appropriate as well. The City also encourages the collaborative efforts of organizations applying for monetary assistance. Collaboration ushers in the idea of communal principles to enhance coordination of services amongst agencies but also helps consolidate the reporting requirements of block grant programs.

### **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 city attends the majority of planning meetings with the COC. As a result, we have updated our policies and priorities to align with their strategy. In conjunction with the COC process to include People

with Lived Experience (PLE) the city has been sought the advice of one PLE person working at one of our local partners.

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

If City of Lowell's Department of Planning and Development is the administrator of the City's ESG funds as the City works closely with the local CoC which is now the Balance of State after a year long process to merge. Working together the City can best determine how best to allocate ESG funds as this new process will help develop policies outcomes and coordinated entry. Going forward the city will be having a COC staff member reviewing and recommending the use of the city's ESG allotment.

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

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	Executive Office of Housing and Livable Communities
	<b>Agency/Group/Organization Type</b>	Housing Other government - State
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City attends the meeting for the Balance of State COC and is an active participant to help guide policy decision making. For the ESG program we are required to align our priorities with theirs.
2	<b>Agency/Group/Organization</b>	COMMUNITY TEAMWORK, INC.
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-homeless Services-Education Services-Employment Service-Fair Housing Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Economic Development Anti-poverty Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	CTI was part of the planning team that assisted in determining the priority needs for the ConPlan. They are also part of the City Managers Task Force to end homelessness. Their input in both of these areas were invaluable to assist in enhancing coordination for services going forward.

3	<b>Agency/Group/Organization</b>	Northern Middlesex Council of Governments
	<b>Agency/Group/Organization Type</b>	Housing Regional organization Planning organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Analysis of Impediments
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	NMCOG assisted the city in creating the Master Plan and the Housing Production Plan for the city. The housing production plan will be used to alleviate some of the impediments to construct more housing.
4	<b>Agency/Group/Organization</b>	Lowell Housing Authority
	<b>Agency/Group/Organization Type</b>	Housing PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	LHA has been in constant communication about their needs. The city will continue to work with LHA to connect them with resources and/or provide funding to some of their projects.
5	<b>Agency/Group/Organization</b>	South Middlesex Opportunity Council, Inc.
	<b>Agency/Group/Organization Type</b>	Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Homeless Needs - Families with children Homelessness Needs - Veterans
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	SMOC assisted us in letting us know what the homeless needs were at their shelter in the City. We expect that the city will continue have weekly task force meetings with SMOC to determine the most pressing homeless needs within the city.
6	<b>Agency/Group/Organization</b>	ALTERNATIVE HOUSE
	<b>Agency/Group/Organization Type</b>	Services-Victims of Domestic Violence Services-homeless

	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Homeless Needs - Families with children
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Alternative House was contacted to determine the needs of DV victims. The city will continue to prioritize funds to DV victims
7	<b>Agency/Group/Organization</b>	ELIOT PRESBYTERIAN CHURCH
	<b>Agency/Group/Organization Type</b>	Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Homeless Needs - Chronically homeless
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The church was consulted to determine the needs of the unhoused population. The city will ensure that the priority needs are met as part of the conplan
8	<b>Agency/Group/Organization</b>	LOWELL HOUSE, INC.
	<b>Agency/Group/Organization Type</b>	Services-homeless Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The church was consulted to determine the needs of the unhoused population. The city will ensure that the priority needs are met as part of the conplan
9	<b>Agency/Group/Organization</b>	Greater Lowell Health Alliance
	<b>Agency/Group/Organization Type</b>	Health Agency Regional organization Planning organization Foundation
	<b>What section of the Plan was addressed by Consultation?</b>	Health
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	GLHA strategic plan was consulted to assist us on figuring out the social determinants of health. This research showed that housing and food insecurity were a big issue.

10	<b>Agency/Group/Organization</b>	City of Lowell-DPD-Economic Development Assistance Fund
	<b>Agency/Group/Organization Type</b>	Planning organization Grantee Department
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Economic Development team has been instrumental in determining job training and economic development goals for the NRSA as well as the City as whole.
11	<b>Agency/Group/Organization</b>	City of Lowell DPD HOME Housing Rehab
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Lead-based Paint Strategy Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Housing manager was consulted to assist in determining the affordable housing needs of the community.
12	<b>Agency/Group/Organization</b>	Lowell DPW
	<b>Agency/Group/Organization Type</b>	Agency - Managing Flood Prone Areas Agency - Management of Public Land or Water Resources Grantee Department
	<b>What section of the Plan was addressed by Consultation?</b>	climate resiliency
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The sustainability coordinator has been instrumental in ensuring that our public facility projects will meet the climate resiliency goals. manager and CD director will be working together to apply for a BRIC FEMA grant to assist with alleviation the climate risks to the EJ communities.
13	<b>Agency/Group/Organization</b>	Mass Hire/Greater Lowell Workforce
	<b>Agency/Group/Organization Type</b>	Services-Employment Planning organization

	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Economic Development and CD team have been in constant communication with the career center to determine training opportunities for low skill workers.
14	<b>Agency/Group/Organization</b>	Cambodian Mutual Assistance Association of Greater Lowell, Inc.
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Education Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	CMAA was consulted to assist us in determining the needs of the SE Asian community.
15	<b>Agency/Group/Organization</b>	RARA, INC.
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	RARA assisted us in determining the services needs of people with developmental disabilities.
16	<b>Agency/Group/Organization</b>	Lowell Public School District
	<b>Agency/Group/Organization Type</b>	Services-Children Services-homeless Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Adult Basic Education/ ESL

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	LPS was consulted to assist us to determine the needs of their McKinney Vento clients and low moderate-income students.
17	<b>Agency/Group/Organization</b>	Northeast Legal Aid
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	NE Legal Aid assisted us in determining the needs of their clients facing evictions. We will be focusing ESG dollars on either homeless prevention or Rapid Rehousing depending on the easiest method to get funds out the door.
18	<b>Agency/Group/Organization</b>	LOWELL ASSOCIATION FOR THE BLIND
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	LAB was assisted in highlighting the needs of the legally blind community.
19	<b>Agency/Group/Organization</b>	Mass Alliance of Portuguese Speakers, MAPS-Lowell Immigrant Integration Services
	<b>Agency/Group/Organization Type</b>	Housing Services-Children Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Education Services-Employment Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment HOPWA Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	MAPS assisted us in determining the needs of the Portuguese speaking population in Lowell.

20	<b>Agency/Group/Organization</b>	MassDevelopment
	<b>Agency/Group/Organization Type</b>	Other government - State
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The MassDevelopment TDI fellow assisted in highlighting the needs faced by the business owners in the Acre community.
21	<b>Agency/Group/Organization</b>	City of Lowell- Health Department
	<b>Agency/Group/Organization Type</b>	Housing Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Health Health Agency
	<b>What section of the Plan was addressed by Consultation?</b>	Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Health department has been instrumental in determining the needs of the unhoused community. Additionally, they are part of the review committee to recommend funding allocations for ESG.
22	<b>Agency/Group/Organization</b>	Eliot Community Human Services
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Persons with Disabilities Services-Health Child Welfare Agency
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Eliot Community Health Services assisted us with determining the needs of their clients.

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

All organizations were 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	Executive Office of Housing and Livable communities	The City attends the meeting for the Balance of State COC and is an active participant to help guide policy decision making. For the ESG program we are required to align our priorities with theirs.
Lowell Forward	DPD	Lowell Forward is the city's comprehensive plan. All of our goals are aligned with this plan.
Housing Production Plan: Lowell Homes and Housing	DPD	The HPP was used to develop how the city will allocate funding for housing projects.
Municipal Vulnerability Preparedness	City of Lowell DPW	MVP was used to assist us in determining our climate resiliency goals.
Acre Plan	DPD	This plan is helping us to create the boundaries of the NRSA and determining community needs.
Jam Plan	DPD	This plan is helping us to create the boundaries of the NRSA and determining community needs.
Cambodia Town Neighborhood Plan	DPD	Projects that will occur within this neighborhood will align with those needs
Open Space and Recreation Plan	DPD	All park projects will be funded as long as they align with this plan
GoLowell Multimodal Complete Streets Plan	DPD	The city will place an emphasis on traffic control measures and connectivity to bike lanes and/or rail trail to make pedestrian safety and provide more opportunities for the community to enjoy recreation.
Strategic Plan 2021-2023	Community Teamwork	CTI was able to get regional perspectives on the economic and housing crisis inflicting low- and moderate-income households.
Community Health Improvement Plan	Greater Lowell Health Alliance	This plan classifies housing as a social determinant. As such, the city is providing its focus to assist to expand the healthy homes options within the city.

**Table 3 – Other local / regional / federal planning efforts**

**Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))**

The City of Lowell Consolidated Plan is a citywide plan. Significant efforts were made during the development of Consolidated Plan in order to obtain the cooperation and coordination of units of general local government. Units of general local government were provided multiple opportunities to participate in the creation and implementation of the Consolidated Plan. Consultations are recurrently made with service providers, sub recipients, and their clients involved in the delivery of eligible program activities to eligible populations as well as numerous neighborhood groups and small business owners. These consultations necessarily involved the active participation of members of minority groups, low and moderate-income individuals, persons with limited English skills, and individuals with disabilities. Additionally, the City utilizes the monitoring of programs as an opportunity to gather feedback and information to improve services and to identify and implement consolidated plan goals

**Narrative (optional):**

Consultation was also aided heavily by citizen participation of a local survey as well as public hearings. Local feedback is instrumental in obtaining input from the community and organizations in designing programs that will best meet the needs of the low- and moderate-income populations. As required by the Department of Housing and Urban Development (HUD) Rules and Regulations, the City of Lowell complies with regulation 24 CFR 91.105, Citizen Participation Plan for local governments. Further discussion about the Citizen Participation,

**PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(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 did a variety of outreach activities to create the goals for the consolidated plan

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Surveys	Minorities  Non-English Speaking - Specify other language: Khmer, Spanish, Portuguese  Persons with disabilities  Non-targeted/broad community  Residents of Public and Assisted Housing	The city did a community needs survey over the summer. The city received approximately 325 surveys.	The majority of the results pointed to the how cost of living within the community and barriers to obtain employment within the community.	All of the surveys were accepted.	

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	Minorities  Non-English Speaking - Specify other language: Khmer, Spanish, Portuguese  Residents of Public and Assisted Housing	On December 17, 2024 the city had a meeting with residents in the Acre, Downtown, Cambodia Town, and Back Central neighborhoods to go over NRSA information			
3	Public Hearing	Minorities  Persons with disabilities  Non-targeted/broad community  Residents of Public and Assisted Housing	January 21. 2024 the city held a public hearing for organizations to present their CDBG proposals			

**Table 4 – Citizen Participation Outreach**



# Needs Assessment

## NA-05 Overview

### Needs Assessment Overview

The Consolidated Plan Needs Assessment is milieu of needs for housing, homeless and non-homeless special needs, as well as non-housing community development assistance throughout the City of Lowell. Data and tables provided throughout this section are in most cases pre-populated by HUD as a data output from the HUD Integrated Disbursement and Information System (IDIS). The data consists of 2020 Census, the American Community Survey data, Comprehensive Housing Affordability Strategy data, online survey results, and comments received during the public input session, as well as the consultation process to identify the following affordable housing, community development and homeless needs for the next five years.

## NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

### Summary of Housing Needs

The City of Lowell's primary housing needs are housing affordability. Specifically cost burden is most evident in renter occupied units among low income households. Disproportionally these households are small related to elderly households.

Demographics	Base Year: 2009	Most Recent Year: 2020	% Change
Population	109,350	111,310	2%
Households	38,490	40,260	5%
Median Income	\$48,002.00	\$62,196.00	30%

**Table 5 - Housing Needs Assessment Demographics**

**Data Source:** 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

### Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	10,580	5,630	6,760	4,990	12,300
Small Family Households	3,155	2,525	2,790	2,690	6,105
Large Family Households	545	430	745	510	1,305
Household contains at least one person 62-74 years of age	2,660	1,015	1,730	880	2,895
Household contains at least one person age 75 or older	1,375	620	440	230	500
Households with one or more children 6 years old or younger	1,470	1,250	1,385	870	1,350

**Table 6 - Total Households Table**

**Data Source:** 2016-2020 CHAS

## Housing Needs Summary Tables

### 1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Substandard Housing - Lacking complete plumbing or kitchen facilities	465	40	35	0	540	0	0	45	0	45
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	85	80	110	20	295	0	10	0	0	10
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	105	200	110	40	455	25	15	60	20	120
Housing cost burden greater than 50% of income (and none of the above problems)	4,295	750	60	0	5,105	1,245	645	265	15	2,170
Housing cost burden greater than 30% of income (and none of the above problems)	1,815	1,620	795	350	4,580	325	730	645	510	2,210

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Zero/negative Income (and none of the above problems)	550	0	0	0	550	195	0	0	0	195

**Table 7 – Housing Problems Table**

Data 2016-2020 CHAS

Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Having 1 or more of four housing problems	4,950	1,075	310	65	6,400	1,270	670	365	35	2,340
Having none of four housing problems	3,710	2,660	3,400	2,195	11,965	655	1,225	2,685	2,695	7,260
Household has negative income, but none of the other housing problems	0	0	0	0	0	0	0	0	0	0

**Table 8 – Housing Problems 2**

Data 2016-2020 CHAS

Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>								
Small Related	2,250	1,140	355	3,745	290	510	400	1,200
Large Related	395	230	90	715	110	50	70	230

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Elderly	2,055	245	100	2,400	985	555	310	1,850
Other	1,960	890	345	3,195	205	275	175	655
Total need by income	6,660	2,505	890	10,055	1,590	1,390	955	3,935

**Table 9 – Cost Burden > 30%**

Data 2016-2020 CHAS  
Source:

#### 4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>								
Small Related	0	0	230	230	215	270	0	485
Large Related	0	0	20	20	110	40	10	160
Elderly	980	60	35	1,075	760	210	75	1,045
Other	0	1,495	445	1,940	180	0	0	180
Total need by income	980	1,555	730	3,265	1,265	520	85	1,870

**Table 10 – Cost Burden > 50%**

Data 2016-2020 CHAS  
Source:

#### 5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Single family households	180	195	165	55	595	25	15	15	4	59
Multiple, unrelated family households	0	85	55	0	140	0	10	0	15	25
Other, non-family households	30	0	0	4	34	0	0	45	0	45
Total need by income	210	280	220	59	769	25	25	60	19	129

**Table 11 – Crowding Information – 1/2**

Data Source: 2016-2020 CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 12 – Crowding Information – 2/2

Data Source  
Comments:

**Describe the number and type of single person households in need of housing assistance.**

According to the 2022 5 YR acs data, there are 12,010 households living alone representing 30% of all the total housegolds. However, we expect this to be an undercount of residents living alone since unsheltered and homeless residents might not be counted in the data. This is an increase of approximately 3,000 residents living alone from the 2020 census. Single males only median income was \$50,682 and single females median income is \$36,715. Therefore, we can assume that the majority of these renters or homeowners will be cost burdened.

**Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.**

There were 1,800 individuals that sought DV services in Lowell last year with 1620 of these individuals facing housing insecurity issues. According to 5 YEAr ACS data there are approximately 16,549 individuals facing a disability. There are approximately 7400 with an ambulatory issue as well 3300 with a self care issue.

**What are the most common housing problems?**

The most common housing problem for the City of Lowell’s population is housing affordability. Of all the potential housing issues, the ones most evidently listed are Cost Burden affecting Elderly and small related households disproportionately. 5,135 of households report a cost burden of over 50% and 13,990 of households report a cost burden of over 30%. The amount of residents that are cost burdened by over 30% close to doubled since the last ConPlan.

**Are any populations/household types more affected than others by these problems?**

Of that subset of the population mentioned above; in relation to housing tenure, renters are overwhelming affected in comparison to their owner counterpart, particularly in the lower income groups. The majpority of cost burdened residents tend to be residents who earn up to 50% AMI. The

elderly, small families and households that aren't related. The most likely cause of this is that many of these residents are just beginning their careers, single parent headed households, or are retired.

**Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance**

This information may be evidenced by the characteristics and needs of individuals and families with children who are currently entering the homeless assistance system or appearing for the first time on the streets. In addition, specify particular housing characteristics that have been linked with instability and an increased risk of homelessness. Include an estimate of the number and type of formerly homeless families and individuals that are receiving rapid re-housing assistance and are nearing the termination of that assistance. Persons with the risk of entering or reentering shelters characteristically have a combination of factors which create the risk, such as lack of obtaining financial resources and social services at the same time, rent in excess of 30% of their income, and high child care, medical, family unacceptance or transportation costs. In addition to these factors additional issues may include family conflicts, domestic violence, over occupancy limits, recent crisis, housing with code or safety violations, disabilities, criminal histories, history of mental health or drug dependency, issues coordinating public subsidies or community services and prior experience with homelessness

**If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:**

The Point in time count is a count of sheltered and unsheltered homeless persons on a single night in January. HUD requires that the Continuum of Care for the area conducts an annual count of homeless persons who are sheltered in emergency shelter, transitional housing, and Safe Havens on a single night.

**Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness**

There are many variables that lead to increased risk of homelessness. Long term systemic risks include housing affordability and stagnant wage growth which is evident in the high cost burden of housing and the disproportionately effect on units that report lower area median income in Lowell. However, other variables that inevitably can lead to instability are mental illness, substance abuse, unstable job history, prior evictions, criminal background, poor money managing, and domestic violence. Receiving an eviction notice is a primary reason a household seeks prevention services..

## **Discussion**

Housing affordability and lackluster wage growth is clearly an impediment to decent, safe, and sanitary that provides a stable living environment. The primary variable is attaining this median household income is which is associated with the fewest instances of housing problems

## NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

For this section, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least 10 percentage points higher than the percentage of persons in category as a whole. For example, if 50 percent of all low-income households within in a City have a housing problem and 60 percent of low-income Asian households report having a housing problem, then a disproportionately greater need exists at that income level for the Asian population in said City. Additionally, the housing problems defined by HUD in this section include:

- Substandard housing lacking complete plumbing
- Substandard housing lacking kitchen facilities
- Overcrowded households with 1.01 to 1.5 people per room
- Households with housing cost burden greater than 30 percent of income

### 0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	9,145	1,805	865
White	4,255	845	365
Black / African American	625	95	30
Asian	1,290	130	130
American Indian, Alaska Native	75	35	0
Pacific Islander	0	0	0
Hispanic	2,825	615	290

**Table 13 - Disproportionally Greater Need 0 - 30% AMI**

Data Source: 2016-2020 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

### 30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,105	1,635	0
White	2,320	825	0
Black / African American	405	70	0
Asian	735	220	0
American Indian, Alaska Native	4	0	0
Pacific Islander	0	0	0
Hispanic	580	515	0

**Table 14 - Disproportionally Greater Need 30 - 50% AMI**

Data Source: 2016-2020 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

### 50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,155	3,395	0
White	1,045	2,055	0
Black / African American	195	260	0
Asian	530	495	0
American Indian, Alaska Native	20	0	0
Pacific Islander	0	0	0
Hispanic	330	570	0

**Table 15 - Disproportionally Greater Need 50 - 80% AMI**

Data Source: 2016-2020 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

## 80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	870	2,770	0
White	515	1,760	0
Black / African American	150	200	0
Asian	105	405	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	89	355	0

**Table 16 - Disproportionally Greater Need 80 - 100% AMI**

Data Source: 2016-2020 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

### Discussion

While most of the ethnic groups faced a similar housing need as the jurisdiction as a whole, there are some ethnicities that saw a disproportionate higher rate. The following groups had a higher rate at different income groups- African Americans had a disproportionate need at the majority of the income levels. The only income level that they are not disproportionately higher is at the 50-80% income level. At 30-50% AMI American Indian and Black/African Americans faced a disproportionate higher percentage. At 60-80% AMI American Indians and Asians faced a higher rate. Finally at 80-100% African Americans faces a higher rate.

## NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

As in the last section, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least 10 percentage points higher than the percentage of persons in category as a whole. Additionally, the housing problems defined by HUD in this section include:

- Lacks complete kitchen facilities
- Lacks complete plumbing facilities
- More than 1.5 persons per room
- Cost burden over 50%

### 0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	6,920	4,035	865
White	3,325	1,775	365
Black / African American	525	195	30
Asian	1,025	395	130
American Indian, Alaska Native	60	50	0
Pacific Islander	0	0	0
Hispanic	1,910	1,525	290

**Table 17 – Severe Housing Problems 0 - 30% AMI**

Data Source: 2016-2020 CHAS

\*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

### 30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,460	4,280	0
White	760	2,380	0
Black / African American	205	270	0
Asian	250	705	0
American Indian, Alaska Native	0	4	0
Pacific Islander	0	0	0
Hispanic	230	865	0

**Table 18 – Severe Housing Problems 30 - 50% AMI**

Data Source: 2016-2020 CHAS

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

### 50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	395	5,160	0
White	155	2,945	0
Black / African American	65	390	0
Asian	125	895	0
American Indian, Alaska Native	0	20	0
Pacific Islander	0	0	0
Hispanic	40	860	0

**Table 19 – Severe Housing Problems 50 - 80% AMI**

Data Source: 2016-2020 CHAS

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

**80%-100% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	355	3,280	0
White	175	2,105	0
Black / African American	90	265	0
Asian	60	445	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	34	410	0

**Table 20 – Severe Housing Problems 80 - 100% AMI**

Data Source: 2016-2020 CHAS

\*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

**Discussion**

African Americans was the only group that saw a disproportionate higher rate of severe housing problems at every income level except 50-80% AMI.

## NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction:

As in the last section, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least 10 percentage points higher than the percentage of persons in category as a whole. Additionally, in this section HUD defines Housing Cost Burden as Housing Cost to Income Ratio.

- No Cost Burden – Housing Cost to Income Ratio is less than 30%
- Cost Burden – Housing Cost to Income Ratio is from 30.1% to 50%
- Severe Cost Burden – Housing Cost to Income Ratio is greater than 50.1%.

### Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	21,765	7,955	8,345	905
White	13,580	4,220	4,105	365
Black / African American	1,275	510	820	30
Asian	3,350	1,360	1,175	165
American Indian, Alaska Native	130	39	0	0
Pacific Islander	0	0	0	0
Hispanic	3,095	1,695	2,170	290

**Table 21 – Greater Need: Housing Cost Burdens AMI**

Data Source: 2016-2020 CHAS

### Discussion:

None of the ethnic groups faced a disproportionate cost burdened need. If anything, African Americans, American Indians and Hispanics were less cost burdened than any other ethnic group.

## **NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)**

### **Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?**

Income categories in which racial or ethnic groups have a disproportionately greater need than the needs of that income category as a whole are very evident in the Black/ African American community. Additionally, in no circumstances did white households experience disproportional need any categories, although it is important to note that the White ethnic group make up an overwhelming percentage of the total population and therefore represent most of the average jurisdiction as a whole when percentages are calculated. This data is useful in determining if any particular racial or ethnic group has a need which is disproportionately greater than all the households in a particular income group. As noted earlier, a disproportionately greater need exists when the members of a racial or ethnic group at an income level experience housing problems at a greater rate (10% or more) than the income level as a whole of the population

### **If they have needs not identified above, what are those needs?**

All relevant needs have been identified through the CHAS data, U.S. Census data, and ACS surveys

### **Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?**

A greater percentage of African Americans reside in Centralville as well as one census tract in Downtown Lowell. Also, African Americans are mostly located in the low mod census tracts. Asians are scattered across most census tracts in Lowell. However higher numbers are located in the Lower Highlands and parts of the Acre. Hispanic are located in the census tracts that primarily make up the Acre, and Downtown neighborhoods. There is a sizable percentage of Hispanic descent residents living in Centralville, South Lowell, and Lower Highlands. These ethnic groups also correspond with lower household income and a higher likelihood of experiencing a cost burden and one or more housing problems.

## NA-35 Public Housing – 91.205(b)

### Introduction

Low-moderate income residents in Lowell utilize the local housing authorities for access to affordable housing and related services. The purpose of the Lowell Housing Authority (LHA) is to ensure safe, decent, affordable housing and to create opportunities for resident’s self-sufficiency and economic independence. The Lowell Housing Authority team, working in partnership with other housing providers, local Government and our residents will strive to provide the highest level of housing and a variety of Social Service programs that will assist residents and employees in achieving their highest level of self-sufficiency. The LHA maintains and coordinates Section 8 as well as public housing. The need for additional affordable housing units is crucial for Lowell residents, but the lack of developable land and contractors willing to develop affordable housing is a barrier

### Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	1,638	1,161	119	922	0	0	104

**Table 22 - Public Housing by Program Type**

**\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Data Source: PIC (PIH Information Center)

### LHA Dara

## Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	15,636	15,888	16,801	15,679	0	0
Average length of stay	0	0	8	7	2	7	0	0
Average Household size	0	0	1	2	3	2	0	0
# Homeless at admission	0	0	1	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	653	202	7	184	0	0
# of Disabled Families	0	0	679	480	41	345	0	0
# of Families requesting accessibility features	0	0	1,638	1,161	119	922	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

**Table 23 – Characteristics of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

**updated data**

**more data**

## Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	1,302	989	97	794	0	0	86
Black/African American	0	0	76	52	4	43	0	0	3
Asian	0	0	253	119	18	84	0	0	15
American Indian/Alaska Native	0	0	4	1	0	1	0	0	0
Pacific Islander	0	0	3	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

**Table 24 – Race of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	1,158	1,249	189	919	4	0	0
Black/African American	0	0	92	114	14	80	0	0	0
Asian	0	0	279	144	29	98	0	0	0
American Indian/Alaska Native	0	0	3	1	0	0	0	0	0
Pacific Islander	0	0	4	3	1	2	0	0	0
Other	0	0	0	0	0	0	0	0	0

Iha race

**Ethnicity of Residents**

Ethnicity	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	602	505	62	399	0	0	38
Not Hispanic	0	0	1,036	656	57	523	0	0	66
<b>*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition</b>									

**Table 25 – Ethnicity of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

**LHA ethnicity**

**Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:**

The LHA plan to increase 5 to 10 additional handicap accessible units for elderly and disabled developments within the next 5 years.

**Most immediate needs of residents of Public Housing and Housing Choice voucher holders**

The demand for rental units has sharply increased in the city of Lowell resulting in a low vacancy rate. Many rental properties throughout greater Lowell are forced to form waiting lists for those seeking apartments. The market rent in city of Lowell has also increased drastically. The current Lowell area market rent is higher than fair market rents established by HUD. This limits the availability of units and unfortunately has resulted in only two applicants having been housed.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

**How do these needs compare to the housing needs of the population at large**

The needs of the LHA for housing are comparable to the needs of the low to moderate income households for the population as a whole.

The wait list for Section 8 and the Housing Authority units is 9,025 individuals and families, many who are disabled. Undoubtedly, those on the wait list are currently comprised of a large portion of those residents of Lowell who are cost burdened.

**Discussion**

The housing crisis and the stagnant wages have forced many low and moderate residents to seek public housing units. While LHA is the 4th largest PHA in the area, they do not have the enough resources to meet the regional and local affordable housing unit demand. While they have listed all of the units that can be rented LHA still has a backlog of 15 million worth of repairs that their operating budget cannot cover due to limited federal and stand funds. Therefore, these units go unfilled for a period of time. LHA is looking at developing property within the NRSA and other parts of the city on their land to help fill some of the backlog of units needed to meet demand.

## **NA-40 Homeless Needs Assessment – 91.205(c)**

### **Introduction:**

Since the pandemic the homeless has become worse in Lowell. While the city has invested heavily in prior years to homeless services, the city is reexamining how the ESG funds will be allocated.

**NEED TO UPDATE NARRATIVE WITH 2024 PIT. HOMELESS NEEDS ASSESSMENT TABLE ALREADY UPATED W 2024 PIT DATA.**

**The following is a summary of the Homeless Needs Assessment data that is available. Total SHELTERED count of PERSONS in Households with Adult and Children plus Children Only Households, and Only Adult Household in 2023 was 847 homeless households. This number included 13 unaccompanied youth who were between the ages of 18-24. They were not listed as households with only children in the table below as they were over 17 years old.**

**The total number of SHELTERED HOUSEHOLDS was 406.**

**The total UNSHELTERED count of homeless persons (persons in Households with Adult and Children plus Children Only Households, and Only Adult Household in 2023) was 73.**

**The total UNSHLETERED count of homeless HOUSEHOLDS was the same, at 73 in that PIT count in the same year 2023.**

**Total unsheltered homeless persons, number of persons served, PIT was 73 (adults no children). PIT unsheltered homeless households were same number, 73. There were 3 unaccompanied youth who were unsheltered counted that year.**

**Total sheltered plus unsheltered: 920 Persons in 2023.**

**Total sheltered plus unsheltered: 479 households in 2023.**

**Homeless Needs Assessment**

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	0	789	600	0	0	0
Persons in Households with Only Children	0	0	0	0	0	0
Persons in Households with Only Adults	241	189	211	0	0	0
Chronically Homeless Individuals	55	45	45	0	0	0
Chronically Homeless Families	40	24	24	0	0	0
Veterans	10	8	8	0	0	0
Unaccompanied Child	0	13	12	0	0	0
Persons with HIV	3	0	4	0	0	0

**Table 26 - Homeless Needs Assessment**

**Data Source Comments:** Data in table are from 2024 Point In Time Count for numbers on a given night. Estimates in the number experiencing and becoming homeless are from preliminary data from 2025 Point In Time Count and recent CAPER HMIS reports data.

Indicate if the homeless population is: Has No Rural Homeless

**If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):**

Description of number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," and these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

**Nature and Extent of Homelessness: (Optional)**

<b>Race:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
White	200	23
Black or African American	357	0
Asian	18	3
American Indian or Alaska Native	1	0
Pacific Islander	5	0
<b>Ethnicity:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
Hispanic	94	6
Not Hispanic	594	35

Above data is latest available for PIT 2024. The numbers above do not include bi or multi racial persons. PIT 2023: A significant number of sheltered and unsheltered persons identify as multiracial, 333 sheltered, and 16 unsheltered. Also in PIT 2023, for sheltered homeless 22 identified as Hispanic their race while, 342 identified their ethnicity as Hispanic. For the unsheltered count, 1 identified their race as Hispanic and 15 identified having a Hispanic ethnicity.

**Data Source**  
**Comments:**

**Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.**

In there were approximately persons that experienced homelessness. Approximately % were persons in families and no families were unsheltered.

**Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.**

Please see the data in the table above. Also, a significant number of persons who were homeless were identified as multi racial, 349 out of 920 of the total homeless count 2023.

**Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.**

Lowell is designated as a high-cost area with low vacancy rates. Access to housing is limited. In addition, landlords have begun to refuse to take housing vouchers as many have experienced extreme cases of property damage not covered by rental security deposits. Even with many of the housing supports, when available, many homeless persons do not have sufficient income to meet and/or sustain housing costs.

**Discussion:**

Due to the difficulty of finding housing for housing insecure families, the city is prioritizing ESG and CDBG funds on essential services and homeless prevention.

## **NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)**

### **Introduction:**

This section describes to the extent practicable the housing needs of persons who are not homeless but require supportive housing. Lowell was a jurisdiction which has received funding on behalf of eligible metropolitan statistical area under the HOPWA program, which supports needs for housing and supportive services of low- and moderate-income persons with HIV/AIDS and their families throughout the eligible metropolitan statistical area of Middlesex and Essex counties. For now, and the foreseeable future Cambridge will now handle HOPWA for Middlesex and Essex Counties.

### **Describe the characteristics of special needs populations in your community:**

There are currently six different groups characterized as non-homeless special needs populations in the Greater Lowell community: Elderly/ Frail Elderly Persons with Severe Mental Illness Persons with Disabilities (Developmental and/or Physical) Individuals with Alcohol/Other Drug Addiction Individuals with HIV/Aids Based on the 2018-2023 American Community Survey, there are a total of 113,838 individuals living in the in the City of Lowell of which 15% are living with a disability ; whether it be a hearing, vision, cognitive, ambulatory, self-care, and/or independent living difficulty. Presently, data is unavailable that compartmentalizes the specific number of individuals living with the disabilities listed (I.E. The number of individuals over the age of 65 years old affected by independent living difficult).

### **What are the housing and supportive service needs of these populations and how are these needs determined?**

There are over 2500 affordable housing facilities in Lowell for elderly citizens. The Lowell Housing Authority maintains more than 500 units in public-housing projects for non-elderly special needs populations including persons with mental illness, persons with disabilities, those dealing with alcohol/drug addiction, persons living with HIV/Aids, veterans, and those with uncategorized special needs. Approximately 23 group home units are maintained by the Massachusetts Department of Mental Health as well as an additional 25 private group home facilities for special needs populations. The priorities for individual Non-Homeless Special Needs categories identified in this plan are derived from the input obtained from numerous outreach efforts, surveys, and consultations used to identify community needs and establish this Consolidated Plan's priorities. Prioritization also takes into consideration feasibility of projects, impact of the costs of larger projects on other priorities, the anticipated funding levels for the Consolidated Plan programs, and other sources of funding that may be available to address established needs

**Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:**

From 2000 to 2014, the number of annual diagnoses of human immunodeficiency virus (HIV) infection in Massachusetts declined 47% (1). In August 2016, however, the Massachusetts Department of Public Health (MDPH) received reports of five new HIV cases among persons who inject drugs from a single community health center in the City of Lawrence (2). On average, less than one case per month among persons who inject drugs had been reported in Lawrence during 2014–2015 from all providers. Surveillance identified additional cases of HIV infection among such persons linked to Lawrence and Lowell, in northeastern Massachusetts, during 2016–2017. In 2018, MDPH and CDC conducted an investigation to characterize the outbreak and recommend control measures. Investigators reviewed surveillance data and HIV-1 polymerase (pol) gene nucleotide sequences derived from drug resistance testing and interviewed persons with HIV infection in northeastern Massachusetts. Cases were defined as diagnoses of HIV infection in northeastern Massachusetts during January 2015– May 2018 in 1) a person who injects drugs who received medical care, experienced homelessness, resided, or injected drugs in Lawrence or Lowell; 2) a person who was epidemiologically linked as an injecting or sex partner of a person with HIV infection connected to Lawrence or Lowell; or 3) a person with an HIV-1 pol nucleotide sequence molecularly linked at a genetic distance of  $\leq 1.5\%$  (as determined by pairwise sequence analysis) to that of another person in the investigation who was connected to Lawrence or Lowell. Qualitative interviews were conducted with a purposeful sample of 34 persons who inject drugs to assess risk factors for HIV infection and with 19 clinicians and other stakeholders in Lawrence and Lowell to identify available medical and social services. As of June 30, 2018, a total of 129 persons meeting the case definition were identified; 74 (57%) were male, 94 (73%) were aged 20–39 years at diagnosis, 87 (67%) were non-Hispanic white, and 38 (29%) were Hispanic. Most (114; 88%) reported a history of injection drug use (Figure), including four (3%) who also reported male-to-male sexual contact; 116 (90%) had laboratory evidence of past or current hepatitis C virus infection. Median CD4+ cell count at diagnosis was 550 cells/ $\mu\text{L}$  (range = 1–1,470), suggestive of a number of recent infections (3). Molecular analysis aided case identification: 28 (22%) cases had epidemiologic links only; 69 (53%) had both epidemiologic and molecular links; and 32 (25%) had molecular links only. Four clusters of  $\geq 5$  cases were identified using molecular links; two of these clusters accounted for 78 (60%) cases

**If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))**

The city will not be having a TBRA program.

**Discussion:**

The information produced should be used to further inform entities of the current needs of those who may be impacted by or considered disabled, alcohol/drug addicts, elderly/frail elderly, mentally ill, and/or HIV/Aids patient

## **NA-50 Non-Housing Community Development Needs – 91.215 (f)**

### **Describe the jurisdiction’s need for Public Facilities:**

Consistent with Lowell’s Master Plan, the city will continue to work towards addressing non-housing community development “public facilities” needs through the support of the city’s physical infrastructure. In order to continue to improve the overall quality of life within neighborhoods, facilities and organizations catering to underserved populations will continue to be a priority. Senior centers, homeless facilities, youth centers, neighborhood facilities, parks and recreational spaces as well as health facilities.

### **How were these needs determined?**

Community Development referred to the master plan to align its activities with this con plan. The Master Plan had at least 3 workshops, at least 30 focus groups, and community surveys to be developed. For the ConPlan the city had 4 focus groups to determine the following needs: homeless population, special populations, ethnic community groups, and social providers. The city also conducted a community needs survey in the summer. The needs highlighted in this survey were used to assist us in the development of the NRSA as well as the over Conplan. The city had a public meeting in December to talk to neighborhood groups and community residents residing in the NRSA.

### **Describe the jurisdiction’s need for Public Improvements:**

Lowell plans to improve public entities that directly impact community and neighborhood citizen well-being. The two main goals Parks, Open Spaces, and Trails of Lowell Forward is to:

1. Strengthen Social Resilience, Equity, Access, and Maintenance to, and of, Parks, Open Spaces, and Trails.
2. Strengthen Climate Resilience and Sustainability in Parks, Open Spaces, and Trail

### **How were these needs determined?**

The priorities for individual Non-Homeless Special Needs categories identified in this plan are derived from the input obtained from numerous outreach efforts including surveys and consultations used to identify community needs and establish this Consolidated Plan’s priorities. Consolidated Plan public hearings also were conducted. Citizens who participated at the hearing emphasized the necessity for better bike infrastructure, Development Services, more Planning and Community Development input as well as Parks and Recreation. CDBG non PS apps were also reviewed by an internal committee to allocate funding to appropriate sources based on need, eligibility and impact.

**Describe the jurisdiction’s need for Public Services:**

To ensure that Lowell can be a “Lifetime City,” particularly for those for whom the affordability of housing is a primary impediment. CDBG and other funds, in addition to supporting the production, rehabilitation, and de-leading of housing as well as public services aimed at food insecurity, lowering the cost of living for all Lowellians, and providing services to special populations.

**How were these needs determined?**

CDBG funds for public services are subject to a 15% Cap and have goals consistent with the needs identified in the Consolidated Plan. The needs addressed prior were shown through the community needs results as well as the Community Needs Assessment done by Community Teamwork and the Greater Lowell Health Alliance.

# Housing Market Analysis

## MA-05 Overview

### Housing Market Analysis Overview:

The purpose of the Market Analysis is to provide a clear picture of the environment in which the City of Lowell will administer our programs over the course of the Consolidated Plan. In conjunction with the Needs Assessment, the Market Analysis will provide the basis for the Strategic Plan and the programs and projects to be administered. Most of the data tables in this section will be pre-populated with default data such as CHAPA and other Census products based on the most recent data available. Lowell's housing prices are growing increasingly out of reach for those who call the city home, and these growing costs endanger Lowell's status as a city of opportunity. A constrained market is driving these high housing costs, which is partially an effect of Lowell's housing policies, including restrictive zoning. In addition, high construction and land costs create a gap between the cost of building a unit and the expected return, which demands consideration of new or expanded market-rate subsidy programs and the cost impacts of current policy. Finally, recent interest rate trends have drastically reduced turnover, further distorting the housing market.

## MA-10 Number of Housing Units – 91.210(a)&(b)(2)

### Introduction

As required by federal regulations found in 24 CFR 91.210 - The Housing Market Analysis must describe the significant characteristics of the jurisdiction’s housing market, including the supply, demand, and condition and cost of housing and the housing stock available to serve persons with disabilities, and to serve other low-income persons with special needs, including persons with HIV/AIDS and their families. The purpose of the Market Analysis is to provide a clear picture of the environment in which the City of Lowell must administer its programs over the course of the Consolidated Plan. This section of the Plan is based on HUD regulations and covers topics including general characteristics of the housing market, lead-based paint hazards, public and assisted housing, facilities and services for homeless persons, special needs facilities and services, and barriers to affordable housing. In conjunction with the Needs Assessment section of this Plan and other public input received, the Market Analysis will provide the basis for the Strategic Plan and the programs and projects to be administered. Most of the data tables in this section are populated with a default data set based on the most recent data available from HUD. Additional data has been obtained from various sources, including more current American Community Survey estimate

### All residential properties by number of units

Property Type	Number	%
1-unit detached structure	13,440	32%
1-unit, attached structure	2,240	5%
2-4 units	12,300	29%
5-19 units	6,910	16%
20 or more units	7,015	17%
Mobile Home, boat, RV, van, etc	115	0%
<b>Total</b>	<b>42,020</b>	<b>100%</b>

**Table 27 – Residential Properties by Unit Number**

Data Source: 2016-2020 ACS

### Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	145	1%	1,395	6%
1 bedroom	770	4%	5,285	23%
2 bedrooms	4,100	23%	10,285	45%
3 or more bedrooms	12,440	71%	5,840	26%
<b>Total</b>	<b>17,455</b>	<b>99%</b>	<b>22,805</b>	<b>100%</b>

**Table 28 – Unit Size by Tenure**

Data Source: 2016-2020 ACS

**Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.**

The residents that receive assistance with housing are in the low to moderate income level. HOME funds will also be used for the First Time Homebuyer program which generally assists first time homebuyers whose income level is 80 percent of the AMI or less. Rental units funded under HOME will be for units for households that earn up to 60% of the AMI. CDBG funds will be used for a rehabilitation program which generally assists families with home rehabilitation improvements whose income is at 80 percent of the AMI or less. Most of the homes rehabbed will be single family with some multi-unit buildings done. The city also sets aside some Community Preservation Act Funds for affordable housing projects. CPA funds may be spent on the acquisition, creation, preservation, or support of community housing, and for the rehabilitation of community housing acquired or created with CPA funds. The CPA requires that whenever possible; preference be given to projects which aim to reuse existing buildings or construct new units on previously developed land. Support for community housing includes programs that provide grants, loans, rental assistance, security deposits, interest-rate write downs, or other forms of assistance directly to individuals or families who are eligible for community housing, or to an entity that owns, operates, or manages such housing, for the purpose of making housing affordable. The U.S. Department of Housing and Urban Development (HUD) income guidelines are used to determine who is eligible to live in affordable housing units developed using CPA funds. Housing developed utilizing CPA funds must be offered to people, and families whose annual income is less than 100% of the area wide median income. Communities may choose to limit certain housing units created with CPA funds to people and families earning less than 80% of the area wide median income.

**Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.**

During this conplan, there could potentially be 331 expiring use units lost. The majority of the units of the units are rental units. Half of the properties included in this list are for senior and disabled units.

**Does the availability of housing units meet the needs of the population?**

There is a gap between number of affordable housing units and the number of households who need affordable housing. While the City of Lowell has a higher than the regional average of the overall amount and percentage of subsidized housing stock; given the statistics in this report of the cost burden figures the waiting list for Public housing and Section 8 vouchers, it is clear there is a need for more affordable housing, given the populations demographics of the City.

2,502 additional units by 2030 to keep up with demand and a desirable vacancy rate 3,203 additional units by 2040 to keep up with demand and a desirable vacancy rate

**Describe the need for specific types of housing:**

The analysis indicates there is a large undersupply of owner units that could be sold at \$200,000 or less. Most units in Lowell are valued at \$200,000 and above and would probably sell for more than that amount. For many households that currently own, a mortgage for a home priced at \$200,000 or more would cost more than 30% of their income. These households may have purchased their house when it was less expensive, locking in a low mortgage. It is also possible that they acquired their house at less than its market value through family or purchased their house when their income was higher, for example, before they retired. If those households wish to relocate now, there may be no options that are as affordable to them as the house they already own,

A similar analysis of rental units indicates that there is not only an undersupply of the most affordable units—\$600 a month and below— but also there is an undersupply at the highest cost ranges, \$2,000 and up. This suggests that there could be an untapped market for higher end market rate rental units or for ownership units at that price level. If available, some of those who could afford these newer units might relocate, which would free up more naturally affordable units for lower incomes. Importantly, this might not actually play out in practice for every higher-income renter—some may choose a more modest rental home even if they could afford more for many reasons. A thorough market study would be appropriate to determine how many upper-end rental or starter ownership units Lowell could absorb and if this would have an effect of freeing up more affordable units. Regardless, Lowell’s largest housing need is at the most affordable level, with a nearly 3,000 There is an undersupply of rental units under \$600 a month gross rent, but also a possible undersupply of rental units over \$2,000 a month. Are there really homes for sale under \$150,000 and for rent under \$600? The American Community Survey asks homeowner (single family and condo) residents the following question: “About how much do you think this house and lot, apartment, or mobile home[...] would sell for if it were for sale?” This gives an estimate of the value of every home, not just those that were recently sold. Homes that were valued at small amounts could reflect small condos, dilapidated units, and/or underestimates by owners. Median single family home sales price (\$445,000) gives a more accurate snapshot of the costs a typical household would face buying a new home but does not show a distribution. Taking these two data sets together can give a fuller picture of the housing situation. Similarly, the American Community Survey asks respondents the costs of their rent and utilities and combines these into a “gross rent” number. Households that report very low rents may live in subsidized housing, they may pay below-market rents to friends or family, or they may live in other unique situations that result in rents below the market rate. The estimate of median rent (roughly \$1,500) is a more accurate snapshot of the costs of a typical renter household, but like the median home sales price, it does not show a distribution. NMCOG grouped units into cost categories and matched these cost categories to income groups which could afford them using an affordability threshold of 30% of income. The number of households in each income category was subtracted from the number of units affordable to them to result in the numbers in the tables in this section. unit mismatch between those who can afford \$300 monthly or less and units available at that level. Units at this rent would need to be deeply subsidized and likely income restricted.

## **Discussion**

Housing affordability is a huge concern for low- and moderate-income household. The city is taking a two-tiered approach to address housing costs: housing production and economic/ workforce development.

## MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

### Introduction

This section of the Consolidated Plan examines the Cost of Housing in the City of Lowell. Specific areas of consideration are the availability of housing at all income levels, the affordability of housing, and how existing market rental rates compare to the Fair Market Rent and HOME Investment Partnership's Program rent limits

### Cost of Housing

	Base Year: 2009	Most Recent Year: 2020	% Change
Median Home Value	232,200	285,200	23%
Median Contract Rent	901	1,076	19%

Table 29 – Cost of Housing

Data Source: 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	3,935	17.3%
\$500-999	6,255	27.4%
\$1,000-1,499	9,040	39.7%
\$1,500-1,999	2,705	11.9%
\$2,000 or more	870	3.8%
<b>Total</b>	<b>22,805</b>	<b>100.0%</b>

Table 30 - Rent Paid

Data Source: 2016-2020 ACS

### Housing Affordability

Number of Units affordable to Households earning	Renter	Owner
30% HAMFI	4,005	No Data
50% HAMFI	8,560	1,370
80% HAMFI	15,785	4,305
100% HAMFI	No Data	8,150
<b>Total</b>	<b>28,350</b>	<b>13,825</b>

Table 31 – Housing Affordability

Data Source: 2016-2020 CHAS

## Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	1,340	1,490	1,955	2,379	2,626
High HOME Rent	1,026	1,179	1,514	1,785	1,971
Low HOME Rent	942	1,009	1,211	1,399	1,561

**Table 32 – Monthly Rent**

Data Source: HUD FMR and HOME Rents

**TABLE 8: PROJECTED HOUSEHOLDS AND UNITS, LOWELL, 2030-2050**

Projected Year	2030	2040	2050
Number of households projected, proportional size decreases	43,587	44,247	43,980
Number of target units, proportional size in region decreases	46,298	46,999	46,715
New units required, proportional size in region decreases	2,502	701	-284
Number of households projected, maintain proportional size	44,794	46,013	45,729
Number of target units, maintain proportional size in region	47,580	48,876	48,573
New units required, maintain proportional size in region	3,784	1,296	-302

Source: MAPC, Massachusetts Regional Household and Labor Force Projections and Subregional Allocation, 2023 and NMCOG analysis.

### projected housinlds and units

**TABLE 10: COST MISMATCH FOR RENTAL UNITS, 2017-21**

Monthly Rent	Estimated Demand	Estimated Supply	Mismatch
Less than \$300 or no cash rent	4,558	1,591	-2,967
\$300 to \$599	2,921	2,255	-666
\$600 to \$899	2,126	2,595	469
\$900 to \$1,249	2,953	4,621	1,668
\$1,250 to \$1,499	4,194	4,505	311
\$1,500 to \$1,999	3,004	6,185	3,181
\$2,000 to \$2,999	3,060	2,101	-959
\$3,000 or more	1,181	144	-1,037
<b>Total</b>	<b>23,997</b>	<b>23,997</b>	<b>3,164</b>

Source: NMCOG Analysis (see sidebar). For full rent distribution, refer to page 37.

### mismatch

## Is there sufficient housing for households at all income levels?

At least 2,502 units are needed based on growth projections, particularly units affordable to lower incomes or filling an untapped mid-income market. A similar analysis of rental units indicates that there are not only an undersupply of the most affordable units—\$600 a month and below— but also there is an undersupply at the highest cost ranges, \$2,000 and up. This suggests that there could be an untapped market for higher end market rate rental units or for ownership units at that price level. If available, some of those who could afford these newer units might relocate, which would free up more naturally affordable units for lower incomes. Importantly, this might not actually play out in practice for every higher-income renter—some may choose a more modest rental home even if they could afford more for many reasons. A thorough market study would be appropriate to determine how many upper-end rental or starter ownership units Lowell could absorb and if this would have an effect of freeing up more affordable units. Regardless, Lowell’s largest housing need is at the most affordable level, with a nearly 3,000 There is an undersupply of rental units under \$600 a month gross rent, but also a possible undersupply of rental units over \$2,000 a month. Are there really homes for sale under \$150,000 and for rent under \$600? The American Community Survey asks homeowner (single family and condo) residents the following question: “About how much do you think this house and lot, apartment, or mobile home[...] would sell for if it were for sale?” This gives an estimate of the value of every home, not just those that were recently sold. Homes that were valued at small amounts could reflect small condos, dilapidated units, and/or underestimates by owners. Median single family home sales price (\$445,000) gives a more accurate snapshot of the costs a typical household would face buying a new home, but does not show a distribution. Taking these two data sets together can give a fuller picture of the housing situation. Similarly, the American Community Survey asks respondents the costs of their rent and utilities and combines these into a “gross rent” number. Households that report very low rents may live in subsidized housing, they may pay below-market rents to friends or family, or they may live in other unique situations that result in rents below the market rate. The estimate of median rent (roughly \$1,500) is a more accurate snapshot of the costs of a typical renter household, but like the median home sales price, it does not show a distribution. NMCOG grouped units into cost categories and matched these cost categories to income groups which could afford them using an affordability threshold of 30% of income. The number of households in each income category was subtracted from the number of units affordable to them to result in the numbers in the tables in this section. unit mismatch between those who can afford \$300 monthly or less and units available at that level. Units at this rent would need to be deeply subsidized and likely income-restricted.

### **How is affordability of housing likely to change considering changes to home values and/or rents?**

Housing affordability is going to be a major issue for the majority of residents in Lowell if housing values don't decrease. According to Harvard's Joint Center for Housing Studies a household needs to earn between \$100,000 and \$149,999 to be able to afford a median priced home in the area. Lowell's

housing prices are growing increasingly out of reach for those who call the city home, and these growing costs endanger Lowell's status as a city of opportunity. 16,825 (40%) households are Housing Cost Burdened, paying more than 30% of their income on housing, with 8,023 (20%) of those paying more than half of their income on housing. 13,775 cost-burdened households have an income of less than 80% AMI and would therefore qualify for most affordable housing. That said, Lowell's largest housing need is at the most affordable level, with a nearly 3,000-unit mismatch between those who can afford \$300 monthly or less rent and units available at that level. Units at this rent would need to be deeply subsidized.

**How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?**

FMRs are higher than the HOME rents. However, with residents not being able to find units lower priced in the local market the city will need to continue to produce more income restricted units via HOME or other means since we expect very little turnover on these units.

**Discussion**

Affordability is a major issue for the region. Due to government policies the city needs to look at developing housing outside the inner city since many housing units in the wealthier sections of town are often higher than the current FMR.

## MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

### Introduction

The most significant characteristics of the age of existing housing supply that exhibits the greatest cause for concern in Lowell’s housing stock, is the risk posed by lead-based paint. These homes are more likely to need repairs to provide safe, decent and affordable housing. Conditions of units may be associated with the lack of complete kitchen or plumbing facilities, more than one person per room, lead paint hazards, or having a cost burden greater than 30%. Disproportionally, the low to moderate income families who rent are more affected by this.

### Describe the jurisdiction's definition of "standard condition" and "substandard condition but suitable for rehabilitation":

The City of Lowell’s Policy and Procedures for the Housing Rehabilitation program sets a minimum standard for rehabilitation. The City of Lowell Minimum Housing Rehabilitation Standards are designed to include and to expand on the requirements of the HUD Section 8 Housing Quality Standards. Many of the requirements and standards of this document exceed the requirements of the HUD Section 8 Housing Quality Standards and/or the Minimum Property Standards, and are determined necessary to further define the intent or outcome of these standards and to expand on the common definitions of “safe, decent, and sanitary” housing; “non-luxury, suitable amenities” housing; and “good quality, reasonably priced” housing, that is affordable to persons that are low or low and moderate income.

### Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	0	0%	0	0%
With two selected Conditions	0	0%	0	0%
With three selected Conditions	0	0%	0	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	0	0%	0	0%
<b>Total</b>	<b>0</b>	<b>0%</b>	<b>0</b>	<b>0%</b>

Table 33 - Condition of Units

Data Source: 2016-2020 ACS

### Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	1,105	6%	1,290	6%
1980-1999	2,270	13%	3,160	14%
1950-1979	4,890	28%	6,825	30%

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Before 1950	9,200	53%	11,525	51%
<b>Total</b>	<b>17,465</b>	<b>100%</b>	<b>22,800</b>	<b>101%</b>

**Table 34 – Year Unit Built**

Data Source: 2016-2020 CHAS

### Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	14,090	81%	18,350	80%
Housing Units build before 1980 with children present	0	0%	0	0%

**Table 35 – Risk of Lead-Based Paint**

Data Source: 2016-2020 ACS (Total Units) 2016-2020 CHAS (Units with Children present)

### Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

**Table 36 - Vacant Units**

Data Source: 2005-2009 CHAS

### Need for Owner and Rental Rehabilitation

#### Estimated Number of Housing Units Occupied by Low- or Moderate-Income Families with LBP Hazards

According to the 2018-2023 American Community Survey, there are 6,546 children under five in Lowell, representing 5.7% of the total population. Based on information available from the CDC and the Massachusetts Department of Public Health/Childhood Lead Poisoning Prevention Program (DPH/CLPP), the prevalence rate of children under six, were documented with an elevated blood level greater than 5 mcg/dl was 30.1 in 2023. These statistics contribute to Lowell’s ranking among the top 20 high risk communities in the State for childhood lead poisoning. This rate has increased since the last consolidated plan.

Need is prevalent among extremely Low, Low and Moderate- Income Families. Based on the 2020 US Census, 51% of Lowell residents are low and moderate income. If the following extremely low, low, and moderate income persons are aggregated into low and moderate income families; and if it is assumed

that they occupy a percentage of the City's housing units proportional to their population (59.29%), then as many as 59.29% of all pre-1978 housing units can be reasoned to be occupied by low and moderate income families. This number may be even higher, since the low-income population is more likely to occupy older substandard housing than people with greater economic means. The City of Lowell estimates the number of housing units occupied by low- and moderate-income household that may have chipping, peeling and deteriorating lead-based paint hazards to be conservatively 20,823 households. Assuming 8.4% of the population is made up of children under 6; it can be said with a high level of validity that there are approximately 1,749 households with children under 6, which are below 80% AMI, potentially living in a home with lead paint hazards. Regardless of the precise numbers, Lowell has an aging housing stock and a substantial proportion of extremely low-, low-, and moderate-income individuals and families, living with potential lead paint hazards.

## **Discussion**

Inflation and stagnant wages have made home repairs financially infeasible for many low- and moderate-income residents. Our program will allow more residents to be able to make emergency repairs with CDBG and full repair using HOME funds.

## MA-25 Public and Assisted Housing – 91.210(b)

### Introduction

The Lowell Housing Authority was founded in 1937 as a result of the Housing Act of 1937. The agency is the first public housing authority in Massachusetts and is now the state's third largest. Since the organization's inception, the Authority has been tasked with providing "safe, decent, and sanitary housing" for low-income residents of the community. Over the years, the agency adapted seamlessly to changes in legislation which provided greater flexibility in implementing affordable housing programs and services. The Lowell Housing Authority has become not just a housing provider, but rather, a full social service agency designed to provide stability and create opportunities for residents to achieve self-sufficiency. Our talented team helps to address critical policy issues of today but also possesses the knowledge and education to proactively adapt to the industry challenges of the future.

### Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	0	1,698	1,171	115	1,056	0	0	657
# of accessible units			57						
<b>*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition</b>									

**Table 37 – Total Number of Units by Program Type**

Data Source: PIC (PIH Information Center)

**Describe the supply of public housing developments:**

**Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:**

The Lowell Housing Authority (LHA), founded in 1937, is the first public housing authority in Massachusetts, and one of the largest in the state with a Federal Public Housing Portfolio consisting of 1,611 units. Out of the 1,611 units, approximately 85% were constructed more than 65 years ago throughout our community. The LHA's primary mission is to provide safe, decent, and sanitary housing for low to moderate income residents in the City of Lowell.

Due to the rising cost of building materials, building envelope repairs, elevators requiring upgrades or total replacement, underground utility infrastructure upgrades and the critical aging infrastructure within our portfolio has proven to be a challenge for our agency.

Currently, the level of funding resources received is not sufficient to maintain the properties within our portfolio. Many of our vacant units require extensive repairs before the units can be re-occupied.

To continue to provide the quality of housing necessary to meet the needs and expectations of our residents, the LHA has devised a Sustainability Plan, of which prioritizes the unit repairs and are as follows:

1. **Substantial Renovation**

45 units were taken offline and placed under capital projects with the total cost per unit exceeding \$26,000.00.

1. **Units that will require more than 4 weeks to complete**

15 units require major repairs, of which will take more than 4 weeks to complete.

1. **Units with normal wear and tear**

25 units requiring less than 3 weeks to complete.

## Public Housing Condition

Public Housing Development	Average Inspection Score
AMP1: North Common Village	86
AMP 2: Highland Parkway, Harold Hartwell, Colwell Ave	80
AMP 3: South Common Village, Faulkner St Project	94
mp4: City View Tower, Belvidere Heights. Francis Gate House, Centralville Gardens	83

Table 38 - Public Housing Condition

**Describe the restoration and revitalization needs of public housing units in the jurisdiction:**

**Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:**

1. LHA is establishing a Resident Service Division that provides additional services for our residents in public housing as well as Section 8 program participants.
1. Create and set-aside Housing Choice Vouchers for Public Housing residents graduating out of the Family Self-Sufficiency (FSS) Program and ready for homeownership.
1. Collaborate with area non-profits organizations to identify additional services suitable for our resident/program participants.

LHA to expand resident communications with ADA compliant web site, designed to improve resident accountability and improved lease enforcement

### Discussion:

LHA is making strides to improve their units despite their limited funding.

## MA-30 Homeless Facilities and Services – 91.210(c)

### Introduction

Below is a brief inventory of facilities, housing, and services that meet the needs of homeless persons within the jurisdiction, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. Provided by Lowell’s new Homelessness Initiative Director, Maura Fitpatrick

### Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	292	0	94	65	0
Households with Only Adults	90	60	0	44	0
Chronically Homeless Households	0	0	0	0	0
Veterans	2	0	37	0	0
Unaccompanied Youth	0	0	0	0	0

**Table 39 - Facilities and Housing Targeted to Homeless Households**

Data Source Comments:

**Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons**

The homeless has an inundated number of services available to them dealing with issues such as health, mental health and employment services:

**List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.**

Below is a brief inventory of facilities, housing, and services that meet the needs of homeless persons within the jurisdiction, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. Provided by Lowell's Continuum of Care, this information represents the most recent Housing Inventory.

**Emergency Shelter:**

Lowell Transitional Living Center (Lowell Transitional Living Center)

Community Teamwork, Inc. (Milly's Place and Scattered-Site)

**Transitional Housing:**

Alternative House

Community Teamwork, Inc. (SSTAP)

House of Hope, Inc. (House of Hope, Inc., H2O)

Lowell Housing Authority (Traditional Housing)

U.S. Department of Veteran's Affairs (Crescent House)

## **Permanent Supportive Housing**

Alternative House (Alternative House Apartments)

American Training (Choices for Living)

Bridgewell, Inc. (Pathfinder Apartments)

Eliot Community Human Services (Columbus Ave. and Scattered Sites)

House of Hope Housing Inc. (Scattered Apartments)

Institute for Health and Recovery (HEAL—Formerly Julie House)

Lowell Transitional Living Center (LTLC Apartments)

Mental Health Association of Greater Lowell (MHA Supportive Housing I, MHA Supportive Housing II)

## **MA-35 Special Needs Facilities and Services – 91.210(d)**

### **Introduction**

**Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs**

**Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing**

**Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)**

**For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))**

## **MA-40 Barriers to Affordable Housing – 91.210(e)**

### **Negative Effects of Public Policies on Affordable Housing and Residential Investment**

The only negative effects currently is the predominate use of single family zoning in a majority of residential areas. These single family zones make it difficult to build enough housing stock to adequately meet the demand.

# MA-45 Non-Housing Community Development Assets – 91.215 (f)

## Introduction

### Economic Development Market Analysis

#### Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	0	0	0	0	0
Arts, Entertainment, Accommodations	0	0	0	0	0
Construction	0	0	0	0	0
Education and Health Care Services	0	0	0	0	0
Finance, Insurance, and Real Estate	0	0	0	0	0
Information	0	0	0	0	0
Manufacturing	0	0	0	0	0
Other Services	0	0	0	0	0
Professional, Scientific, Management Services	0	0	0	0	0
Public Administration	0	0	0	0	0
Retail Trade	0	0	0	0	0
Transportation and Warehousing	0	0	0	0	0
Wholesale Trade	0	0	0	0	0
Total	0	0	--	--	--

**Table 40 - Business Activity**

Data Source Comments:

## Labor Force

Total Population in the Civilian Labor Force	0
Civilian Employed Population 16 years and over	0
Unemployment Rate	0.00
Unemployment Rate for Ages 16-24	0.00
Unemployment Rate for Ages 25-65	0.00

**Table 41 - Labor Force**

Data Source Comments:

Occupations by Sector	Number of People Median Income
Management, business and financial	0
Farming, fisheries and forestry occupations	0
Service	0
Sales and office	0
Construction, extraction, maintenance and repair	0
Production, transportation and material moving	0

**Table 42 – Occupations by Sector**

Data Source Comments:

## Travel Time

Travel Time	Number	Percentage
< 30 Minutes	0	0%
30-59 Minutes	0	0%
60 or More Minutes	0	0%
<b>Total</b>	<b>0</b>	<b>0%</b>

**Table 43 - Travel Time**

Data Source Comments:

## Education:

### Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	0	0	0
High school graduate (includes equivalency)	0	0	0
Some college or associate's degree	0	0	0
Bachelor's degree or higher	0	0	0

**Table 44 - Educational Attainment by Employment Status**

Data Source Comments:

**Educational Attainment by Age**

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	0	0	0	0	0
9th to 12th grade, no diploma	0	0	0	0	0
High school graduate, GED, or alternative	0	0	0	0	0
Some college, no degree	0	0	0	0	0
Associate's degree	0	0	0	0	0
Bachelor's degree	0	0	0	0	0
Graduate or professional degree	0	0	0	0	0

**Table 45 - Educational Attainment by Age**

Data Source Comments:

**Educational Attainment – Median Earnings in the Past 12 Months**

<b>Educational Attainment</b>	<b>Median Earnings in the Past 12 Months</b>
Less than high school graduate	0
High school graduate (includes equivalency)	0
Some college or associate's degree	0
Bachelor's degree	0
Graduate or professional degree	0

**Table 46 – Median Earnings in the Past 12 Months**

Data Source Comments:

**Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?**

**Describe the workforce and infrastructure needs of the business community:**

**Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.**

**How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?**

**Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.**

**Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDs)?**

**If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.**

**Discussion**

## **MA-50 Needs and Market Analysis Discussion**

### **Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")**

Areas of housing problem concentrations include household that expend more than 30% of their income on housing related costs. These households are concentrated in the low to moderate income census tracts.

### **Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")**

African Americans are highly concentrated in Centralville and Lower Belvidere and Back Central Neighborhoods. Asians are highly concentrated in the Highlands. I am classifying concentration for African Americans as being over 13.3% and Asians as over 31% of the population. Please see attached map.

### **What are the characteristics of the market in these areas/neighborhoods?**

Many of the most distressed neighborhoods have older housing stock, a high vacancy rate, and are areas of low- and moderate-income concentration, as well as minority concentrations.

### **Are there any community assets in these areas/neighborhoods?**

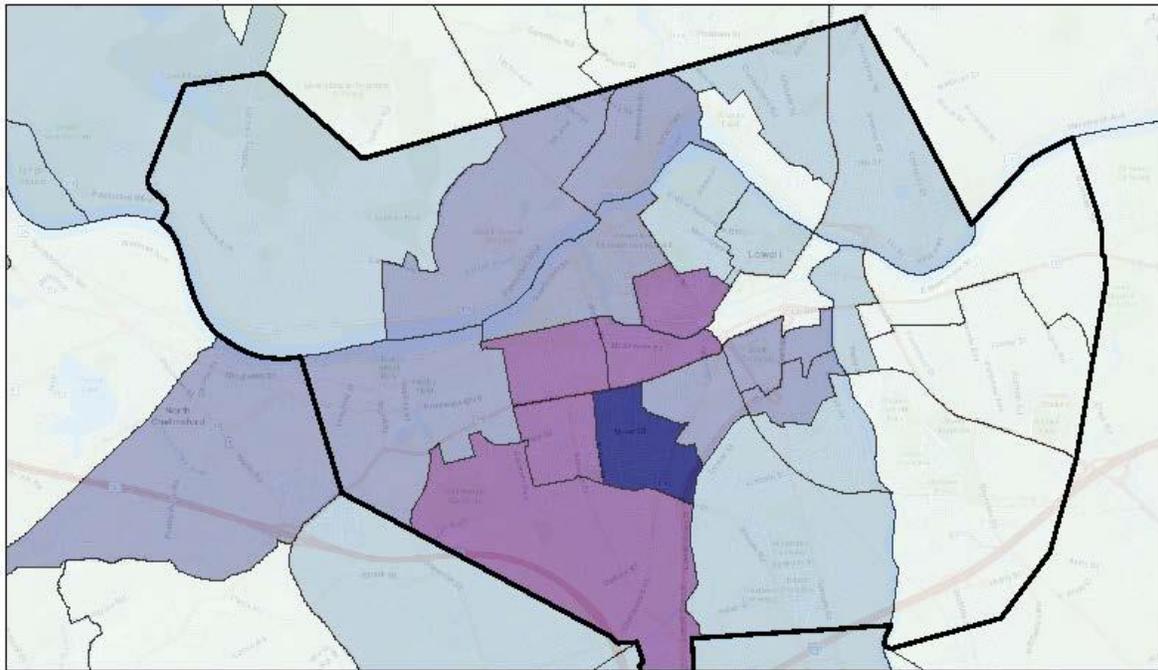
The majority of community service providers are located in, or in the immediate vicinity of the Downtown Census Tract; which also encompasses the entire Downtown Neighborhood. Service providers that utilize CDBG, ESG funds are easily assessable in this location to the persons in need of their services.

### **Are there other strategic opportunities in any of these areas?**

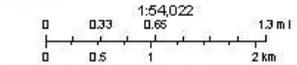
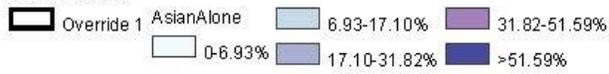
These areas are prioritized for CDBG, ESG, and HOME funds. The goal is to use, most funds to assist low to moderate income households, in which most are located in the area, or utilize services in the area. The city will be prioritizing CDBG funds in the areas around and including the downtown core.



CPD Maps- AsianDemographic Map - Consolidated Plan and Continuum of Care Planning Tool



December 5, 2024



Sources: Cui, HUSK, Garmy, USGS, Maming, INCISSE/IN P, NSCA, Cui, Japan, MCI, East Asia (Hong Kong), East Korea, East (Taiwan), HCCS, Jo, OpenStreetMap contributors, and the GIS User Community

**Minority concentration**

## **MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)**

**Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.**

The City of Lowell is well served for broadband. As a number of providers are available to the City's residential neighborhoods, as shown below. Verizon Communications 99.12%, Viasat 100%, Hughesnet 100% and Xfinity 99.5% availability

**Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.**

Estimates from the American Community Survey (ACS) show that city-wide, 80.8 percent of all households have at least one computer, with 73.1 percent of computer-owning households having internet access broadband subscription and 11 percent having no internet subscription

## **MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)**

### **Describe the jurisdiction's increased natural hazard risks associated with climate change.**

According to the Lowell's Municipal Vulnerability Preparedness and Hazard Mitigation Plan updated in 2020 (CITY OF LOWELL), Lowell is projected to have increased risks to natural hazards associated with climate changes. Top hazards include: flooding, extreme temperatures, extreme winter weather, and wind/microbursts. Flooding risks are anticipated to dramatically increase due to climate change. Under a high emissions scenario, Lowell is expected to experience a statistically significant change in spring precipitation between 5-10% increase in precipitation. Extreme temperatures are projected to increase due to climate change. Current projections indicate that the number of days with temperatures above 90F will increase from 18 days in 2019 to 35 days by the end of the century. Projections also indicate that the number of days with temperatures below 32F will decrease from 135 days in 2019 to 101 days by the end of the century. Current projections indicate that nor'easters are likely to become more frequent and intense due to climate change.

### **Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.**

The vulnerability to these risks of housing occupied by low- and moderate-income households is anticipated to increase with a changing climate. Low- and moderate-income households are less likely to be able to adapt to the projected conditions due to: lack of disposable income to proactively address vulnerabilities to extreme weather; reliance on landlords to provide necessary infrastructure and upgrades that could increase resilience; and mobility limitations (both physical and transportation access).

# Strategic Plan

## SP-05 Overview

### Strategic Plan Overview

## SP-10 Geographic Priorities – 91.215 (a)(1)

### Geographic Area

Table 47 - Geographic Priority Areas

1	<b>Area Name:</b>	City of Lowell
	<b>Area Type:</b>	Eligible activities in the City of Lowell
	<b>Other Target Area Description:</b>	Eligible activities in the City of Lowell
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	
	<b>Include specific housing and commercial characteristics of this target area.</b>	
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	
	<b>Identify the needs in this target area.</b>	
	<b>What are the opportunities for improvement in this target area?</b>	
<b>Are there barriers to improvement in this target area?</b>		
2	<b>Area Name:</b>	FY26-30 NRSA
	<b>Area Type:</b>	Strategy area
	<b>Other Target Area Description:</b>	
	<b>HUD Approval Date:</b>	7/1/2025
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	
	<b>Other Revital Description:</b>	

<p><b>Identify the neighborhood boundaries for this target area.</b></p>	<p>The NRSA will consist of census tracts 388300-4, 310700-3, 388300-1, 388300-2, 310100-2, 310100-1, 311900-1, 312400-1, 311200-1, 311900-2, 311900-1, The census tracts will encompass the Acre, Cambodia Town, parts of Back Central and Lowell Belvidere.</p>
<p><b>Include specific housing and commercial characteristics of this target area.</b></p>	<p>This area has the highest concentration of subsidized rental units within the city. Since this area was also one of the earliest developed sites a good portion of the housing stock is older than 1978. This areas is home to an abundance of service and hospitality sectors which is reliant on residents having an abundance of disposable income. Many of the restaurants rely on patrons going to the Lowell Memorial Auditorium and the Tsongas Center.</p>
<p><b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b></p>	<p>Comments during city council meetings and the public meeting on 12/14 has shown the residents have agreed to concentrate entitlement funds in the area.</p>
<p><b>Identify the needs in this target area.</b></p>	<p>This area has the highest concentration of low- and moderate-income households as well as the epicenter of the homeless crisis in the city. Many households in this area has fixed income and therefore the need for social services is high. This area also hosts 6 family homeless shelters in the community and the largest individual homeless shelter north of Boston.</p>
<p><b>What are the opportunities for improvement in this target area?</b></p>	<p>This area has seen a momentum of investment in the area since the past year. The Upper Merrimack Corridor was given the designation of TDI status by the quasi-state agency MassDevelopment. This designation is geared to areas that will stimulate economic development growth. Umass Lowell has designated a portion of this area to be part of the LINC program. LINC is a new, 1 million-square-foot development designed to meet the facilities, research and workforce needs of companies seeking to relocate to Lowell to work alongside university faculty, researchers and students. Additionally, the city will merge the two urban renewal plans, ACRE and JAM plan in this NRSA.</p>

<p><b>Are there barriers to improvement in this target area?</b></p>	<p>There are many barriers to improvement in the area. The barriers are as follows:</p> <ul style="list-style-type: none"> <li>• Extremely high need of social services for the neighborhood</li> <li>• High proportion of unhoused residents</li> <li>• Commercial turnover</li> <li>• Lack of high skill workers</li> </ul>
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**General Allocation Priorities**

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

Since Lowell's low mod population account for over 51% of the total population, the city will focus all of its activity's city wide. With that being said the city will be creating a NRSA to cover 10 of the city's census tracts. These census tracts cover many of the city's poorest neighborhoods. The NRSA also aligns with 2 of the city's state approved urban renewal plans.

## SP-25 Priority Needs - 91.215(a)(2)

### Priority Needs

Table 48 – Priority Needs Summary

1	<b>Priority Need Name</b>	Housing
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly
	<b>Geographic Areas Affected</b>	Eligible activities in the City of Lowell
	<b>Associated Goals</b>	Healthy and Affordable Housing
	<b>Description</b>	The city will focus on reducing the overall costs of homeownership and rental units within the city.
	<b>Basis for Relative Priority</b>	Many of Lowell's residents are cost burdened. The city will provide opportunities to lower the percentage of cost burdened residents.
	2	<b>Priority Need Name</b>
<b>Priority Level</b>		High
<b>Population</b>		Extremely Low Large Families Families with Children Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Victims of Domestic Violence Unaccompanied Youth

	<b>Geographic Areas Affected</b>	Eligible activities in the City of Lowell
	<b>Associated Goals</b>	Homeless Relief and/or Prevention
	<b>Description</b>	The city will provide resources to alleviate the effects of homelessness for Lowell residents
	<b>Basis for Relative Priority</b>	The homeless population has increased since the pandemic therefore the city will be focusing its ESG allocations to keep housing insecure families housed as well as services to get unhoused households housed.
<b>3</b>	<b>Priority Need Name</b>	Alleviate the high cost of living
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents
	<b>Geographic Areas Affected</b>	Eligible activities in the City of Lowell
	<b>Associated Goals</b>	Public Services
	<b>Description</b>	The public has determined that the high cost of living is a reason for households are not able to meet their monthly living expenses
	<b>Basis for Relative Priority</b>	Residents have noted on various needs assessments that the cost of living was a main barrier to being financially secure.
<b>4</b>	<b>Priority Need Name</b>	Skill Based Learning
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents
	<b>Geographic Areas Affected</b>	Eligible activities in the City of Lowell FY26-30 NRSA
	<b>Associated Goals</b>	Public Services
	<b>Description</b>	To alleviate the high cost of housing and living the city is allocating funds to enhance the skills for low- and moderate-income residents to get better employment so they can better withstand the ever increase cost of living in Lowell.
	<b>Basis for Relative Priority</b>	The city of Lowell will be focusing on enhancing the skills so households can better be able to afford market rate units.
5	<b>Priority Need Name</b>	Improve Public Facilities
	<b>Priority Level</b>	Low
	<b>Population</b>	Extremely Low Low Moderate Non-housing Community Development
	<b>Geographic Areas Affected</b>	Eligible activities in the City of Lowell
	<b>Associated Goals</b>	Public Facilities
	<b>Description</b>	The city will improve public facilities to withstand the effects of climate change or enhance the quality of low and moderate census tracts
	<b>Basis for Relative Priority</b>	Residents are more worried about becoming financially secure than improving public facilities.
6	<b>Priority Need Name</b>	Provide Economic Opportunities

<b>Priority Level</b>	High
<b>Population</b>	Extremely Low Low Moderate Middle
<b>Geographic Areas Affected</b>	Eligible activities in the City of Lowell
<b>Associated Goals</b>	Economic Development
<b>Description</b>	The city will focus on providing small business grants and technical assistance to low- and moderate-income residents. Small business grants will also be provided to for-profit entities to provide employment opportunities for low and moderate households.
<b>Basis for Relative Priority</b>	The city is focusing on a 2-pronged approach to assist with wealth accumulation: small business ownership and skill-based learning.

**Narrative (Optional)**

The city conducted a community needs survey in Spanish, English, Khmer, and Spanish to determine the needs of the community. Also, the city reviewed the community needs survey from the local Community Action Agency to assist in determining these needs. Both surveys concluded that Lowell's high cost of living is making it hard for low- and moderate-income individuals to become financially self sufficient.

## SP-30 Influence of Market Conditions – 91.215 (b)

### Influence of Market Conditions

<b>Affordable Housing Type</b>	<b>Market Characteristics that will influence the use of funds available for housing type</b>
Tenant Based Rental Assistance (TBRA)	<p>Tenant-based rental assistance (TBRA) is a rental subsidy that the City can use to help individual households afford housing costs such as rent and security deposits. The City of Lowell is located in a more expensive housing market, being heavily influenced by the Boston, MA market and contained within the Greater Boston metropolitan statistical area (MSA). Many renters and owner-occupied households have a cost burden greater than 30% of their monthly income. There is a clear need to respond appropriately to this abundant housing problem. The Lowell Housing Authority administers the Section 8 voucher program and demand for this program far exceeds the supply of vouchers. To help ease the gap, especially for the unsheltered homeless population, the City of Lowell has in the past, and may in the future allocate HOME Program funds. Currently, one of the issues facing voucher holders is that they are having difficulty finding units that will accept the voucher.</p>
TBRA for Non-Homeless Special Needs	<p>The market condition is Lowell illustrate a high-cost burden for low-income households with high market housing costs. The City of Lowell supports a number of other programs with ESG funds to support the homelessness prevention and possibly in the future rapid rehousing activities. HOME funds are also used to support the construction of affordable housing units. HOME ARP will be used to provide supportive services and rental housing units specifically catered to disadvantaged populations including but not limited to, homeless families and Domestic violence victims. Partnerships with local social service agencies will provide wrap-around support services to help ensure long-term stability and self-sufficiency of those assisted. Additionally, HOPWA TRBA funds are used throughout Middlesex and Essex County to support eligible households by supplementing their income to afford housing.</p>

<b>Affordable Housing Type</b>	<b>Market Characteristics that will influence the use of funds available for housing type</b>
New Unit Production	<p>New housing units include: Cost of land; cost of infrastructure improvements required for development of land; development impact fees; construction regulations; and general economic conditions, including income and employment levels and market interest rates. With nearly 50% of Lowell’s housing stock having been built before 1940, the City recognizes the value of supporting redevelopment projects, particularly in cases where planned improvements result in safer, higher-quality, and more energy efficient homes for Lowell residents. Lowell remains one of only a handful of communities that exceeds the State’s goal of 10% affordability under MGL Chapter 40B, thereby providing housing to assist low-income residents in need. High interest rates and increasing construction costs have created barriers to developing affordable housing without deep subsidies.</p> <p>The city is in the midst of getting a housing production plan and Master plan approved. While that is being done the main takeaways to spur housing production is to plan for more equitable and sustainable growth. This goal will focus the city on prioritizing development sites for multi-family housing, more housing development in retail areas, and to prioritize surplus public property for housing development. City will also prioritize housing units for all income and ability levels. This means that the city will prioritize developing housing that meets all residents needs instead of moderate and high wage earners. The city is also looking to expand housing choice in all neighborhoods.</p> <p>Through partnership with non-profit housing organizations, funding will support the objective to provide affordable housing to lower income households by expanding and maintaining the supply of decent, safe, sanitary, accessible, and affordable rental housing, expanding the capacity of non-profit housing providers, strengthening the ability of state and local governments to provide housing, and leveraging private sector participation. Eligible activities that would increase legitimate units in the City with HOME and CDBG funds would be acquisition and rehabilitation of existing rental housing, rehabilitation of existing rental housing, new construction of rental housing, and conversion of mill space into residential units. The City will focus funding to alleviate market funding gap into projects the yield that highest return to the local economy and community, and have the highest potential to spur concurrent project</p>

<b>Affordable Housing Type</b>	<b>Market Characteristics that will influence the use of funds available for housing type</b>
Rehabilitation	<p>Market factors influencing the rehabilitation of housing include: age of housing stock; general economic conditions, including income and employment levels as factors which affect whether homeowners repair their homes or not; positive rate of return; presence of lead-based paint, and market interest rates. Given Lowell is an older City on the East coast, there are many older homes with demonstrated housing problems and presence of lead paint. An older housing stock necessitates a disproportional amount of funding, in comparison to newer markets, to maintaining a healthy housing stock. Of the City's current housing stock, over 40% percent was constructed prior to 1980 and older housing, which typically carries greater maintenance costs, is more likely to fall into substandard condition. The City will continue to prioritize a portion of its federal funds to assist low-income homeowners with housing rehabilitation. CDBG housing rehab funds are awarded on an emergency basis and support situations such as collapsed sewer pipes that require immediate assistance. HOME funded rehab loans bring units into compliance and afford the residents safe, sanitary and healthy homes. Often HOME rehab funds are used in conjunction with the City's lead paint abatement program. Funding is provided in a zero-interest differed loan, due upon sale, transfer or refinancing (DUSTER). All CDBG and HOME housing rehabilitation DUSTER loans include both owner-occupied and renter-occupied eligible units.</p>
Acquisition, including preservation	<p>There are a number of opportunities to redevelop older industrial sites which serve economic, recreational, and historic purposes, and can add to the vitality of their surroundings. Being a historically planned and dense city, market conditions dictate that when possible, more value can be obtained from preservation. As a result Lowell's Master Plan, Lowell Forward proposals to develop and implement a Housing Development Zone for the Downtown under Massachusetts General Law Chapter 40V; prioritize the use of existing subsidy programs to facilitate projects that have economic and redevelopment benefits in addition to housing and/or historic preservation value, and advocate for enhanced subsidy to close financing gaps which compromise the economic viability of Downtown redevelopment in Gateway Cities like Lowell; continue to promote the conversion of historic mill buildings and vacant upper stories of commercial buildings in the downtown area to residential units, artist live/work spaces, and other uses as deemed appropriate; and continue to take advantage of available opportunities to market and promote downtown Lowell as a city on the rise</p>

**Table 49 – Influence of Market Conditions**

**SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)**

**Introduction**

**Anticipated Resources**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	2,000,000	0	0	2,000,000	80,000,000	Funds will be used to support a variety of social service programs economic development activities as well as public facility and infrastructure improvement.

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: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	700,000	0	0	700,000	2,800,000	HOME Funds will be used to provide down payment assistance to first-time homebuyers support homeowner rehab activities and support development projects.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	170,000	0	0	170,000	680,000	ESG funds will support operating costs and essential services at homeless shelters. Funds will also support homeless prevention or rapid rehousing

Table 50 - Anticipated Resources

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

Federal funds will be used to leverage other public and private resources in the housing, public facilities, public services, and economic development areas. Matching fund requirements, along with the needed documentation, are specified in the subrecipient agreements. Matching funds include nonfederal cash sources, infrastructure, appraised land/real property, and site preparation, construction materials, and donated labor. The City and its program partners will seek funds from the following sources to support the goals identified in this Plan: Project-based Section 8 certificates through the Lowell Housing Authority, Low-Income Housing Tax Credits, project financing at favorable interest rates from the Lowell Development and Financial Corporation and local lenders, and private contributions to subrecipients. The City of Lowell has documented more than \$4 million in excess matching funds from prior program years to meet HOME Program match requirements. Nevertheless, Lowell will continue to identify funding from the Massachusetts Rental Voucher Program, operated by the Executive Office of Housing and Livable Communities, as a source of additional match. In order to meet its ESG match requirements, the City of Lowell requires all ESG subrecipients to demonstrate a 100% match using other eligible federal, state, local, or private resources

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

During the duration of this Consolidated Plan CDBG funds are expected to be used to support the development of community gardens on city-owned property and make improvements to city-owned property either outdoor and recreation space or buildings used by disadvantaged populations. These projects are targeted in neighborhoods with high concentrations of low- and moderate-income households.

**Discussion**

The City of Lowell will continue to utilize a competitive application process and diversification of funds across multiple activities to ensure the best projects serving the lowest income and most in need are funded. Local funding and minimum matching requirements will continue to be required to ensure funding is diversified across multiple agencies. The City of Lowell will continue to review the needs of the residents and adjust funding where needed over the next 5 years and adjust if funding is reduced.

## SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Lowell, Department of Planning & Development	Government	Economic Development Homelessness Non-homeless special needs Ownership Planning Public Housing Rental neighborhood improvements public facilities public services	

**Table 51 - Institutional Delivery Structure**

### Assess of Strengths and Gaps in the Institutional Delivery System

The City of Lowell, community leaders and residents are interested in implementing Consolidated Plan programs that are not obstructed by internal or external institutional challenges; committed to identifying gaps and barriers within the delivery system; and working together to create a plan to solve them. One of Lowell’s major strengths is a single pointed oversight of multiple federal programs. The City’s Department of Planning and Development is the lead agency for the implementation of the Community Development Block Grant including: research, coordination, compilation of the Five-Year Consolidated Plan, annual Action Plans, the Consolidated Annual Performance and Evaluation Report (CAPER), and compliance review of CDBG-funded projects. DPD also administers CDBG-funded programs, HOME and ESG programs.

Private, non-profit and faith-based organizations within the jurisdiction work collaboratively in the areas of housing, homeless services, food security, education, employment, job training, community service and economic development. Strong committed partners and effective programs within the institutional delivery system develop and undertake critically needed community development activities targeted to homeless persons and persons with HIV and mainstream services. Despite these efforts and however strong the partnerships and institutional structure that Lowell has built, low wages, high housing costs and shortage of housing and services supports for families, individuals, seniors and youth experiencing homelessness and others at risk of homelessness are increasing due to housing instability. In addition,

an increasing number of landlords are refusing to take housing vouchers due to perceived destructive tenant behaviors; and limited or no available case management services and/or funding available to defray costs associated with damage to property. Moreover, decreasing Consolidated Plan resources are insufficient to prevent service gaps due to the size and extent of need within the jurisdiction.

**Availability of services targeted to homeless persons and persons with HIV and mainstream services**

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
<b>Homelessness Prevention Services</b>			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	X
Mortgage Assistance	X		
Rental Assistance	X	X	X
Utilities Assistance	X	X	X
<b>Street Outreach Services</b>			
Law Enforcement	X	X	X
Mobile Clinics		X	
Other Street Outreach Services	X	X	X
<b>Supportive Services</b>			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X	X	
Employment and Employment Training	X	X	X
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	
Mental Health Counseling	X	X	
Transportation	X	X	X
<b>Other</b>			

**Table 52 - Homeless Prevention Services Summary**

**Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)**

There is currently a wide array of services directed towards the needs of persons living with HIV/AIDS. Since there is a longstanding approach to HIV/AIDS from a medical perspective, services for these clients become medically driven: case management, primary care, pharmacology, treatment, mental health In addition, since there is a vast amount of specialized case management, there are complex and abundant

homeless services tied to medical services for those living with HIV/AIDS. The exception is in the area of education and employment training. Often, those living with HIV/AIDS seek assistance when their condition has reached a high level of disability. Naturally, there is usually not much urgency for education or employment training at this point of crisis. Additionally, HIV/AIDS services are currently more medically oriented, and the HIV/AIDS diagnosis is the leading diagnosis for most services, rather than identifying and addressing long standing causal issues. The Homeless Population through the City's Homelessness initiative Director is to ensure that homeless persons are linked to mainstream resources rather than create another service system to provide what should be community-based services specifically for the homeless. In order for persons to successfully exit the homeless system they have to have access to stable housing and that most often means the need for a stable source of income. It is therefore crucial that case management services are available to assist homeless persons in navigating public benefit system.

**Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above**

The strengths of the system include an ongoing reassessment of the delivery service with an eye toward reducing structural barriers. Actions of Transitional Assistance and Housing and Community Development: enhancing existing partnerships with the Hunger and Homeless Commission and the formation of the Homelessness task force; Community Teamwork, Inc. a regional housing agency; working to streamline multiple application procedures; and reduce language barriers. The city is working with the Continuum of Care to gain access to the Homeless Management Information System. This will allow the city to get up to date data from a single point of entry rather than compiling data from multiple agencies. Movement is underway towards a "one person one file" platform for Massachusetts Continuums of Care that can track housing and services statewide. Currently, the city is experiencing a funding crisis for homeless services. Many of the pandemic relief funds are drying up thereby causing organizations to limit their hours or close altogether. Frequently changing state and local policies is making it difficult for the city to meet the constant changing homeless needs. The city is looking for organizations to fill the gap of these service providers.

Although Medicaid can cover services for individuals experiencing chronic homelessness and others other options available under the Affordable Health Act, barriers to address housing for chronically homeless, mentally ill and/or those experiencing substance abuse are increasing. As stated earlier an increasing number of landlords have been refusing to take housing vouchers due to destructive tenant behaviors; and limited or no available case management services and/or funding available to defray costs associated with damage to property. Lastly the jurisdiction is working on the creation of new more comprehensive outreach program based that coordinates with a network of caseworkers through coordinated entry from multi-discipline agencies and institutions. To aid these initiatives, the city is setting aside \$641,119 for supportive services in HOME- ARP funds.

**Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs**

The city finally merged the Lowell COC with the Balance of State COC. As part of this process, the city is a member of the COC planning meetings to ensure that the city's needs are being addressed. As part of this coordination this city is aligning the ESG funds with goals of the COC and tweaking its funding allocations as needed to meet local conditions. The city's focus is to reduce homelessness by increasing access to mainstream benefits; ongoing coordination of Lowell's community response to homelessness; and enhance and/or put in place new mechanisms needed to improve front door staff training in the areas of benefit eligibility and documentation, professional ethics, interactions with potential clients, and relationships with staff from mainstream services provider agencies. Moreover, the city as the central organizing structure is working to improve overall communication among and between all of its collaborative partners. Members include a wide array of federal, state and local government organizations, nonprofits, community and faith-based organizations, and private industry. As an example of strategic planning, below is a summary of a local strategy to overcome a major gap in the system that of creating permanent housing for unaccompanied homeless youth not associated with the Foster Care system

## SP-45 Goals Summary – 91.215(a)(4)

### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Facilities	2025	2029	Non-Housing Community Development Climate Resiliency	City of Lowell	Improve Public Facilities		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 500000 Persons Assisted
2	Homeless Relief and/or Prevention	2025	2029	Homeless	City of Lowell	Homeless Relief		Homeless Person Overnight Shelter: 100 Persons Assisted  Homelessness Prevention: 25 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Healthy and Affordable Housing	2025	2029	Affordable Housing Public Housing	City of Lowell	Housing		Public service activities for Low/Moderate Income Housing Benefit: 10 Households Assisted  Rental units rehabilitated: 2 Household Housing Unit  Homeowner Housing Rehabilitated: 10 Household Housing Unit  Direct Financial Assistance to Homebuyers: 20 Households Assisted  Housing Code Enforcement/Foreclosed Property Care: 1000 Household Housing Unit
4	Economic Development	2025	2029	Non-Housing Community Development	City of Lowell	Provide Economic Opportunities		Jobs created/retained: 25 Jobs  Businesses assisted: 35 Businesses Assisted
5	Public Services	2025	2029	Non-Homeless Special Needs Non-Housing Community Development	City of Lowell	Alleviate the high cost of living Skill Based Learning		Public service activities for Low/Moderate Income Housing Benefit: 600 Households Assisted

**Table 53 – Goals Summary**

**Goal Descriptions**

1	<b>Goal Name</b>	Public Facilities
	<b>Goal Description</b>	The City will create and/or improve public facilities that will enhance the quality of life for low-mod residents. Special emphasis will be placed on enhancing climate resiliency within the neighborhoods.
2	<b>Goal Name</b>	Homeless Relief and/or Prevention
	<b>Goal Description</b>	The City will fund projects that will provide homeless services to unsheltered residents. Also, the city will provide services to prevent homelessness.
3	<b>Goal Name</b>	Healthy and Affordable Housing
	<b>Goal Description</b>	The city will allocate funds to correct code violations through housing rehab and provide funds to construct affordable housing. Additionally, the city will provide financial assistance to first time homebuyers.
4	<b>Goal Name</b>	Economic Development
	<b>Goal Description</b>	The city will provide small businesses grants to microenterprise and job creators. The City will also provide funds to provide technical assistance to providers to enhance the profitability of small businesses.
5	<b>Goal Name</b>	Public Services
	<b>Goal Description</b>	The City will provide funding to public services focusing on cost-of-living issues and skill-based development. As part of the NRSA the city will allocate 30% of its funds to these projects. 15% of the funds will be used to enhance the skills of low- and moderate-income households

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)**

Approximately 22 extremely low-income, low-income, and moderate-income families will be providing affordable housing services as defined by HOME through the following programs:

- City of Lowell, DPD - First Time Homebuyer Program
- City of Lowell, DPD - HOME Housing Rehab
- Merrimack Valley Housing Partnership - First Time Homebuyer Down Payment Assistance Program

## **SP-50 Public Housing Accessibility and Involvement – 91.215(c)**

### **Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)**

As previously stated, The LHA plan to increase 5 to 10 additional handicap accessible units for elderly and disabled developments within the next 5 years.

### **Activities to Increase Resident Involvements**

In an effort to address the needs of public housing residents, the Lowell Housing Authority offers its tenants opportunities to become involved in LHA management and policy implementation. LHA also provides a variety of activities aimed at self-sufficiency and homeownership among its residents

### **Is the public housing agency designated as troubled under 24 CFR part 902?**

No

### **Plan to remove the ‘troubled’ designation**

LHA is not a troubled housing authority.

## **SP-55 Barriers to affordable housing – 91.215(h)**

### **Barriers to Affordable Housing**

The only negative effects currently is the predominate use of single-family zoning in a majority of residential areas. These single-family zones make it difficult to build enough housing stock to adequately meet the demand.

### **Strategy to Remove or Ameliorate the Barriers to Affordable Housing**

The City of Lowell continues to work to eliminate barriers that may limit the production or feasibility of affordable housing as there is a number of State and local regulations designed to promote the orderly development of safe, decent and sanitary housing. Foremost among these are zoning and land-use regulations. As part of the state's MBTA communities act the city filed a compliant plan to create some housing overlay districts that will permit increased housing production in various census tracts. All of the census tracts are located in low mod areas.

The Council endorsed Sustainable Lowell Forward a substantial update to the 2003 plan. The document weaves the concepts of social, economic, and environmental sustainability in each section. Objectives of the section on Housing Choice aim to provide a range of safe, fair, high quality and affordable housing opportunities for residents of all backgrounds. Under the current zoning, more than 38% of the City's land area is zoned to allow multi-family development in residential or mixed-use zoning districts. Even the most restrictive single-family zone allows more than four units per acre. In addition, the City's Zoning Ordinance encourages the conversion of existing buildings including schools, churches, firehouses, and obsolete industrial buildings into multi-family residential uses, even when those buildings are located in single-family zoning districts. In certain urban mixed-use zoning districts parking restrictions are limited to one space per unit, and by-right waiver for half of residential parking requirements is provided if a parking structure is located between 400 to 1,500 feet from the project site based on the zoning district. In the future, the City anticipates the continued implementation of Lowell's Zoning Ordinance and evaluating its effectiveness at meeting the goals of the master Plan including promoting the concept of Lowell as a "Lifetime City." Particular attention will be paid to how the code impacts affordable housing projects as Lowell's permit fees and development review process are also some of the lest burdensome in the region. The City does not charge development impact fees or technical review fees that are permitted under Massachusetts General Law and places no special permitting reviews on affordable housing projects that would not be required of all developments.

### **fair housing**

Additionally, the city as part of the Housing Production Plan listed the following strategies to ameliorate the barriers to affordable housing

Ensure fair housing policies and practices 7.1. Develop a Fair Housing Action Plan Develop a Fair Housing Action Plan, which would analyze and make recommendations to improve city programs, policies, and practices. This action's objective is to ensure that the City is affirmatively furthering fair housing. As a recipient of federal community development and planning funds through HUD, the City must work to eliminate disparities in access to opportunity in accordance with fair housing laws. Fair housing laws (Fair Housing Act (Title VIII of the 1968 Civil Rights Act) and M.G.L. Chapter 151B) address discrimination based on characteristics that are called "protected classes" in fair housing law, and include the following: race; color; national origin; religion; sex; sexual orientation; gender identity; familial status (presence of children); disability; marital status; age (40 and older); genetic information; military service; source of income (housing vouchers); and arrest record. The City should develop a plan, which would include but is not limited to researching data sources and documenting protected classes' ability to access opportunity, disparities in access, structural barriers to fair housing, and education and enforcement of fair housing laws. The plan would recommend any amendments to the Zoning Bylaw to ensure compliance with fair housing laws. This may include modifications to ensure that the City allows the protected uses referenced in M.G.L. Ch 40A Sec. 3, commonly known as the Dover Amendment; properly handles requests for reasonable accommodations; and uses nondiscriminatory definitions and other language. This may include evaluation of the definition of "family" in the zoning code . The plan would also research where rental vouchers including Section 8 are utilized to ensure broad access and ensure that they are fairly accepted and geographically distributed

. Require land use board, Council, and staff receive training on fair housing laws Develop a policy requiring members of land use boards (Planning Board and Zoning Board of Appeals), City Council, and their staff to receive trainings on fair housing laws and affirmatively furthering fair housing

## **SP-60 Homelessness Strategy – 91.215(d)**

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

The role of Director of Homelessness Initiatives was created and funded with a mandate to increase coordination among existing providers, and to create programming that addresses the needs of the most vulnerable individuals in the city. The Director has created an outreach and engagement team made up of various community providers that will work to engage and assess individuals experiencing homelessness, with a specific focus on reaching out to individuals sleeping in camps or other areas not meant for human habitation. As part of this role the engagement team meets with homeless people to assess their needs on a weekly basis. In addition to conducting the annual homeless census count the Director of Homeless Initiatives office leads and conducts a basic homeless survey each year.

### **Addressing the emergency and transitional housing needs of homeless persons**

The City is collaborating with South Middlesex Opportunity Council (SMOC), who provides oversight for the Lowell Transitional Living Center (LTLC). This collaboration includes improving data collection and reporting for LTLC, which will increase capacity to connect clients to available resources. Additionally, the City collaborates with the Executive Office of Housing and Livable Communities (EOHLC) providing oversight for Balance of State Continuum of Care. EOHLC will continue to apply for funds to support the various shelters in the City. The City through its partnership with EOHLC and the Health Department design's RFP's and strategies to meet the priority needs for both emergency shelter and longer term housing.

### **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.**

The City, through the Director of Homelessness Initiatives, is collaborating on a variety of programs with the majority of the area's providers through an outreach program for individuals experiencing homelessness. The Homeless Initiatives office also provides information conducted by Community Teamwork (CTI) from CTI's Mass Youth Count, which is a project of the Massachusetts Unaccompanied Homeless Youth Commission. The city through the state's HMIS system, local conditions, and data analysis makes informed decisions on how to best allocate ESG and CDBG funds to address housing needs for formerly and currently homeless households. Working in conjunction with several area providers, the City is looking to increase triage and diversion efforts at several sites including the hospitals and shelter. The City is also working on increasing the availability of affordable units through partnerships with the Lowell Housing Authority and SMOC.

**Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs**

The City is moving towards partnerships that will allow for more upstream identification of individuals at risk of homelessness, particularly those being put at risk by behaviors related to hoarding. Increased coordination with various providers, including the CAP agency Community Teamwork, looks to engage individuals prior to entering homelessness, especially individuals who are risk of homelessness due to being rent burdened. The City is also exploring the availability of funds through grants for a “red flag” early warning system that could work to encourage the community to ask for help sooner, and through more appropriate channels to ensure a proactive solution that prevents the incidence of homelessness before it starts.

## **SP-65 Lead based paint Hazards – 91.215(i)**

### **Actions to address LBP hazards and increase access to housing without LBP hazards**

The majority of Lowell's housing stock was built prior to 1950. Because of the age of Lowell's housing, there is a high prevalence of substandard units and units containing lead paint. This is particularly true among rental units. The City of Lowell has historically administered a lead-based paint abatement program, funded through HUD Lead Hazard Control Grants, these grants allowed the City to address a significant amount of these single family and multifamily housing units that had LEAD paint surfaces. The City of Lowell having addressed a significant amount of these hazards has now partnered with the Massachusetts Housing Partnership's "Get the Lead Out" program for additional financial support of de-leading activities. The City is confident that this partnership will continue to assist Lowell households in the abatement of LEAD paint hazards and provide households with housing free of LEAD based paint hazards.

### **How are the actions listed above related to the extent of lead poisoning and hazards?**

Lowell has had experience managing programs for the evaluation and reduction of lead paint hazards in residential properties since 1998. With grant funding from the HUD Office of Healthy Homes and Lead Hazard Control the Lowell Lead Program has been able to provide financial and technical assistance to low-income homeowners and owners that rent to low-income tenants in order to achieve compliance with HUD requirements and the Massachusetts Lead Law. Housed in the Department of Planning and Development, the Lowell Lead Program has now transitioned to be an integral part of the services offered by the Housing Rehabilitation Program. The Lowell Housing Rehabilitation program is also supported by MassHousing "Get the Lead Out" loans and contributions from property owners. In order to preserve and encourage affordable housing in the City of Lowell, partnerships with the following agencies have been established to successfully reach the Lowell households with LEAD based paint hazards: Lowell Inspectional services Department , Merrimack Valley Housing Partnership (MVHP), MassHousing Get the Lead Out Loan Program The Lowell Housing Rehabilitation Program will continue, as funding levels allow, working with partners and the Massachusetts Childhood Lead Poisoning Prevention Program to identify households with lead based paint hazards and assist property owners to obtain compliance with the Mass Lead Law.

### **How are the actions listed above integrated into housing policies and procedures?**

CDBG and HOME funded housing-rehab programs address lead-paint in the home in conjunction with Lead Paint abatement work when appropriate. All housing rehabilitation applicants are first referred to a LEAD Paint inspector for review of their lead hazard compliance. The MVHP will qualify applicants while the City will make sure the lead paint requirements are addressed during the rehabilitation assistance process. This assures compliance with Title X, Sections 1012 and 1013. In addition, each property is reviewed by the Lowell Historic Board in order to determine if there are specific requirements based on the age or location of the property. The Section 8 Rental Assistance Programs operated by Community

Teamwork, Inc. and the Lowell Housing Authority also rely on deleading assistance and resources offered by the City of Lowell in order to assure that all units occupied by a child under 6 years old are in compliance with the Mass Lead Law. The City's Housing Department remains committed to its mission and will make every attempt during the next five years in the Consolidated Plan period towards the goal of eliminating lead paint hazards in Lowell

## **SP-70 Anti-Poverty Strategy – 91.215(j)**

### **Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families**

One goal of the Consolidated Plan programs and other initiatives in Lowell is to reduce the number of persons in poverty. The emphasis in Lowell is to help people rise out of poverty, rather than merely easing their situation temporarily. Although essential short-term direct aid such as emergency food and shelter is provided, the thrust of the City's policy is to address poverty's root causes and assist people in becoming self-sufficient in the long term.

Two key components of helping people attain self-sufficiency are employment and housing. Examples of programs that directly influence people's ability to escape poverty include job education, micro-enterprise training an assistance, enrichment, development, and job placement services as well as housing advocacy, homelessness prevention, expiring use prevention and rental and home ownership assistance. Projects that indirectly affect poverty include those that upgrade the community and provide transportation and childcare services that help people access employment and services. CDBG, HOME, and ESG funds are often used as matching funds for other grants that also contribute to reducing the number of poverty level families. Thus, the power of these federal dollars is leveraged to the fullest extent possible. Recognizing that limited Consolidated Plan dollars should be focused where the need is greatest, Lowell gives preferences projects that directly benefit low- and moderate-income residents or serve low- and moderate-income neighborhoods over those that will benefit the City as a whole. This strategy will ensure that scarce resources are directed to best serve those who have the greatest need, including those areas with the greatest concentration of poverty. In addition to Consolidated Plan programs, a number of other public, private and partnership initiatives have been designed to assist in the reduction of poverty rates. These programs include Family Self Sufficiency, Head Start, the Workforce Investment Board, McKinney grants, the Hunger Homeless Commission and the SHIFT Coalition.

### **How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan**

By collaborating between agencies and ensuring gaps in services and funding are addressed, while maximizing the utilization of each funding source. The City will continue to refer housing program participants to local community resources and programs, as participant needs are identified.

## **SP-80 Monitoring – 91.230**

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

The DPD has developed an internal management plan to assure the proper timely implementation of the strategic plan and the annual plan. Procedures have been put in place to assure the proper compliance with all program requirements for the CDBG, HOME, and ESG entitlements. DPD project managers are responsible for monitoring their assigned projects and activities. Priority is given to new projects or organizations. At least quarterly “desk audits” or programs allow project managers a chance to track the timeliness of expenditures. On-site monitoring provides an opportunity for DPD staff members to ensure sub-recipients are in compliance with Federal regulations and are actively working to achieve the objectives outlined in their grant agreements and the Annual Actin Plan. Site visits also allow sub-recipients to receive technical assistance and provide feedback about program administration. By carefully examining sub-recipients' performance through quarterly desk audits, DPD can conduct risk-assessment to identify which sub-recipients require more comprehensive monitoring. City has also developed a new risk analysis matrix to determine who needs more technical assistance and/or will require on-site or remote monitoring. High risk sub-recipients might include those new to CDBG, HOME, or ESG programs; those who experienced turnover in key staff positions or a change in goals or direction; those with previous compliance or performance problems including failure to meet schedules, submit timely reports, or clear monitoring or audit findings; those carrying out high-risk activities (such as economic development); and those undertaking multiple CDBG, HOME, or ESG funded activities for the first time. A monitoring schedule will be prepared based on this risk assessment. First, the assigned monitor will contact the agency to explain the purpose of monitoring and schedule a date and time for the on-site visit. Once this is completed, a confirmation letter is sent before the scheduled visit to confirm all aspects of the monitoring and to explain what can be expected. During the actual visit, a thorough review of the sub-recipients' files ensures they comply with all regulations governing their administrative, financial and programmatic operations and that they are achieving their performance objectives within schedule and budget. A clear written record of the on-site visit is kept by using one or more of the City of Lowell's monitoring checklists. The assigned monitor will fill out the form during the visit. At the end of the visit, the monitor concludes the visit by reviewing the tentative conclusions from the monitoring. Once the on-site visit is completed, the monitor prepares a formal written letter describing the results of the visit, providing recognition of the subrecipient's strengths and weaknesses. If the sub-recipient is experiencing problems or failing to comply with regulations, these issues will be specifically outlined in the monitoring follow-up letter, along with recommendations or requirements to address and rectify the problems. If concern or finding is issued for noncompliance with Federal rules and regulations, the monitoring follow-up letter will provide recommendations on how the situation can be remedied, but no additional action is required. When a finding is issued, the monitoring follow-up letter will identify a deadline for when the specific issues must be corrected. The monitor will then follow-up with the organization to make sure the corrections have been made. For situations in which

the recommended corrections have not been made, the organization will be placed on a probationary period, which must be approved by the Assistant City Manager/DPD Director, until the issues have been rectified, and the sub-recipient is once again in compliance with Federal regulations and the grant agreement.

## Expected Resources

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

#### Introduction

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	2,000,000.00	0.00	0.00	2,000,000.00	80,000,000.00	Funds will be used to support a variety of social service programs economic development activities as well as public facility and infrastructure improvement.

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: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	700,000.00	0.00	0.00	700,000.00	2,800,000.00	HOME Funds will be used to provide down payment assistance to first-time homebuyer's support homeowner rehab activities and support development projects.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	170,000.00	0.00	0.00	170,000.00	680,000.00	ESG funds will support operating costs and essential services at homeless shelters. Funds will also support homeless prevention or rapid rehousing

**Table 54 - 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**

Federal funds will be used to leverage other public and private resources in the housing, public facilities, public services, and economic development areas. Matching fund requirements, along with the needed documentation, are specified in the subrecipient agreements. Matching funds include nonfederal cash sources, infrastructure, appraised land/real property, and site preparation, construction materials, and donated labor. The City and its program partners will seek funds from the following sources to support the goals identified in this Plan: Project-based Section 8 certificates through the Lowell Housing Authority, Low-Income Housing Tax Credits, project financing at favorable interest rates from the Lowell Development and Financial Corporation and local lenders, and private contributions to subrecipients. The City of Lowell has documented more than \$4 million in excess matching funds from prior program years to meet HOME Program match requirements. Nevertheless, Lowell will continue to identify funding from the Massachusetts Rental Voucher Program, operated by the Executive Office of Housing and Livable Communities, as a source of additional match. In order to meet its ESG match requirements, the City of Lowell requires all ESG subrecipients to demonstrate a 100% match using other eligible federal, state, local, or private resources

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

During the duration of this Consolidated Plan CDBG funds are expected to be used to support the development of community gardens on city-owned property and make improvements to city-owned property either outdoor and recreation space or buildings used by disadvantaged populations. These projects are targeted in neighborhoods with high concentrations of low- and moderate-income households.

**Discussion**

The City of Lowell will continue to utilize a competitive application process and diversification of funds across multiple activities to ensure the best projects serving the lowest income and most in need are funded. Local funding and minimum matching requirements will continue to be required to ensure funding is diversified across multiple agencies. The City of Lowell will continue to review the needs of the residents and adjust funding where needed over the next 5 years and adjust if funding is reduced.

## 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
1	Homeless Relief and/or Prevention	2025	2029	Homeless		Homeless Relief		Homeless Person Overnight Shelter: 50 Persons Assisted Homelessness Prevention: 5 Persons Assisted
2	Public Facilities	2025	2029	Non-Housing Community Development Climate Resiliency				Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 100000 Persons Assisted
3	Healthy and Affordable Housing	2025	2029	Affordable Housing Public Housing	City of Lowell			Rental units constructed: 5 Household Housing Unit Rental units rehabilitated: 2 Household Housing Unit Homeowner Housing Rehabilitated: 2 Household Housing Unit Direct Financial Assistance to Homebuyers: 5 Households Assisted
4	Economic Development	2025	2029	Non-Housing Community Development	City of Lowell	Provide Economic Opportunities		Jobs created/retained: 5 Jobs Businesses assisted: 5 Businesses Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Public Services	2025	2029	Non-Homeless Special Needs Non-Housing Community Development	City of Lowell			Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted

Table 55 – Goals Summary

### Goal Descriptions

1	Goal Name	Homeless Relief and/or Prevention
	Goal Description	
2	Goal Name	Public Facilities
	Goal Description	
3	Goal Name	Healthy and Affordable Housing
	Goal Description	
4	Goal Name	Economic Development
	Goal Description	
5	Goal Name	Public Services
	Goal Description	



# Projects

## AP-35 Projects – 91.220(d)

### Introduction

The city will be funding 6 categories of projects. Each of the projects will focus on a variety of issues such as housing rehab/development, public facilities, administration, homeless projects, economic development, and public services. Funding levels in the proposal conplan and action plan are estimated amounts. Once HUD provides us final allocations we will adjust our figures accordingly to meet federal financial statutory requirements

### Projects

#	Project Name
1	Homeless Projects
2	Economic Development
3	Housing
4	Public Facilities
5	Public Services
6	CDBG Admin

Table 56 – Project Information

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

The city conducted a community needs survey in Spanish, English, Khmer, and Spanish to determine the needs of the community. Also, the city reviewed the community needs survey from the local Community Action Agency to assist in determining these needs. Both surveys concluded that Lowell's high cost of living is making it hard for low and moderate income individuals to become financially self sufficient. With the expiration of pandemic relief funds many organizations have been unable to maintain the same level of service.

**AP-38 Project Summary**  
**Project Summary Information**

1	<b>Project Name</b>	Homeless Projects
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	Homeless Relief
	<b>Funding</b>	:
	<b>Description</b>	
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
2	<b>Project Name</b>	Economic Development
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	Provide Economic Opportunities
	<b>Funding</b>	:
	<b>Description</b>	
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
3	<b>Project Name</b>	Housing
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	
	<b>Funding</b>	:
	<b>Description</b>	
	<b>Target Date</b>	

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>4</b>	<b>Project Name</b>	Public Facilities
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	Improve Public Facilities
	<b>Funding</b>	:
	<b>Description</b>	
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>5</b>	<b>Project Name</b>	Public Services
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	Alleviate the high cost of living Skill Based Learning
	<b>Funding</b>	:
	<b>Description</b>	
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>6</b>	<b>Project Name</b>	CDBG Admin
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	

<b>Funding</b>	:
<b>Description</b>	
<b>Target Date</b>	
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
<b>Location Description</b>	
<b>Planned Activities</b>	

## 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

Lowell is 51% low mod so most residents will benefit from these funds city wide. While the majority of non-profits that are being funded are primarily located within downtown Lowell, many of their clients are scattered through the city. All of the public facility projects are located within low-mod census tracts.

### Geographic Distribution

Target Area	Percentage of Funds
City of Lowell	94
FY26-30 NRSA	6

Table 57 - Geographic Distribution

### Rationale for the priorities for allocating investments geographically

Due to Lowell's compact size, the city purposefully did not set target areas except that projects must provide investment to areas that have a majority low mod population. Many of the projects funded will attract residents from multiple neighborhoods. All of these projects are close to the intermodal transportation center and thus is easily accessible by public transportation. Though the city is paying attention to the urban core areas surrounding the downtown with the development of the NRSA. These census tracts have historically had the greatest population of low mod households living in the area. Additionally, the city has been focusing on the NRSA for awhile with the development of 2 urban renewal plans for these areas. This NRSA will tie in these plans.

### Discussion

The City is allocating funds to projects that are shovel ready as well as can completed during the fiscal year. For those projects that the committee didn't feel could be financed in time or had reservations about completing it on time we didn't recommend for funding.

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

<b>One Year Goals for the Number of Households to be Supported</b>
Homeless
Non-Homeless
Special-Needs
Total

**Table 58 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>
Rental Assistance
The Production of New Units
Rehab of Existing Units
Acquisition of Existing Units
Total

**Table 59 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The Lowell Housing Authority (LHA), founded in 1937, is the first public housing authority in Massachusetts, and one of the largest in the state with a Federal Public Housing Portfolio consisting of 1,611 units. Out of the 1,611 units, approximately 85% were constructed more than 65 years ago throughout our community. The LHA's primary mission is to provide safe, decent, and sanitary housing for low to moderate income residents in the City of Lowell.

Due to the rising cost of building materials, building envelope repairs, elevators requiring upgrades or total replacement, underground utility infrastructure upgrades and the critical aging infrastructure within our portfolio has proven to be a challenge for our agency.

Currently, the level of funding resources received is not sufficient to maintain the properties within their portfolio. Many of our vacant units require extensive repairs before the units can be re-occupied.

To

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

Lowell Housing Authority submitted their 5-year capital needs plan to HUD. LHA is in the planning stages to repair 85 units over the next year to make them habitable for the next tenant. The city is currently not planning on funding any projects using entitlement funds in the coming year. Some HOME funds might be committed to a new rental housing development that is going to be developed by a for-profit developer on behalf of LHA. Some of the NRSA funds will be used for projects that can be used residents in the North Common Village Complex.

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

The Lowell Housing Authority promotes homeownership for our Section 8 Voucher and Public Housing Program Residents by offering the Family Self-Sufficiency Program.

The FSS Program offers residents who qualify education and training in the following areas:

1. Financial Management Incentives: Offering the resident the opportunity to escrow their earned income as a savings tool towards homeownership.
2. Credit Score Building
3. Access to daycare: Offered to residents who are furthering their education or employed.
4. Financial Education

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

LHA is not designated as a troubled PHA

**Discussion**

Given the lack of funds to adequately address all of their needs LHA will be prioritizing capital needs that are part of their 5-year plan starting in FY25. On the city's end the city is still in constant communication with them to see which project we could possibly fund or assist them to find other funding sources.

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

### **Introduction**

The City of Lowell recognizes that in order to end homelessness a variety of methods should address the multiple causes and factors that lead to homelessness. As such, we are working with a variety of stakeholders to ensure that are taking the steps necessary to meet the needs of housing insecure households. Some steps include performing street outreach, providing funding for homeless prevention and homeless shelters, and having monthly committee meetings. Through these steps we hope to gain a greater understanding of the issues faced by housing insecure households.

### **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 currently has a homeless task force that meets every Friday to conduct outreach to unsheltered and homeless individuals. This task force consists of Lowell Police Department, Lowell Health Department, Vinfen a health and human services organization, Eliot Church, and Lowell Transitional Living Center. The city does a case conference after the outreach efforts to try to obtain services for this population.

The city also plans to fund projects that provide emergency shelter to homeless persons, projects that provide street outreach through basic emergency services, triage and connections to resources; and projects that provide homeless prevention by helping extremely low income at risk of homelessness pay rental arrears.

#### **Addressing the emergency shelter and transitional housing needs of homeless persons**

The city's primary means to address the needs of this population is through two city led committees: Hunger and Homeless Commission and service providers meetings. While the city does not do case conferences during these meetings, the meetings are instrumental to providing information about resources to all the services providers in the community. All of the non-profits that operate transitional living and homeless shelters are on this committee. During many of these meetings, state officials from different social service funded programs provide program updates. Additionally, one local non-profit operates a weekly meeting discussing the social service needs of newly arrived migrants and/or transferred from the state shelter system to a centralized location. As mentioned above the city also plans to fund projects that provide emergency shelter to homeless persons.

#### **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**

Homeless persons assisted by local emergency shelters are provided a case manager when they connect with a service provider. The case managers work with the household to obtain the resources necessary for them to live independently. These resources could include SNAP benefits, health insurance, referrals to mental health or substance abuse counselors, social security or SSDI benefits, applicants for affordable housing, etc. Additionally, some providers such as CTI and ESG funded providers have some funds set aside for households to receive start up costs to move into a unit. Depending on the service provider, some households may get case management services for more than a year.

**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 State of Massachusetts requires that the Department of Corrections do re-entry planning with inmates prior to release. The Middlesex Sheriff's office has a location in Lowell that is next to the homeless day center and near the individual homeless shelter. Similar to the previous response, each provider usually assigns a case manager to work with the household. The case managers often do an individual service plan that provides a comprehensive review of the household needs.

Homeless providers receiving ESG funds are provided a social worker who will refer them to social services agencies and other services needed to connect to and obtain housing. Also, homeless providers are connected to the coordinated entry system with the COC in order to assist finding housing. For at risk youth, CTI has a youth services department that assists with the unique socio-economic needs such as housing, and GED completion. Finally, UTEC works with formerly incarcerated youth and at-risk youth to provide employment training at UTEC's multiple social enterprises on site. They were recently awarding a grant to assist with youth experiencing homelessness. For the unsheltered population who don't seek assistance through the agencies, the City has a street outreach team that meets every Friday to connect the population with services.

CTI is also home to many federally and state funded social services. The organization runs a housing consumer education center which provides training in housing searches, fair housing, and provides state funded homeless prevention funds. If provided a case manager, they also work with them to apply for other social service needs.

The city has contacted the City of Cambridge to get information about projects funded by HOPWA. We have provided this information to various stakeholders for clients with HIV. Additionally, one of the

division's staff is on the board of directors of an organization in the area that works with HIV clients. Also, Lowell House, recently renamed Riverbend, who is also funded by ESG will be providing harm reduction strategies to people to reduce the prevalence of substance abuse disorders. The city will be working with local nonprofits to monitor the closing of Life Connections which ran a needle exchange program.

The planning department's relationship with the health and human services departments have been improving. The department has been in constant communication with various public and private agencies that address housing, health, social services, employment, education, or youth needs, to improve its understanding of the needs for the community.

The city made multiple visits to the senior center which houses the veterans service officers and the senior programs. The planning department community development division is in constant communication with the senior center leadership in order to understand what the needs are for this community. One of the main issues that has come up is the lack of housing and the cost of housing. Food insecurity is also a big issue with these populations. There are case managers on staff for the senior population and the VSO also provides case management services. If senior or those frail seniors need home modifications, they are referred to the state home modification loan program run by CTI or they can go on the waitlist for the HOME rehab program. At Lowell Housing Authority, resident service coordinators work with seniors, elderly and low-income families to get the assistance that they need.

Finally, Lowell is home to agencies that work with housing related issues. Middlesex Community College has a mediation service that works with landlord and tenant issues. Northeast Legal Aid provides free legal services for people to obtain federal financial assistance as well as provide attorney to assist with housing court issues.

## **Discussion**

We hope that the homeless assistance measures that we fund and take will make households more secure in their housing.

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

### **Introduction:**

The city of Lowell is actively seeking ways to develop more housing in the city. Constructing more housing either market rate or affordable housing will cause rents to become more affordable to the general public. Currently Lowell has a large amount of residents being cost burdened and a lack of subsidized housing units via vouchers or federal and/or state subsidies.

### **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**

The city should have its housing production plan adopted by the start of the program year. The policies suggested in this plan will help guide us on how to remove barriers to affordable housing construction. Additionally, the city enacted a new transit orientated development zoning near the intermodal transportation center. **The new zoning overlay districts** allow developers to build multi-family housing by right. At the same time, the City removed parking requirements from the zoning ordinances in the Downtown Mixed-Use District to reduce the burden of permitting and development costs associated with parking. This zoning change helps lower the financial loads of housing production and cut down the cost for housing in the area. **DPD also concluded a comprehensive master planning process that includes several recommendations that would reduce barriers to affordable housing construction, including a comprehensive zoning ordinance review, the creation of an affordable housing land trust, and the adoption of an ADU zoning ordinance.** While the city master plan advocated for ADUs to be built, the state enacted a new zoning law that allows ADU's to be built by right in any residential zone statewide.

### **Discussion:**

Housing affordability will continuously be an issue for the City of Lowell until we increase the amount of housing units to meet the demand within the community. Until that happens the city will continually promote ways to increase the housing stock.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

Overall, the cost of living in Middlesex County is extraordinary. According to MIT Living Wage Calculator, 2 parent 2 children household would need to earn \$171,094 in order to be able to afford all the necessities to live in the county. However, the median income for 80% of the AMI for the same population is only \$94,650. Therefore, many residents, including those that earn 100% of the AMI, are sacrificing something to live within the community/county.

### **Actions planned to address obstacles to meeting underserved needs**

The city revised their allocation process this year to funds less projects but provide more funding to organizations. We feel that providing awards of \$15,000 was not helping the residents who really need the services. In order to get a higher allocation, the city funded projects that collaborated with at least another organization. This allowed households to work with multiple organizations as well consolidate the stress and hassle of going to multiple organizations to submit the same paperwork and different regulations. By giving these organizations \$50,000 awards will reduce the administrative hassle by multiple organizations to provide documentation.

### **Actions planned to foster and maintain affordable housing**

The city has lowered the parking requirements to foster more affordable housing development. The city is also working to CHDO's to develop more housing. Funding is also going to the PHA to assist them in providing funding for non-housing housing projects so they can use that funding to maintain safe and affordable housing. The city also produced a housing production plan that will hopefully increase the affordable and market rate housing stock within the city.

### **Actions planned to reduce lead-based paint hazards**

Through it HOME rehab program the city will required to test and remediate lead hazards in pre-1978 housing using HOME funding, While the city does not have lead hazard control grant funds the city is able to refer clients to try to get access to state funds through MassHousing Get the Lead Out program. The city has a local lender that is able to process the MassHousing GTLO mortgages.

### **Actions planned to reduce the number of poverty-level families**

The is developing a NRSA that will focus on economic development issues such as skills training and business ownership. The city is also focusing on 3 general areas that were mentioned as being the highest need: quality of life (reducing the cost of living), food insecurity and programs to special populations, i.e. seniors, homeless, reentry programs, domestic violence survivors.

We will also continue to listen to provider input via committees and meeting face to face to really gain a

sense of the issues that are affecting low- and moderate-income households. The city is also making a concerted effort to reduce the silos that allowed information to sit with only with one department. Enhancing communication amongst departments allows us to gain a greater understanding of what is possible to fund under ESG and CDBG.

### **Actions planned to develop institutional structure**

The city has revised their policies and procedures for both ESG and community development. As a result, the city will be providing training to all grantees during the summer. This training will ensure that current and new grantees to ensure that they are able to they are able to comply with federal regulations. Additionally, during routine monitorings the city will be providing technical assistance to grantees who need more assistance to be able to comply with program rules.

The department has taking great lengths to increase stakeholders' knowledge of program rules and regulations. In order to enhance their knowledge, the city provides at least info session to let stakeholders know of the federal requirements. The department does this by requiring all applicants to attend a mandatory info session to understand the regulations prior to applying. Once the applicant is awarded funds the city also requires them to attend an orientation held late spring early summer to go over the same rules again. For public facility projects, the city requires a pre-contracting meeting with the project management team and the vendor. At this meeting the department goes over the following regulations Davis Bacon, Section 3, and BABA.

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

The city will continue to be a part of the hunger and homeless commission and service provider meetings. These meetings are led by the Director of Homeless Initiatives and are attended by state, local, and non-profit leaders. The Community Development department will also take part in the housing task force that will be run by the Greater Lowell Health Alliance. One of the goals of this new task force is look for ways to alleviate the negatives impacts of housing insecurity as it relates to a social determinant of health.

### **Discussion:**

The city will continue to be a part of the hunger and homeless commission and service provider meetings. These meetings are led by the Director of Homeless Initiatives and are attended by state, local, and non-profit leaders. The Community Development department will also take part in the housing task force that will be run by the Greater Lowell Health Alliance. One of the goals of this new task force is look for ways to alleviate the negatives impacts of housing insecurity as it relates to a social determinant of health.

## Program Specific Requirements

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

#### Introduction:

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(I)(1)

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

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

#### 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(I)(2)

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

The City of Lowell does not intend to use other forms of investment beyond those identified in Section 92.205. The City does plan on continuing their HOME rehab program. All rehab projects

using HOME funds there is a 5-year affordable housing restriction placed on the unit. If sold, prior to the 5-year period, the resale provisions apply. However, after the 5-year period, the homeowner is responsible for paying back the city the full amount of assistance after they transfer ownership of the property.

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 does not intend on utilizing a resale restriction for homebuyer activities in this fiscal year, however as required in the following cases: Resale provisions shall be required when HOME funds are provided in the form of a development subsidy and provided as a direct subsidy to the homebuyer.

The recapture option allows the City to recapture the entire HOME subsidy, subject to net proceeds, if the HOME recipient decides to sell the unit. The homebuyer may sell the property to any willing buyer at market price after the affordability period. The homebuyer may sell the property during the affordability period to an income eligible buyer, subject to the terms of the written agreement. Recapture of the HOME funds when sufficient equity does not exist to repay the HOME funds entirely is based on the ratio of the HOME subsidy to the sum of the homeowner's investment (including down payment and any capital improvement investment made by the owner since purchase), plus the HOME subsidy:

$$\text{HOME Subsidy} / (\text{HOME Subsidy} + \text{Homeowner Investment}) \times \text{Net Proceeds} = \text{HOME Recapture Amount.}$$
 Repayments of recaptured funds shall be remitted directly to the City to be utilized for HOME eligible activities only.

All HOME-assisted units "designated as affordable units" shall meet the following criteria: The new purchaser must be low income, meeting the HOME Program definition, and occupy the property as the family's principal residence. The sales price must not exceed 43% debt to income backend ratio to be considered "affordable" to the new purchaser and not exceed the 95% of the area purchase price as provided by HUD.

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 City will use a deed restriction to ensure the resale of the homeownership unit to a low-income eligible buyer during the affordability period and provide a "Fair Return on Investment" to the owner. The sales price shall equal the sum of (v) the cost of the appraisal (w) the purchase price paid by the Owner, (y) the documented total cost of capital improvements made by the Owner, which

costs shall be subject to approval by the City, in their sole discretion, at the time of the sale or transfer, excise taxes incurred by the Owner in connection with the sale of the Property and (z) a return on the Owner's investment equal to the product of (i) the sum of the Owner's original Down payment plus one half of the aggregate of regular principal payments made by the Owner on the allowable secured debt on the Property multiplied by (ii) a fraction, the numerator of which shall be the Price Index for the last month preceding the sale minus the Price Index for the month preceding the Owner's purchase of the Property and the denominator of which shall be the Price Index for the month preceding the Owner's purchase of the Property. The "Price Index" shall mean the "Consumer Index for Urban Wage Earners and Clerical Workers All Items (November 1982 = 100)" Published by the Bureau of Labor Statistics of the United States Department of Labor or any comparable successor or substitute index designated by the City appropriately adjusted. In the event the Price Index ceases to use the November 1982 Index of 100 as the basis of calculation or if a substantial change is made in the terms or number of items contained in the Price Index, then the Price Index shall be adjusted to the figure that would have been arrived at had the manner of computing the Price Index in effect at the date of this Deed Rider not been changed.

#### **Homeownership units using recapture provisions**

The City requires that each borrower sign a Mortgage, Promissory Note, and HOME Written Agreement. These documents provide safeguards to ensure that the borrower remains in compliance with the terms and conditions included in those documents. Pursuant to 24 CFR 94.254(a)(ii), the City requires that the HOME funds be recaptured if the housing does not meet HUD's definition of homeownership. The borrower of HOME funds from the City must continue to occupy the Property as their principal place of residence for the duration of the period of affordability. If all or part of the Property or any interest in it is sold, rented, refinanced, conveyed or transferred (or if a beneficial interest in Borrower is sold, rented, refinanced, conveyed, transferred and Borrower is not a natural person), the loan is due and payable along with any accrued interest.

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 of Lowell does not intend to use other forms of investment beyond those identified in Section 92.205. The city does plan on continuing their HOME rehab program. All rehab projects using HOME funds there is a 5-year affordable housing restriction placed on the unit. If sold, prior to the 5-year period, the resale provisions apply. However, after the 5-year period, the homeowner is responsible for paying back the city the full amount of assistance after they transfer ownership of the property.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with

special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

City of Lowell does not intend to have a TBRA program

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

City of Lowell does not intend to have a TBRA program

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

n/a

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

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

see attachment

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

The State of Massachusetts Executive Office of Housing and Livable Communities (EOHLC) administers and manages the Balance of State CoC. The MA BoS CoC uses VESTA as its standard Homeless Management Information System (HMIS) for CoC subrecipients and program beneficiaries. The State EOHLC also sets the centralized coordinated intake requirements and standards for the Balance of State CoC region. The coordinated entry and HMIS intake process assists with better targeting and serving the needs of homeless persons among providers.

The BoS requires CoC Centralized coordinated intake for homeless persons, meaning that the coordinated entry requirements also apply to subrecipients for the following ESG categories: Emergency Shelter, Street Outreach, and Rapid Rehousing. (These categories provide services to homeless populations). ESG beneficiaries are required to be processed through the standard

centralized or coordinated assessment system, pursuant to HUD regulations, 24 CFR 576.400(d). Therefore, the City of Lowell DPD requires ESG providers of Street Outreach, Emergency Shelter, and Rapid Re-housing to use the established CoC Coordinated entry process for homeless persons.

The use of HMIS is also required for all ESG subrecipients with the exception is Victim Service Providers who are allowed to use a comparable alternative database and who must not directly input data into HMIS. VSP providers use a separate database from the CoC. However, VSP providers still participate in coordinated entry but don't provide identifying information. Otherwise, in accordance with HMIS policy for non VSP providers, data must be logged on services provided, referrals, and discharges.

As previously mentioned, the regional CoC HMIS is VESTA. The City of Lowell also follows the coordinated entry process that the Balance of State uses. The Balance of State Coordinated Entry System that the City of Lowell also uses is summarized below. See the rest of CE attachment for remainder of answer.

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).

The city implemented a competitive Request for Proposal (RFP) process that began in the fall that was open to all organizations. Applications were due in December. The Planning department reviewed the applications to determine if they were eligible under ESG guidelines. Four of the six of the applications that were received were eligible. The other two that were not eligible were missing a substantial amount of information. From that point, eligible applications were forwarded to the project review committee which consisted of two people from DPD, the Director of Homeless Initiatives, Public Health Director, and two staff members from the State EOHLC, who is also part of the Balance of State COC. Each team member was asked to fill out a score sheet. All of the score sheets were provided to DPD and placed in a spreadsheet. This spreadsheet was reviewed by the committee and decisions were made based on these scores.

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.

During the past 24-25 program year, the city reached out to all of its ESG subrecipients and more agencies to see if there was interest in having a formerly homeless person participate in reviewing the next year's ESG RFP scoring matrix and program policies manual. One person volunteered and provided some feedback on scoring matrix. The City intends to follow up to involve them in more planning and policy decision regarding homelessness at the City and try to include more formerly homeless persons.

5. Describe performance standards for evaluating ESG.

Each grantee is required to submit quarterly reports to the office. The city also performs desk monitoring of those reports during the grant cycle year and at the end of the year in preparation of the CAPER. The City reviews these during on-site monitoring. During the program year and or during monitoring if an agency is at risk of or does not meeting established outcomes they are provided feedback.

The city is looking to be more deliberate during the consolidated planning process which is currently taking place to review what type of projects will be funded for the next 5 years.

**Appendix - Alternate/Local Data Sources**

<b>1</b>	<b>Data Source Name</b> NA-10 Housing Needs Assessment: Children
	<b>List the name of the organization or individual who originated the data set.</b> 2018 American Community Survey
	<b>Provide a brief summary of the data set.</b> MEDIAN HOUSEHOLD INCOME THE PAST 12 MONTHS (IN inflation AJUSTED DOLLARS) BY TENURE AND OCCUPANCY
	<b>What was the purpose for developing this data set?</b> To determine occupancy of children in a household by housing tenure
	<b>Provide the year (and optionally month, or month and day) for when the data was collected.</b> 2018 ACS Data
	<b>Briefly describe the methodology for the data collection.</b> survey of percentage of households
	<b>Describe the total population from which the sample was taken.</b> n/a

	<p><b>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</b></p> <p>n/a</p>
<b>2</b>	<p><b>Data Source Name</b></p> <p>2020 PIT COUNT</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>City of Lowell, COC</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>2020 point in Time Count</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>n/a</p>
	<p><b>Provide the year (and optionally month, or month and day) for when the data was collected.</b></p> <p>n/a</p>
	<p><b>Briefly describe the methodology for the data collection.</b></p> <p>n/a</p>
	<p><b>Describe the total population from which the sample was taken.</b></p> <p>n/a</p>
	<p><b>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</b></p> <p>n/a</p>
<b>3</b>	<p><b>Data Source Name</b></p> <p>2020 HIC COUNT</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>n/a</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>n/a</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>n/a</p>
	<p><b>Provide the year (and optionally month, or month and day) for when the data was collected.</b></p> <p>n/a</p>
	<p><b>Briefly describe the methodology for the data collection.</b></p> <p>n/a</p>

	<b>Describe the total population from which the sample was taken.</b> n/a
	<b>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</b> n/a