

LYNN



CONSOLIDATED PLAN

FOR HOUSING, ECONOMIC & COMMUNITY
DEVELOPMENT

FEDERAL FISCAL YEARS 2010 - 2014

Parts I & II

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**City of Lynn, Massachusetts
Consolidated Plan
For
Housing, Economic and Community Development
Federal Fiscal Years 2010-2014
City Fiscal Years 2011-2015**

Table of Contents

PART I: CONSOLIDATED PLAN

1.	INTRODUCTION	1
2.	EXECUTIVE SUMMARY	6
3.	PROGRAM ADMINISTRATION	11
4.	CITIZEN INVOLVEMENT IN THE PLAN	13
5.	PROGRAM RESOURCES.....	15
6.	PROFILE OF THE LYNN COMMUNITY	17
7.	STRATEGIC PLAN FOR HOUSING	24
	Housing Market Analysis	24
	Housing Submarket Analysis.....	35
	Lead-Based Paint Hazards	41
	Public Housing Needs and Strategies	42
	Neighborhood Revitalization Strategy Area.....	47
	Barriers to Affordable Housing	48
	Anti-Poverty Strategy	48
	Strategic Plan Framework for Housing.....	49
	Priority Housing Needs.....	52
8.	STRATEGIC PLAN FOR ECONOMIC AND COMMUNITY DEVELOPMENT.....	57
	Economic Development Studies	57
	Economic Development Needs.....	59
	Economic Development Strategy	64
	Infrastructure and Community Facility Needs.....	67
	Infrastructure and Community Facility Strategy	68
	Public Services Needs.....	68
	Public Services Strategy	69

9.	STRATEGIC PLAN FOR HOMELESSNESS AND SPECIAL NEEDS.....	76
	Homeless Needs.....	77
	Housing and Shelter Inventory	79
	Homeless Strategy	82
	Chronic Homelessness.....	88
	Discharge Coordination Policy.....	89
	Special Needs (Non-Homeless) Populations	91
	Priority Needs and Strategy	92
10.	PERFORMANCE MONITORING	96
11.	ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING.....	97
12.	CITIZEN PARTICIPATION PLAN	113

PART II: ANNUAL ACTION PLAN FOR CITY FISCAL YEAR 2011

PART III: CONSOLIDATED PLAN SUPPORTING DOCUMENTS (under separate cover)

1. WATERFRONT MASTER PLAN REPORT
2. MARKET STREET VISION PLAN
3. WASHINGTON STREET GATEWAY PLAN
4. ECONOMIC DEVELOPMENT STRATEGY – 2005
5. OPEN SPACE AND RECREATION PLAN - 2005
6. LHAND PHA FIVE YEAR/ANNUAL PLAN
7. HIGH ROCK MASTER PLAN
8. CITY OF LYNN STAKEHOLDERS

1. INTRODUCTION

Background

The City of Lynn's Consolidated Plan for Housing and Community Development for City Fiscal Years 2011-2015 is designed to provide a framework and strategy for future actions and investments and to meet federal funding requirements related to four (4) major formula programs:

- Community Development Block Grant (CDBG);
- HOME Investment Partnerships (HOME);
- Emergency Solutions Grant (ESG—formerly the Emergency Shelter Grant); and
- Housing Opportunities for People with AIDS (HOPWA) programs.

Preparation of a Consolidated Plan is required at least every five (5) years. The City's last Consolidated Plan was developed in the year 2005. Part I of the new Consolidated Plan provides a framework and strategic plan for resource allocation and program activities over the five year period from July 1, 2010 through June 30, 2015 (also referred to as City Fiscal Years 2011 through 2015). Part II includes the required Annual Action Plan for the period beginning July 1, 2010. The Consolidated Plan supporting documents are included in Part III.

The Consolidated Plan, including the Annual Action Plan, was designed in accordance with the US Department of Housing and Urban Development's (HUD) Final Rule published January 5, 1995 and updated through February 6, 2006. As such, this document meets the requirements of the Cranston-Gonzalez National Affordable Housing Act of 1990 and the document submission requirements of the four formula grant programs: CDBG, HOME, ESG and HOPWA.

Community Development Block Grant Program

Community Development Block Grant (CDBG) funding represents the largest share of the federal formula programs noted above. In Fiscal Year 2011, the City expects to receive a total of \$4.3 million under the formula programs of which \$2.75 million (64%) are CDBG funds. HUD provides annual CDBG grants to entitlement communities to carry out a wide range of community development activities directed toward revitalizing neighborhoods, economic development, and providing improved community facilities and services.

Entitlement communities such as Lynn develop their own programs and funding priorities. However, maximum feasible priority must be given to activities which benefit low- and moderate-income persons. The City must certify that at least 70% of all funds expended benefit low- and moderate-income households. A grantee may also carry out activities which aid in the prevention or elimination of slums or blight. Additionally, grantees may fund activities when the grantee certifies that the activities meet other community development needs having a particular

urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community where other financial resources are not available to meet such needs. CDBG funds may not be used for activities which do not meet these broad national objectives.

HUD determines the amount of each entitlement grant by a statutory dual formula which uses several objective measures of community needs, including the extent of poverty, population, housing overcrowding, age of housing and population growth lag in relationship to other metropolitan areas. As discussed in this Plan, the level of CDBG funding provided to Lynn has seriously declined when factoring in inflation.

CDBG funds may be used for activities which include, but are not limited to:

- Acquisition of real property;
- Relocation and demolition;
- Rehabilitation of residential and non-residential structures;
- Construction of public facilities and improvements, such as water and sewer facilities, streets, neighborhood centers, and the conversion of school buildings for eligible purposes;
- Public services, within certain limits;
- Activities relating to energy conservation and renewable energy resources; and provision of assistance to profit-motivated businesses to carry out economic development and job creation/retention activities.

Data Sources

Lynn's Consolidated Plan incorporates a wide array of data sources. Data from the 2010 Census is not currently available; therefore, the City used a combination of 2000 Census data, limited updates provided by HUD and the US Census primarily for the period 2006-2008, along with 2009 projections. Several of the sources used for this plan, therefore, are estimated numbers. *It is important to note that some data including population totals varies among different sources as these sources rely on different sampling methods and universes.* The various data sources and estimates are the most recent, best data available; however, none of them fully reflect the impact that the recession has had on the City and its residents. A list of the major data sources and explanations includes:

- **U.S. Census Data from 1990 and 2000** – Census data was used to show trends with current data and to populate some of the HUD required tables.
- **American Community Survey (ACS)** – The ACS is a statistical survey conducted by the US Census Bureau to provide more timely and relevant information on both a yearly (for populations of 65,000 or more) and three-year estimated (for populations of 20,000

or more) basis. The first ACS was implemented in 2005. This plan uses data from the 2006-2008 ACS, which is an estimate over the three year time period; however, data is available only at the citywide level. A three-year estimate is generally considered to be more accurate than a single year estimate. The ACS will be replacing the long form of the Decennial Census in 2010 and the Census Bureau will begin releasing yearly, 3-year and 5-year (for the smallest communities) estimates.

- **Claritas Updated Data and Projections** – Nielsen Claritas is a market research and data firm that provides updated demographic information for the current year and for five-year projections. This report includes data purchased from Claritas showing 2009 estimated demographics and 2014 projections. Care should be taken when comparing Claritas data to Census, ACS and other data sources as numbers may be different due to estimations.
- **Warren Group** – The Warren Group provides real estate market data. This report used Warren Group data to examine trends in residential sales.
- **State and Federal Agencies** - This plan draws from data compiled by both state and federal agencies. These agencies include: the US Department of Housing and Urban Development (HUD), the United States Post Office (USPS) Vacancy Data, the Massachusetts Department of Housing and Community Development (DHCD), the Massachusetts Executive Office of Labor and Workforce Development (EOLWD) and the Massachusetts Department of Health and Human Services (HHS).
- **Comprehensive Housing Affordability Strategy (CHAS)** – HUD offers special Census tabulations to assist communities in their consolidated planning. These tabulations detail housing needs and the severity of housing problems for different segments of the population and are not available in regular census products. In 2009, HUD released new CHAS data based on the 2007 American Community Survey. This is available for communities with a population of 65,000 or more. This report was able to take advantage of this more recent data for the City of Lynn. It is important to note that while the source is cited as 2009 CHAS data, it is based on 2007 estimates of the ACS. Note also that both 2000 Census data and the updated CHAS tabulations are used in this document.
- **Lynn Agencies** – Local data including capital/infrastructure needs, permitting activity and other relevant information was compiled from Lynn Housing and Neighborhood Development (LHAND), Lynn Police Department, Lynn Fire Department, Lynn School Department, Lynn Inspectional Services and the Lynn Assessor’s Office.
- **Neighborhood Stabilization Program** – The City (LHAND) received a \$1 million CDBG-NSP direct assistance grant from the Commonwealth of Massachusetts. Data from this application was used to describe the City’s foreclosure issues and strategies.
- **Massachusetts Department of Revenue** – Information was obtained from the Division of Local Services.

- **Master Plans Commissioned by City** – Recommendations and strategies from the City’s Open Space and Recreation Plan, Waterfront Master Plan, Washington Street Gateway Plan, Market Street Gateway Plan and High Rock Master Plan are included. These studies are also incorporated into Part III of the Consolidated Plan.
- **Essex County AIDS Housing Needs Assessment** - Information was used from this report prepared in 2006 by the AIDS Housing Corporation.
- **Citizen Input** - Information was obtained from surveys, meetings, site visits and focus groups involving residents, businesses, public agencies, public officials, and social service agencies.
- **Housing Discrimination** - Data on housing discrimination was obtained from the Massachusetts Commission Against Discrimination, HUD and other sources.

Organization of the Consolidated Plan

Part I of the Consolidated Plan describes the five year need, priorities and strategies for economic development, housing, community development, public services and homelessness prevention. It includes the following chapters:

1. **Introduction** orients the reader to the Consolidated Plan document and provides important background information.
2. **Executive Summary** provides an overview of the City’s needs and five year strategy for housing and community development.
3. **Program Administration** summarizes the City’s approach to planning and implementing CDBG, HOME, ESG and HOPWA program activities.
4. **Citizen Involvement in the Plan** describes the extensive public participation efforts undertaken to ensure wide ranging input and review.
5. **Program Resources** provides a summary of formula program funding received and obligated by the City since Fiscal Year 2005 and those projected for Fiscal Year 2011.
6. **Profile of the Lynn Community** provides a brief summary of key demographic, economic and housing characteristics.
7. **Strategic Plan for Housing** describes the City’s housing needs, resources, priorities and strategies. It incorporates an analysis of the overall housing market, lead based paint needs, public housing needs and strategies, antipoverty strategy and a discussion of barriers to affordable housing.
8. **Strategic Plan for Economic and Community Development** describes the City’s non-housing economic and community development needs, resources, priorities and strategies

including a discussion of key economic development target areas. It includes information on economic development, infrastructure, community facilities, public services and other non-housing community development needs.

9. **Strategic Plan for Homelessness and Special Needs Populations** describes the City's needs, resources, priorities and strategies to prevent homelessness and provide permanent housing for homeless and other special needs populations including seniors, people with disabilities and HIV/AIDS. This chapter includes required HUD Tables. The strategy included in this chapter builds directly on the Continuum of Care Plan developed by the Lynn PACT collaborative.
10. **Performance Monitoring** includes information on the City's program monitoring and oversight activities.
11. **Analysis of Impediments to Fair Housing** incorporates an updated analysis of Lynn fair housing issues and strategies.
12. **Citizen Participation Plan** is the City's approved plan describing the formal public review and participation activities to be undertaken as part of the Consolidated Plan and Annual Action Plan initiatives.

Part II of the Consolidated Plan describes the City's Annual Action Plan for the one-year period beginning July 1, 2010. It includes an analysis of funding sources, annual needs and objectives, and a summary of projects to be funded through CDBG, HOME, ESG and HOPWA. Program guidelines and descriptions are included for ongoing housing, economic and community development programs.

Part III of the Consolidated Plan includes copies of key studies and other documents related to economic development and housing upon which the five-year strategic plan is based.

The Consolidated Plan document was prepared and published in June 2010 by the City of Lynn Office of Economic and Community Development and the Lynn Housing Authority and Neighborhood Development.

2. EXECUTIVE SUMMARY

The City of Lynn has developed this Consolidated Plan through an ongoing collaborative process involving citizens and stakeholders from throughout the community. It defines the City's needs, priorities and strategic plan for housing, economic and community development for the five-year period beginning July 1, 2010. Preparation of a Consolidated Plan is a requirement for receipt of federal funds including the following programs: Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Housing Opportunities for Persons with AIDS (HOPWA) and Emergency Solutions Grant (ESG, formerly known as the Emergency Shelter Grant program).

The City of Lynn is the grantee for the CDBG, HOME, HOPWA and ESG programs. Planning and administration of all non-housing activities including economic development, community development, public services, infrastructure and community facilities is the responsibility of the City's Office of Economic and Community Development (LOECD). LOECD directly administers economic and community development programs and provides oversight and monitoring for sub-recipients of non-housing funds. Planning and administration of all housing related activities funded through the formula programs is the responsibility of the Lynn Housing Authority and Neighborhood Development (LHAND). LHAND, as a sub-recipient, directly administers housing programs and provides oversight and monitoring for other sub-recipients of housing funds.

The Consolidated Plan provides a strategic plan framework in support of the three broad statutory program goals:

- **Expand economic opportunities.** The Plan identifies needs and strategies to promote economic development including retaining existing jobs and creating new jobs for low and moderate income households; retaining existing businesses, encouraging business expansion, and marketing Lynn to new businesses; expanding homeownership opportunities for low and moderate income households; promoting economic self-sufficiency among disadvantaged persons; and, reducing barriers to full economic and civic participation by Lynn's increasingly diverse ethnic and cultural groups.
- **Provide decent housing.** The Plan identifies needs and strategies for retaining existing affordable housing including public housing and other subsidized housing resources; expanding the supply of affordable housing for low and moderate income households; preventing homelessness and assisting homeless persons to obtain affordable housing; increasing the supply of supportive housing for persons with special needs; reducing hazards from lead based paint; and, eliminating barriers to fair housing.
- **Provide a suitable and safe living environment.** The Plan identifies needs and strategies for upgrading and revitalizing the City's urban core including the Downtown, Washington Street and Market Street Gateways; developing the Waterfront area; reducing concentrations of poverty and economic isolation; reducing crime; improving the conditions of streets, water supply, community facilities, playgrounds and other

infrastructure components; providing critical supportive services for seniors, youth, and people with special needs; and, encouraging housing, commercial and other investments.

Development of the Consolidated Plan, including the master plan initiatives referenced herein, has involved hundreds of citizens, business owners, non-profit agencies and government agencies.

For the upcoming City fiscal year beginning July 1, 2010, the City projects that a total of approximately \$4.3 million in federal funds will be received for the CDBG, HOME, HOPWA and ESG programs. The level of need within the community dramatically exceeds available funding; thus, the Consolidated Plan provides a framework for program and funding priorities.

As this document is being published, the City continues to experience a protracted recession that is having a significant negative impact on the housing market, employment levels, poverty rates, municipal revenues and other key indicators. The needs defined in the Consolidated Plan are based on currently available data gathered from a wide array of sources including Census projections; however, updated information from the 2010 US Census is not yet available. Thus, the full impact of the recession may not be adequately captured by existing data.

Strategic Objectives: Economic and Community Development

Within the context of limited resources and a sluggish economy, the City will continue to focus on priority economic development initiatives in order to retain and expand the number of local jobs, retain and expand the number of local businesses, and expand the City's revenue base. Priority areas over the next several years include implementation of the Waterfront Master Plan, the Washington Street Gateway and the Market Street Gateway. Wherever feasible, these initiatives will be coordinated with housing and neighborhood revitalization efforts. Major strategic objectives for economic and community development includes:

- Retain and expand existing businesses and jobs
- Create new businesses and jobs
- Continue efforts to support Downtown revitalization
- Encourage Lynnway/Waterfront revitalization including implementation of the Waterfront Master Plan
- Implement key master plan strategies including the Washington Street Gateway, Market Street Gateway, High Rock, and Open Space and Recreation Plan
- Support development in identified Opportunity Zones
- Maximize private sector leverage and property tax revenue potential from public investments

- Increase economic self sufficiency and income levels among low and moderate income residents including efforts to promote financial stability
- Enhance infrastructure investments to support economic development and housing objectives
- Facilitate educational attainment and healthy development of Lynn youth including efforts to reduce gang involvement through programs such as YouthBuild
- Promote safe neighborhoods
- Support community diversity
- Promote access to health care services for seniors, special needs households and all citizens

Strategic Objectives: Housing

The City intends to continue its strategic approach to housing programs emphasizing preservation of existing resources and revitalization of the City's urban core. Efforts to address the foreclosure crisis will be expanded. Resources will be focused on the areas of highest foreclosure rates as defined in the City's Neighborhood Stabilization Program. Through Healthy Homes and related efforts, the City will work to improve the environment and health of low-income households. Expanded efforts to provide housing and supportive services for returning veterans will be implemented. An increased focus on energy conservation and Green technologies will be implemented. Housing resources and programs will continue to be coordinated with economic development initiatives so as to maximize the direct economic benefits to Lynn residents. Major strategic objectives for affordable housing and the public housing program include:

- Preserve existing affordable homeownership and rental opportunities for low and moderate income households
- Respond aggressively to prevent foreclosures and to address the negative impacts of foreclosures on neighborhoods and low and moderate-income households
- Promote sustainability, Green technologies and energy conservation initiatives
- Expand the supply of affordable homeownership for low and moderate income households

- Secure funding to support revitalization and preservation of existing public housing resources including Curwin Circle and state-assisted developments
- Assist first time homebuyers through downpayment assistance, IDA and other equity building activities
- Coordinate housing activities with other public sector economic development and infrastructure investments particularly in high impact areas such as the Waterfront, Downtown, Market Street and Washington Street
- Coordinate housing initiatives with economic self-sufficiency and supportive service programs
- Expand housing and supportive service opportunities for veterans

Strategic Objectives: Homelessness and Special Needs Populations

The City will continue to work with the Lynn PACT Continuum of Care to provide a range of housing and supportive services for homeless and special needs populations. The City’s strategy will evolve as needed to respond to the requirements and opportunities of the HEARTH Act including a continued emphasis on “housing first” models. Priority efforts will be made to expand the supply of permanent supportive housing for families. The City will seek VASH vouchers and other resources to support the housing and service needs of veterans. Ongoing efforts will continue and be expanded to end chronic homelessness, provide emergency and transitional housing services to needy families and individuals, and to address the needs of special needs populations including those with HIV/AIDS and seniors. Major strategic objectives for the homeless and special needs population include:

- Conform to HEARTH Act and other new federal requirements
- Promote expansion of “housing first” models
- Address need to expand availability of permanent supportive housing for families
- Reduce and ultimately end chronic homelessness
- Create additional permanent housing, job training, employment and supportive service opportunities for the chronic and other homeless populations

- Expand housing and supportive service opportunities for veterans through VASH vouchers and other available resources
- Provide emergency and transitional housing and services
- Facilitate access to housing, health care, nutrition and other supportive services to persons with HIV/AIDS
- Facilitate access by seniors to home care, nutrition, housing, transportation, recreational and medical services
- Facilitate access to emergency services, counseling, support and permanent housing services to abused women and their children
- Promote access to housing, jobs and services by Lynn's multi-linguistic populations

3. PROGRAM ADMINISTRATION

Lead Agencies

To promote accountability and sound administration, the City has organized its program administration activities as follows:

- The City of Lynn is the grantee for the CDBG, HOME, HOPWA and ESG programs. Planning and administration of all non-housing activities including *economic development, community development, public services, infrastructure and community facilities* is the responsibility of the City's **Office of Economic and Community Development (LOECD)**. LOECD directly administers economic and community development programs and provides oversight and monitoring for sub-recipients of non-housing funds.
- Planning and administration of all *housing related* activities funded through the formula programs is the responsibility of the **Lynn Housing Authority and Neighborhood Development (LHAND)**. LHAND, as a sub-recipient, directly administers housing programs and provides oversight and monitoring for other sub-recipients of housing funds. Also, LHAND is the Public Housing Authority for the City of Lynn, administering federal and state public housing, voucher and related programs.
- LOECD and LHAND collaborate in the development of the Consolidated Plan and all Annual Plans. On an ongoing basis, LOECD and LHAND staff meet to coordinate program planning and implementation activities and to ensure consistency in program monitoring and oversight.
- LOECD and LHAND coordinate all public participation activities to promote a high degree of public involvement and feedback on housing and community development initiatives.
- LOECD and LHAND staff members work as a team to accomplish the Consolidated Plan and Annual Plan activities. Staff members are highly qualified and receive periodic training to ensure that they remain current with regulatory requirements, best practices and housing and community development trends and issues.
- LOECD and LHAND regularly communicate with the HUD Field Office and other federal, state and local regulatory and funding resources to promote information sharing.

The administrative structure summarized above has been operational since July 1998, following the City and LHAND's execution of a Memorandum of Understanding. Subsequently, both agencies have been subject to periodic program and financial audits, none of which resulted in substantive findings related to administration of the CDBG, HOME, HOPWA and ESG programs. Also during this period, the LOECD and LHAND have been periodically cited for

best practices by HUD, the National Association of Housing and Redevelopment Officials and others.

Coordination of Housing, Economic and Community Development Activities

LOECD and LHAND staff members meet on a regular basis to plan and implement housing and community development activities. All formula program planning, implementation, oversight and monitoring are provided by LOECD and LHAND staff. Also, LHAND staff members meet regularly with members of the Lynn PACT to coordinate the City's efforts to address homelessness issues.

4. CITIZEN INVOLVEMENT IN THE PLAN

Lynn's Consolidated Plan for 2011-2015 provides a framework and strategy for housing, economic development and community development actions and investments over the next five years that builds on an existing foundation of many years of community involvement and planning. In addition to incorporating citizen involvement specific to this Plan, the strategies described herein incorporate community input from a wide range of ongoing planning processes and time-limited studies undertaken by the City.

To prepare the Consolidated Plan and Annual Action Plan, the City:

- *Consulted with public and private agencies* including business owners, major health and social service providers, housing providers including agencies providing services to homeless and at-risk households, organizations serving persons with AIDS and other special needs, state and regional agencies, and other citizens.
- *Convened focus groups and site visits* in the spring of 2010 to solicit input from vital stakeholders, identify and prioritize needs for the Lynn community, establish strategic goals and objectives for the next five years, and identify resources and activities to address community needs. A site tour for interested citizens, including Citizen's Advisory Board members and agency representatives, was held in June 2010 in order to view current projects and provide an opportunity for further discussion on Consolidated Plan needs and priorities. During the site tour, a survey on community priorities was conducted. Public Services focus group participants were asked to complete questionnaires summarizing their activities, as well as an assessment of priority, unmet needs over the next five years. Information gleaned from these activities was used to develop Consolidated Plan needs and priorities in the areas of public services, infrastructure and community facilities.
- *Prepared studies and Master Plans* – Hundreds of Lynn citizens, business owners and stakeholders have participated in one or more of the planning efforts sponsored by the City to prepare the City's Open Space and Recreation Plan, Waterfront Master Plan, Washington Street Gateway Plan, Market Street Gateway Plan and High Rock Master Plan.
- *Conducted a Downtown Charrette*. LOECD conducted an intensive two-day planning session involving planners, local businesses, government officials and community stakeholders to identify needs and strategies to support Downtown redevelopment. The results of the workshop were used to help prepare the economic development components of the Consolidated Plan.
- *Coordinated with the Lynn McKinney PACT collaborative to identify needs, priorities and strategies to address the City's homeless problems*. Lynn PACT (People Acting as a Collaborative Team) is a broad based collaborative of agencies working together to assist homeless persons to attain housing and achieve self-sufficiency. With the goal of

eliminating chronic homelessness, the partner agencies of Lynn PACT create, maintain, and build upon a community-wide inventory of housing and services for homeless individuals and families in the greater Lynn, Massachusetts area. Lynn PACT meets regularly to discuss the needs of homeless people in the city, to review existing programs, identify unmet needs, and implement strategies to fill the gaps. The homelessness strategies described in the Consolidated Plan incorporate the input of Lynn PACT member agencies.

- *Conducted outreach to housing agencies, multifamily owners, advocacy groups, and public enforcement bodies to assess issues and obstacles to fair housing in Lynn.* This information is summarized in the Analysis of Impediments to Fair Housing section of the Consolidated Plan.

To prepare its Annual Action Plan priorities, the City issued public notices and conducted outreach to solicit entitlement fund proposals. Proposals were reviewed, assessed and selected for funding consistent with HUD regulations and City policies.

Finally, the City has adopted a formal Citizen Participation Plan as required by HUD regulations, which is included at the end of the Consolidated Plan. Consistent with regulations and the Citizen Participation Plan, the City provided formal opportunities for public review and comment prior to finalizing the Consolidated Plan and Annual Action Plan. This included:

- The Citizen's Advisory Board is an eighteen member group appointed by the Mayor and City Council to advise the City on housing and community development issues. In March 2010 the Board, in cooperation with LOECD and LHAND, held a public hearing to review proposals for entitlement funds.
- During the planning process the City convened two public hearings to obtain citizen views and input regarding community needs and priorities. Approximately 80 Lynn residents attended the public hearing held in March 2010 at which 21 proposals for funding were presented.
- The City published legal notices and provided opportunities for public review and comment on the draft 2011-2015 Consolidated Plan and 2011 Annual Action Plan. A second public hearing with the Lynn City Council was held on July 13, 2010.

5. PROGRAM RESOURCES

Funding available from the CDBG, HOME, ESG and HOPWA programs are extremely limited in relation to the level of community need. The following table provides a summary of formula program funding received and obligated by the City since Fiscal Year 2005 and those projected for Fiscal Year 2011, which begins on July 1, 2010.

City of Lynn Entitlement Program Funds by Category

Category	Fiscal Year						
	2005	2006	2007	2008	2009	2010	2011
Total Allocation	\$4,288,828	\$4,346,759	\$4,003,288	\$4,003,221	\$3,901,936	\$4,069,979	\$4,306,793
CDBG Allocation	\$3,007,000	\$2,844,405	\$2,562,156	\$2,570,189	\$2,488,209	\$2,539,096	\$2,756,317
Economic Development	\$751,300	\$777,958	\$658,180	\$727,453	\$631,660	\$409,760	\$384,760
Community Facilities	\$366,355	\$329,570	\$302,543	\$310,605	\$190,479	\$535,784	\$743,170
Public Services	\$513,805	\$490,051	\$426,993	\$430,215	\$413,882	\$439,818	\$474,318
Housing Activities	\$591,540	\$498,881	\$512,531	\$444,038	\$497,642	\$507,819	\$496,137
Section 108 Repayment	\$365,500	\$304,861	\$302,487	\$293,995	\$289,579	\$276,632	\$271,845
Administration	\$418,500	\$443,084	\$359,422	\$363,883	\$464,967	\$369,283	\$386,087
HOME Allocation	\$1,169,968	\$1,076,375	\$1,014,723	\$1,010,533	\$976,987	\$1,088,234	\$1,084,120
ESG Allocation	\$111,860	\$109,979	\$109,409	\$110,499	\$110,740	\$110,783	\$111,328
HOPWA Allocation	\$0	\$316,000	\$317,000	\$312,000	\$326,000	\$331,866	\$355,028

While the total allocation for FY 2011 reflects a 5.8% increase over the FY 2010 funding amount, the overall need for housing, economic and community development resources in Lynn dwarfs available and projected federal funds. It should also be noted that total FY 2011 funding is less than the amount received in FY 2000 (\$4.317 million) - even without adjusting for ten years of inflation.

In light of ongoing federal budget constraints, it is not feasible to assume that the strategic objectives described in the Consolidated Plan can be achieved solely through public sector investments. Continuing to support and foster focused, community-wide partnerships involving citizens, business owners, developers, non-profit providers and government agencies will be a fundamental and essential component of the City's future strategy.

To the greatest extent feasible, the City will continue to use limited formula funds to leverage additional non-governmental resources. For example, public investments in economic development activities such as the Waterfront Master Plan are viewed as a major opportunity to

leverage substantial additional private sector investments that will increase jobs to low and moderate income households, expand the City's commercial and residential tax base and foster related investments in housing and other community facilities. Further, the City recognizes the need to enhance its focus on performance measures and outcomes as they relate to expenditures from the formula grant programs. Over the course of the five-year Consolidated Plan cycle, the City will continue to carefully monitor the performance of grantee agencies to ensure that measurable outcomes aligned to strategic objectives are reached.

6. PROFILE OF THE LYNN COMMUNITY

Lynn, Massachusetts is located ten miles north of Boston on the shores of the Atlantic Ocean. Encompassing 10.47 square miles, the City is racially and ethnically diverse with a 2009 estimated population of 86,491. While Lynn has numerous strengths including its waterfront location, proximity to transportation routes and relatively affordable housing stock, the City continues to struggle from decades of job losses and economic challenges which have intensified in the current economic recession. Lynn currently has a high unemployment rate, a high number of foreclosed properties, declining property values, and an inadequate commercial tax base, leaving an inadequate tax base to support many necessary public services. A brief summary of key data follows:

Population

- Lynn has experienced a decline in its population in recent years. Since 2000, the population has declined by an estimated 2.9% or 2,559 people. Some additional population decrease is projected over the next five years. Despite this trend, the Metropolitan Area Planning Council projected that the Greater Boston Metro area population will substantially increase through the year 2030, and that Lynn will be a “fast-grower” community.

**City of Lynn, MA
Selected Demographic Data**

	1980	1990	2000	2009 (est)	2014 (proj)
Population	78,471	81,245	89,050	86,491	85,270
% Change	--	3.5%	9.6%	-2.9%	-1.4%
Group Quarters	--	1,479	1,344	1,306	1305
% Change	--	--	-9.1%	-2.8%	-0.1%
Households	30,421	31,554	33,511	31,989	31,223
% Change	--	3.7%	6.2%	-4.5%	-2.4%
Avg. Household Size	--	2.53	2.62	2.66	--
% Change	--	--	3.6%	1.5%	
Families	--	20,120	21,033	20,007	19,492
% Change	--	--	4.5%	-4.9%	-2.6%

Source: US Census and Claritas, Inc.

- The 2009 estimated median age in Lynn is 36.23, up from 34.2 in 2000.
- While the percentage of elderly in the City has declined, elderly residents now comprise 12% of the total population and 18% of all household heads.

Race and Ethnicity

- Lynn houses a highly diverse population with a minority population of 42.6%, significantly higher than the statewide percentage of 17.3% (ACS 2006-2008 estimate). The long-term trend has been towards a more diverse population with substantial increases in the numbers and percentages of minority and Hispanic residents.
- Lynn’s African-American population is estimated to have increased 77.3% since 1990 and the Hispanic population has increased 217%, with a 44% increase since 2000. Lynn’s Hispanic population is more than three times the statewide average. The Hispanic population now represents 27.3% of the Lynn population, compared to the statewide estimate of 8.3% (ACS 2006-2008).

Selected Race and Ethnicity Characteristics and Trends

	1990	2000	2009 (est)	2014 (proj)
Population	81,245	89,050	86,491	85,270
% Change		9.6%	-2.9%	-1.4%
Race				
White	67,482	60,452	49,668	44,264
% Change	--	-10.4%	-17.8%	-10.9%
Black or African American	6,545	9,394	11,605	12,702
% Change		43.5%	23.5%	9.5%
American Indian & Alaskan Native	227	332	398	430
% Change	--	46.3%	19.9%	8.0%
Asian	3,003	5,730	6,913	7,426
% Change	--	90.8%	20.6%	7.4%
Pacific Islander	--	79	110	128
% Change	--	--	39.2%	16.4%
Other Race	3,988	8,744	12,517	14,566
% Change	--	119.3%	43.1%	16.4%
Two or More Races	--	4,319	5,280	5,754
% Change	--	--	22.3%	9.0%
Not of Hispanic Origin	65,166	72,667	62,906	57,816
% Change	--	11.5%	-13.4%	-8.1%
Hispanic Origin	7,432	16,383	23,585	27,454
% Change	--	120.4%	44.0%	16.4%

Source: US Census and Claritas, Inc.

Population by Single Race Classification 2009 (est.)

	2009 (est.)	% of Total Population
White	49,668	57.4%
Black or African American	11,605	13.4%
American Indian & Alaskan Native	398	.5%
Asian	6,913	8.0%
Pacific Islander	110	.1%
Other Race	12,517	14.5%
Two or More Races	5,280	6.1%
Total	86,491	

Source: US Census and Claritas, Inc.

- Thirty-one percent (31%) of Lynn residents were born in a foreign country, compared to a statewide estimate of 14% and 28% in Boston.
- A majority (57%) of foreign-born residents of Lynn are from Latin America.
- It is estimated that 23% of Lynn residents speak Spanish as their primary language at home.

Foreign Born Population

	2006-2008 (est.)	
	#	% of Total
Total Population	87,748	100.0%
Foreign Born Population	25,613	29.2%
Latin America	14,638	16.7%
Caribbean	5,860	6.7%
Central America	6,927	7.9%
South America	1,851	2.1%
Europe	4,056	4.6%
Northern Europe	517	0.6%
Western Europe	168	0.2%
Southern Europe	1,341	1.5%
Eastern Europe	2,030	2.3%
Asia	3,742	4.3%
Eastern Asia	197	0.2%
South Central Asia	138	0.2%
South Eastern Asia	3,277	3.7%
Western Asia	130	0.1%
Africa	2,498	2.8%
Other	679	0.8%

Source: 2006-2008 ACS

Education

- Lynn's public school enrollment of 13,373 (2009-2010) is 47.6% Hispanic, 26.1% White, 12.8% African American, 9.7% Asian, 3.4% multi-race, Non-Hispanic, and .4% Native American. The City's school age students lag behind the statewide average in school achievement as measured by the Massachusetts Comprehensive Assessment System (MCAS). The City has a lower rate of educational attainment than the statewide average: Lynn's public school 4-year graduation drop-out rate for 2009 is 13.6% as compared with 9.3% for Massachusetts; and the graduation rate is 70.7% for the City as compared with 81.5% for Massachusetts. In addition, 35.8% of minority persons 25 years and older in the City have less than a high school diploma. Of the 1,166 students included in the graduation data 223 students or 19.1% have limited English proficiency.

MCAS Tests Spring 2009

	Proficient		Warning/Failing	
	Lynn	Massachusetts	Lynn	Massachusetts
All Grades - English	41%	51%	17%	8%
All Grades - Mathematics	26%	32%	30%	16%

Source: Massachusetts Department of Elementary and Secondary Education

2009 4-Year Graduation Rates

	Lynn		Massachusetts
	#	% Graduated	% Graduated
All Students	1,166	70.7%	81.5%
Limited English Proficiency	223	61.9%	57.5%
Special Education	201	47.3%	64.9%
Low Income	981	68.7%	66.9%
Black or African American	156	67.3%	69.1%
Asian	134	75.4%	86.1%
Hispanic	459	67.8%	59.7%
White	371	73.9%	86.9%
Multi-race, Non-Hispanic	40	70.0%	80.5%

Source: Massachusetts Department of Elementary and Secondary Education

Educational Attainment of Minority Population in 2006-2008 (25+)

Attainment Level	Minority	
	#	%
Persons 25 years & over	14,990	
Less than high school diploma	5,364	35.8%
High school graduate, GED, or alternative	4,514	30.1%
Some college or associates degree	3,283	21.9%
Bachelor's degree or higher	1,829	12.2%

Source: ACS 2006-2008

Income

The 2009 estimated median household income of Lynn is \$43,941, up 17.6% from 2000. This estimated increase does not factor in the impact of inflation, nor does it necessarily capture the full impact of recession related layoffs. Median household income has not kept pace with the Consumer Price Index for the Boston area, which increased 27.3% during the same time.

Selected Income Data and Trends

	1990	2000	2009 (est)	2014 (proj)
Per Capita Income	\$12,936	\$17,492	\$20,667	\$22,413
% Change	--	35.2%	18.2%	8.4%
Median Household Income	\$28,573	\$37,364	\$43,941	\$47,173
% Change	--	30.8%	17.6%	7.4%
Median Family Income	\$36,447	\$45,295	\$57,129	\$61,641
% Change	--	24.3%	26.1%	7.9%
Average Annual Wage [1]	\$27,422	\$37,217	\$50,492	--
% Change	--	35.7%	35.7%	--
Median Family \$ - Boston [2]	\$46,300	\$65,500	\$85,780	\$95,321
% Change	--	41.5%	31.0%	11.1%
Consumer Price Index – Boston [3]	138.9	183.6	233.78	--
% Change	--	32.2%	27.3%	--

[1] Average annual wage for 1989, 1999, and 2008 from MA EOLWD

[2] Median Family Income for Boston MA-NH PMSA per US Dept. of HUD, PMSA Changed to Boston-Cambridge-Quincy MA-NH (slightly larger area) for 2009 est. and 2014 proj.

[3] Annual average for 1990, 2000 and 2009 per US Dept. of Labor Boston-Brockton-Nashua MA-NH-ME-CT

Source: US Census & Claritas, Inc.

- An estimated 16,469 people or nearly 19 % of Lynn’s population live in poverty. Since 2000 the number of people living in poverty increased by 1,944, even though the population declined during this period.
- Minorities and female-headed households experience poverty at higher rates. In 2009, it was estimated that 40% of female households with children in Lynn lived in poverty.

Poverty Status Trends

	2006-2008 (est.)			Change 00-08		
	Total	Below Poverty Level	% Below Poverty Level	Total	Below Poverty Level	% Below Poverty Level
Total (Above & Below Poverty):	87,366	16,469	18.9%	-571	1,944	2.3%
Age						
Under 18 years	21,673	4,672	21.6%	-1,795	-792	-1.7%
18 to 64 years	55,992	10,008	17.9%	2,373	2,526	3.9%

Poverty Status Trends

	2006-2008 (est.)			Change 00-08		
	Total	Below Poverty Level	% Below Poverty Level	Total	Below Poverty Level	% Below Poverty Level
65 years and over	9,701	1,789	18.4%	-1,149	210	3.9%
Race						
White	57,542	9,689	16.8%	-1,858	2,040	4.0%
Black or African American	12,655	2,633	20.8%	3,412	627	-0.9%
Asian	4,764	1,046	22.0%	-1,112	-280	-0.6%
Other Race	8,910	2,386	26.8%	-178	-175	-1.4%
Two or More Races	3,448	715	20.7%	-882	-268	-2.0%
Hispanic or Latino origin (of any race)	22,367	6,013	26.9%	6,219	1,807	0.8%
White Alone, Not Hispanic or Latino	48,502	7,318	15.1%	-6,147	683	2.9%

Source: 2006-2008 ACS

Employment

- Lynn continues to experience a decrease in available jobs with continued losses in the manufacturing sector. While the city has gained jobs in financial services and professional services, it has lost jobs in every other sector at a significantly higher rate than the North Shore region. Although, Lynn’s median family income has increased it is significantly below the family income for Massachusetts, Essex County and the City of Boston.
- The February 2010 unemployment rate in Lynn was 10.97%. This compares to the statewide rate of 9.3% (March, 2010, U.S. Bureau of Labor Statistics).

Trends in Employment Status

	1990	2000	2009 (Feb)	2010 (Feb)
Civilian Labor Force	39,776	41,842	41,823	41,920
Employed	36,053	39,243	37,965	37,323
Unemployed	3,723	2,599	3,858	4,597
% of Labor Force	9.36%	6.21%	9.22%	10.97%

Source: US Census, MA EOLWD

- Almost 48% of employed Lynn residents are employed in the service industry and in sales and office jobs.
- From 2001 to 2008, Lynn gained 24 new businesses, an increase of 1.84%. However, the overall number of jobs in Lynn dropped by 2,363 or nearly 9.4%.

- From 2001 to 2008 the sectors with the greatest loss in the number of jobs were manufacturing (1,059 jobs, 17.3% decline), education and health (377 jobs, 4.6% decline) and construction (349 jobs, 38.1% decline).
- From 2001 and 2008 Lynn experienced an increase in jobs in the financial and real estate sectors adding 283 new jobs, an increase of 23.4%.

7. STRATEGIC PLAN FOR HOUSING

Lynn is an older city with an aged housing stock that reflects its industrial heritage. Nearly 50% of all housing units in the City are more than seventy years old, resulting in the need for continual reinvestment. An estimated 55% of all households have one or more housing problems as defined by HUD. Renters outnumber homeowners in the City. While the national rate of homeownership is 67%, Lynn's homeownership rate is estimated to be 48%. Minority homeownership rates have dramatically increased over the past twenty years; however, the overall homeownership rate within the City has remained relatively unchanged.

Approximately 66% of all Lynn households meet HUD's definition of low or moderate income, i.e. households earning less than 80% of area median income. Thus, serious affordability issues and other housing problems exist among both homeowners and renters. Almost 45% of Lynn's homeowners face serious affordability issues, i.e. household incomes are not sufficient to cover monthly costs. Although rents remain lower than rents throughout the region, 44% of all renter households struggle to afford their rent.

The recession has had a serious impact on Lynn's housing market, resulting in a high number of foreclosures, substantial increases to vacancy rates, a decrease in the average sales prices of homes, a reduction in building activity, and an increase in the number of both renter and owner households who are unable to afford housing due to reductions in income and/or layoffs. High unemployment rates and a continuing reduction in the number of jobs available within Lynn has resulted in less disposable income available for homeowners to make repairs and improvements to their aging properties and for renters to afford suitable housing. Other longer term issues persist including problems associated with an aging housing stock, the deterioration of the urban core, and the need to preserve existing housing resources.

The City continues to provide subsidized and special needs housing at a rate significantly higher than the statewide or regional averages, resulting in high demands on municipal services and highlighting the need for regional solutions. At the same time, a significant number of subsidized properties may be at-risk due to expiring use over the term of the Plan.

Addressing these complex issues in a coordinated and strategic manner are priorities for the City's Strategic Plan for housing over the next five years as described below.

Housing Market Analysis

The City previously commissioned two full housing market analyses in 1998 and 2003. Much of the submarket data from the 2003 analyses was updated for the 2010 Consolidated Plan process. This includes updates to conditions and trends found in Lynn and its 24 submarkets, as well as, regional and statewide trends where appropriate. It should be noted that much of the data presented herein, including Census data, does not fully reflect the impact of the recession due to lags in the availability of real-time information.

Housing Supply Trends - As shown in the table below, Lynn had an estimated housing supply of 36,038 units in 2008. This represents a nearly 4 percent increase in housing units from 2000. However, the vacancy rate has increased from 3.25% in 2000 to 9.14% for the 2006-2008 estimate. This number remains lower than the statewide vacancy rate of 9.71% for the same time period.

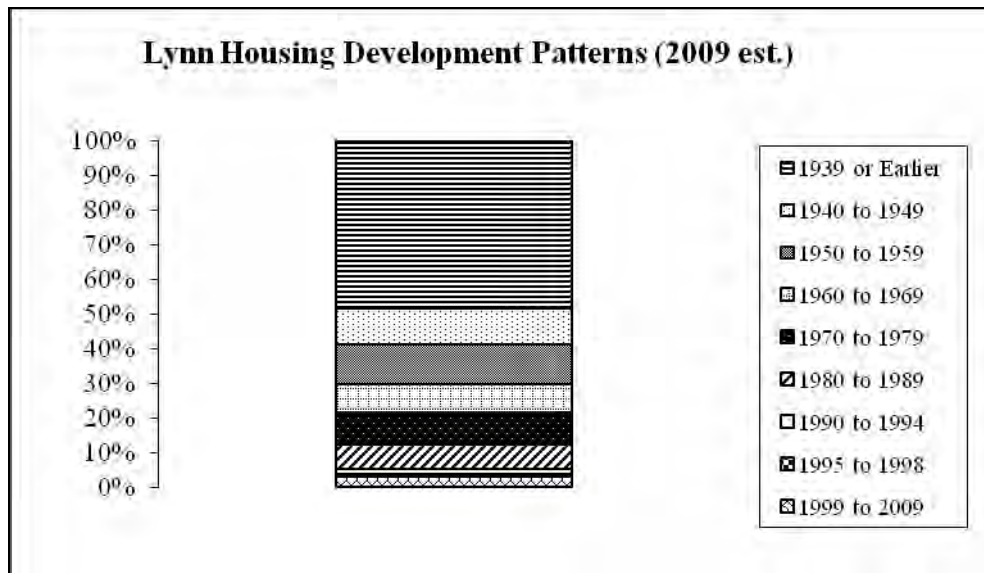
Housing Supply, Tenure and Vacancy Trends

	#		% of Total [1]		Change 00-08	
	2000	2006-2008 (ACS)	2000	2006-2008 (ACS)	#	%
Housing Units	34,690	36,038	100.00%	100.00%	1,348	3.9%
Occupied	33,563	32,743	96.8%	90.9%	-820	-2.4%
Owner Occupied	15,315	15,642	45.6%	47.8%	327	2.1%
Renter Occupied	18,248	17,101	54.4%	52.2%	-1,147	-6.3%
Vacant	1,127	3,295	3.2%	9.1%	2,168	192.4%
Seasonal	46	114	0.1%	0.3%	68	147.8%

[1] Owner and Renter occupied units are factored on occupied units, only

Source: US Census, 2006-2008 ACS

Nearly 50% of Lynn’s housing stock is more than 70 years old. This denotes a significantly aged housing supply that requires a higher level of investment to maintain and which presents significant challenges to Lynn’s large population of low income homeowners.



Reflecting the impact of the recession, the number and value of building permits issued for both new construction and renovations in Lynn has sharply declined from the most recent peak in 2004-05. This is a key indicator that shows that both development of new housing and

renovations to existing housing has stalled. Proposed revitalization activities discussed in the Waterfront Master Plan Report, Washington Street Gateway and Market Street Gateway are not currently reflected in the building permit activity shown below.

Residential Building Permits 2000-2009

Calendar Year	New Construction Residential #	Additions/Alterations Residential Value	Total	
			No.	Value
2009	13	1,913,000	859	10,313,597
2008	20	3,134,500	895	16,964,739
2007	24	5,801,000	925	12,481,962
2006	45	9,867,760	975	13,319,203
2005	80	12,399,374	616	22,188,687
2004	112	17,574,087	719	13,560,301
2003	76	12,244,488	541	12,982,224
2002	81	11,374,259	532	6,317,694
2001	57	9,553,248	307	4,904,888
2000	45	5,801,600	343	3,831,818

Nearly 65% of Lynn's housing stock is located in multi-family housing. Approximately 23% of Lynn's housing units are found in structures of 10 units or more. The majority (58%) of Lynn's housing units are 2-3 bedroom units.

Trends in Units by Number of Bedroom

Bedrooms	2000	2006-2008 (est.)	% of Total		Change 00-08	
			2000	2006-2008 (est.)	#	%
No bedrooms	1,125	735	3.2%	2.0%	-390	-34.7%
1	8,296	7,695	23.9%	21.4%	-601	-7.2%
2	11,364	13,107	32.8%	36.4%	1,743	15.3%
3	10,097	10,625	29.1%	29.5%	528	5.2%
4	2,676	2,433	7.7%	6.8%	-243	-9.1%
5 or more	1,132	1,443	3.3%	4.0%	311	27.5%
Total	34,690	36,038	100%	100%	1,348	3.9%

Source: US Census, 2006-2008 ACS

Home Ownership and Foreclosure Trends - Lynn is predominately a renter city. The number of owner-occupied units is estimated at 15,642 or nearly 48% of all occupied housing units. This represents a slight (2.2%) increase in homeownership from 2000. In comparison, owner-occupancy nationwide was 67% and statewide it was 65%.

The percentage of minority households in Lynn who are homeowners also increased slightly by 2.3% since 2000. At 24.9%, the rate of minority households who are homeowners represents a

substantial increase over the 1990 rate of 15.7%; however, it now represents only about half of the city-wide homeownership rate. It is also less than the national (50%) rate and the state benchmark (37%) for minority homeownership. Minority homeownership in Lynn continues to be significantly higher than that in neighboring communities.

Minority Tenure Characteristics and Trends

	All Households	Tenure Rate	Minority Households	Tenure Rate	Minority as % of All
1990					
Owner occupied	14,577	46.2%	709	15.7%	4.9%
Renter occupied	16,977	53.8%	3,814	84.3%	22.5%
Total	31,554	100%	4,523	100%	14.3%
2000					
Owner occupied	15,315	45.6%	2,142	22.6%	14.0%
Renter occupied	18,248	54.4%	7,320	77.4%	40.1%
Total	33,563	100%	9,462	100%	28.2%
2006-2008 (est.)					
Owner occupied	15,642	47.8%	2,298	24.9%	14.7%
Renter occupied	17,101	52.2%	6,932	75.1%	40.5%
Total	32,743	100%	9,230	100%	28.2%

Source: US Census, 2006-2008 ACS

Residential sales prices in Lynn have suffered significantly, especially among condo sales. While the volume of sales increased from 2008 to 2009, the median price of all residential sales dropped nearly 8% to \$178,500. Since 2002, median sales prices for all housing types have dropped significantly. Condo sale prices are down 23%, single-family homes are down 12%, two-family home prices have dropped nearly 41% and three-family homes are down more than 45% from 2002 sales.

Residential Home Sales 2008-2009

	Number of Sales			Median Price		
	2008	2009	% Change 08-09	2008	2009	% Change 08-09
1 Family	431	467	8.4%	\$206,000	\$196,000	-4.9%
2 Family	139	186	33.8%	\$185,000	\$160,000	-13.5%
3 Family	130	138	6.2%	\$180,000	\$188,225	4.6%
Condo	97	129	33.0%	\$164,500	\$111,550	-32.2%
All Sales	868	989	13.9%	\$193,450	\$178,500	-7.7%

Source: Warren Group

Adding to the slide in real estate values, Lynn has been hard hit by the current foreclosure crisis. In 2008, Lynn had 307 foreclosure auctions, representing approximately 29% of all of the foreclosures in the region. According to the Foreclosure Monitor, Lynn has the third highest rate of distressed units in the state (behind Lawrence and Brockton) at 39.5 per 1000 units compared

to the statewide average of 15.73. This represents a nearly 12% increase over the past year. According to Zillow.com, 66.3% of homes purchased between 2004 and 2008 in the Lynn zip code of 01901 have negative equity (“underwater”), which represents one of the highest rates in the state. This raises concerns regarding more foreclosures in the future as new homeowners who become unemployed have inadequate financial resources to pay household carrying costs.

Housing Problems - It is estimated that 55% of Lynn’s housing units have one or more housing problems, i.e. substandard conditions, overcrowding, no income or rent or cost burdens. An estimated 62.7% of rental units have one or more housing problems, compared to 47.4% of owner-occupied units. Lack of affordability is the number one issue, impacting 44% of all housing units in the City. Substandard conditions are found in approximately 1% of housing units in the City; however, there have been increasing reports of rodent infestation in the Downtown and urban core areas.

Housing Problems by Severity (2007 estimate)

	Owner		Renter		Total	
	#	%	#	%	#	%
Total Housing Units	15,800	100.0%	16,540	100.0%	32,340	100.0%
Total Units with no Housing Problems	8,310	52.6%	6,170	37.3%	14,480	44.8%
Total Units with Housing Problems	7,485	47.4%	10,370	62.7%	17,855	55.2%
Substandard	140	0.9%	185	1.1%	325	1.0%
Overcrowded	260	1.6%	1,090	6.6%	1,350	4.2%
Severely Overcrowded	40	0.3%	95	0.6%	135	0.4%
No Income or No Cash Rent	485	3.1%	1,370	8.3%	1,855	5.7%
Cost Burdened (>30% of inc. on housing)	3,495	22.1%	3,495	21.1%	6,990	21.6%
Severely Cost Burdened (>50% of inc.)	3,065	19.4%	4,135	25.0%	7,200	22.3%

2009 CHAS Data

Sixty-four percent (64%) of housing problems are experienced by extremely low-income households, i.e. those making 30 percent AMI, or below.

Population with Severe Housing Problems (2007 estimate)

	Total		Owner		Renter	
	#	%	#	%	#	%
Total	8,125	100.0%	3,280	40.4%	4,845	59.6%
30% AMI or less	5,165	63.6%	1,290	39.3%	3,875	80.0%
30.1% - 50%	1,510	18.6%	735	22.4%	775	16.0%
50.1% - 80%	945	11.6%	895	27.3%	50	1.0%
80.1% - 95%	155	1.9%	155	4.7%	0	0.0%
95.1% and above	350	4.3%	210	6.4%	140	2.9%

2009: CHAS Data

Incidences of severe housing problems are pervasive among all racial/ethnic groups, although African-American and Hispanic households are more likely to have housing problems than White households.

Severe Housing Problems by Race (2007 est.)

	Total	% of Total	Total w/ Severe Housing Problems	% of Those with Severe Housing Problems
Total	32,340	100.0%	8,125	100.0%
White	20,890	64.6%	4,800	59.1%
Black	3,125	9.7%	935	11.5%
Asian	1,295	4.0%	250	3.1%
Hispanic	6,630	20.5%	2,065	25.4%
American Indian	55	0.2%	0	0.0%
Other	330	1.0%	70	0.9%

Source: 2009 CHAS Data

By Race and Ethnicity Income Renter-Occupied with Severe Housing Problems (2007 est.)

	White		Black		Asian		Hispanic		Other	
	#	% (of total)	#	%	#	%	#	%	#	%
Total = 4845										
Total	2465	50.9%	660	13.6%	145	3.0%	1530	31.6%	40	0.8%
30% AMI or less	2075	42.8%	420	8.7%	130	2.7%	1210	25.0%	40	0.8%
30.1% - 50%	280	5.8%	160	3.3%	15	0.3%	320	6.6%	0	0.0%
50.1% - 80%	30	0.6%	20	0.4%	0	0.0%	0	0.0%	0	0.0%
80.1% - 95%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
95.1% and above	80	1.7%	60	1.2%	0	0.0%	0	0.0%	0	0.0%

Source: 2009 CHAS Data

Fifty-eight percent (58%) of all disabled households and 40% of all elderly households experience severe housing problems. Extremely low income seniors experience housing problems at an even higher rate (57%).

Housing Problems of Disabled (2007 est.)

	Owner		Renter		Total	
	#	%	#	%	#	%
Total Disabled Households	1,765	100.0%	1,815	100.0%	3,580	100.0%
Disabled Households with Housing Problems	815	46.2%	1,270	70.0%	2,085	58.2%

Source: 2009 CHAS Data

Housing Problems of the Elderly (2007 est.)

	Total Households		Elderly Households		Extra Elderly Households		Total Elderly	
	#	%	#	%	#	%	#	%
Total	32,340	100.0%	5,055	15.6%	3,630	11.2%	8,685	26.9%
HH with Housing Problems All Incomes	16,000	49.5%	2,100	41.5%	1,405	38.7%	3,505	40.4%
30% AMI or less	6,700	41.9%	1,090	51.9%	915	65.1%	2,005	57.2%
30.1% - 50%	3,670	22.9%	410	19.5%	215	15.3%	625	17.8%
50.1% - 80%	3,245	20.3%	325	15.5%	140	10.0%	465	13.3%
80.1% - 95%	925	5.8%	135	6.4%	15	1.1%	150	4.3%
95.1% and above	1,455	9.1%	140	6.7%	120	8.5%	260	7.4%

Source: 2009 CHAS Data

Housing Affordability - As of 2007, 41.5% of all owner households and 46.1% of all renter households incurred housing costs of 30% or more of income. In total, there are more households that are severely cost-burdened, i.e. paying more than 50% of their income on housing, in Lynn than there are households that are moderately cost-burdened, i.e. paying 30-49% of income on housing.

Cost Burdened Units (2007 estimate)

	Owner		Renter		Total	
	#	%	#	%	#	%
Total Housing Units	15,800	100.0%	16,540	100.0%	32,340	100.0%
Cost Burdened (>30% of inc. on housing)	3,495	22.1%	3,495	21.1%	6,990	21.6%
Severely Cost Burdened (>50% of inc.)	3,065	19.4%	4,135	25.0%	7,200	22.3%

Source: 2009 CHAS Data

Minority households experience housing cost burdens at higher rates than white households.

Number of Households by Cost Burden by Race/Ethnicity

	# of Households			Total Severe & Moderate Cost Burden as % of Total Households
	Severe Cost Burden	Moderate Cost Burden	Total Severe & Moderate Cost Burden	
Owner				
White	2,235	2,550	4,785	14.8%
Black	275	160	435	1.3%
Asian	85	245	330	1.0%
American Indian	0	20	20	0.1%
Hispanic	520	515	1,035	3.2%
Other	30	75	105	0.3%
Total Owner	3,145	3,565	6,710	20.7%

	# of Households			Total Severe & Moderate Cost Burden as % of Total Households
	Severe Cost Burden	Moderate Cost Burden	Total Severe & Moderate Cost Burden	
Renter				
White	2,355	1,565	3,920	12.1%
Black	585	510	1,095	3.4%
Asian	140	235	375	1.2%
American Indian	0	0	0	0.0%
Hispanic	1,500	1,365	2,865	8.9%
Other	40	0	40	0.1%
Total Renter	4,620	3,675	8,295	25.6%
Total Owner & Renter				
White	4,590	4,115	8,705	26.9%
Black	860	670	1,530	4.7%
Asian	225	480	705	2.2%
American Indian	0	20	20	0.1%
Hispanic	2,020	1,880	3,900	12.1%
Other	70	75	145	0.4%
Total	7,765	7,240	15,005	46.4%

Source: 2009 CHAS data

Rents peaked in 2008 and generally decreased from 2008-2009. In 2009, the average market-rate rent for a two-bedroom apartment was \$969 according to LHAND's rent comparability survey. In comparison, the HUD Fair Market Rent for the region was \$1345 for a two-bedroom apartment, although this is calculated at the 40% percentile of rents charged for recently rented units. Note that the table below is based on LHAND's internally developed rent survey and, as such, may not fully reflect market conditions in the City.

City of Lynn Surveyed Average Rents

	2006	2007	2008	2009	% Change 06-09
0 Bedroom	\$ 621.00	\$ 602.00	\$ 681.00	\$ 649.00	
% change	--	-3.1%	13.1%	-4.7%	4.5%
1 Bedroom	\$ 782.00	\$ 755.00	\$ 820.00	\$ 791.00	
% change	--	-3.5%	8.6%	-3.5%	1.2%
2 Bedroom	\$ 906.00	\$ 894.00	\$ 1,006.00	\$ 969.00	
% change	--	-1.3%	12.5%	-3.7%	7.0%
3 Bedroom	\$ 1,066.00	\$ 1,003.00	\$ 1,041.00	\$ 1,090.00	
% change	--	-5.9%	3.8%	4.7%	2.3%
4 Bedroom	\$ 1,356.00	\$ 1,275.00	\$ 1,481.00	\$ 1,356.00	
% change	--	-6.0%	16.2%	-8.4%	0.0%
5 Bedroom	--	--	\$ 1,650.00	--	
% change	--	--	--	--	

Source: LHAND Rent Comparability Survey

**Boston-Cambridge-Quincy, MA
HUD Fair Market Rents[1] 2010**

	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
2006	\$ 1,063.00	\$ 1,128.00	\$ 1,324.00	\$ 1,584.00	\$ 1,740.00
2007	\$ 1,097.00	\$ 1,164.00	\$ 1,366.00	\$ 1,634.00	\$ 1,795.00
2008	\$ 1,086.00	\$ 1,153.00	\$ 1,353.00	\$ 1,618.00	\$ 1,778.00
2009	\$ 1,080.00	\$ 1,146.00	\$ 1,345.00	\$ 1,609.00	\$ 1,767.00
2010	\$ 1,090.00	\$ 1,156.00	\$ 1,357.00	\$ 1,623.00	\$ 1,783.00

[1] HUD Fair Market Rents (FMR) represent gross rents (rent plus all tenant-paid utilities). The FMR does not include non-market rents and is currently defined as the 40 percentile rent.

Source: HUD

LHAND has documented that other regional Housing Authorities are leasing units in Lynn through the Section 8 program at rent levels which exceed LHAND’s surveyed average rents. This creates serious concerns regarding unnecessary inflation of rents in the City’s neighborhoods. It also negatively impacts LHAND’s ability to deconcentrate poverty in impacted areas and is potentially an impediment to fair housing choice. LHAND intends to raise this issue with appropriate federal and state agencies.

Subsidized Housing Stock - Lynn’s housing stock includes 4,423 subsidized affordable units that are project-based. In addition to this inventory, LHAND administers several state and federal tenant-based rental assistance programs. Continuation of rental assistance programs is subject to annual appropriations at the federal and state level.

This percentage of subsidized housing in Lynn is calculated at from 12.3% to 13.7% depending on which data source is used to determine the total universe of units. This range significantly outpaces the statewide total of 8.5%. Lynn’s neighboring communities fell far short of the statewide 10% goal including Lynnfield (1.8%), Nahant (2.9%), Peabody (7.6%), Saugus (6.2%) and Swampscott (3.2%). The lack of affordable housing in these communities forced their low-income households to seek “affordable” housing elsewhere.

Lynn has exceeded the state goal of 10% subsidized housing stock for many years heightening the need to incorporate market rate housing into new housing development plans wherever feasible. However, expiring use properties are a significant concern in the coming years. The table below indicates that from 2010 to 2015 affordability protections on 1,429 subsidized units may expire, representing 32% of all subsidized housing units in the city. The Community Economic Development Assistance Corporation (CEDAC) estimates that 533 units in Lynn with subsidized mortgages or HUD project-based rental assistance may be at risk of losing their subsidies through the year 2012 alone.

Chapter 40B Subsidized Housing Inventory in Lynn

Lynn DHCD ID #	Project Name	Address	Type	Total SHI Units	Affordability Expires	Built w/ Comp. Permit?	Subsidizing Agency
1705	Curwin Circle	92 Curwin Circle	Rental	277	Perp	No	HUD
1706	M Henry Wall	95 Tremont St.	Rental	176	Perp	No	HUD

Lynn DHCD ID #	Project Name	Address	Type	Total SHI Units	Affordability Expires	Built w/ Comp. Permit?	Subsidizing Agency
	Plaza						
1707	Caggiano Plaza	174 South Common St.	Rental	105	Perp	No	DHCD
1708	Essex/Tilton	Essex-Tilton Sts	Rental	47	Perp	No	DHCD
1709	Mary McGee House	37 Green Street	Rental	50	Perp	No	DHCD
1710	Meadow Court	174 South Common St.	Rental	85	Perp	No	DHCD
1711	Olive St.	6 Olive St.	Rental	24	Perp	No	DHCD
1712	Woodman Street	Woodman St	Rental	40	Perp	No	DHCD
1713	n/a	39 Shepard St/Warren St	Rental	16	Perp	No	DHCD
1714	n/a	Scattered sites	Rental	29	Perp	No	DHCD
1715	n/a	72 Neptune Street	Rental	6	Perp	No	DHCD
1716	104 South Common	104 South Common St	Rental	7	2006	No	HUD
1717	136-140 Franklin Street	136-140 Franklin St	Rental	8	2010	No	MHP
1718	14-18 Marion Street	14-18 Marion St.	Rental	6	2018	No	MHP
1719	22 Warren Street	22 Warren St.	Rental	21	2019	No	MHP
1720	29-35 Sagamore Street	29-35 Sagamore St	Rental	12	2019	No	MHP
1721	534 Essex Street	534 Essex St	Rental	32	2011	No	HUD FHLBB
1722	81 Whiting Street	81 Whiting Street	Rental	21	2012	No	MHP
1723	Chestnut Gardens Apts	196-216 Chestnut St./301 Essex St	Rental	65	2010	No	HUD
1724	Cobbett Hill	498 Essex Street	Rental	117	2018	No	DHCD
1726	Essex & Alice Streets	177 Essex St; 3 Alice St	Rental	12	2012	No	MHP
1727	Broad St Apts	103-109 Broad St.	Rental	60	06/30/2008	No	HUD
1728	Fabens Building	312-332 Union Street	Rental	37	04/22/2011	No	MassHousing
1729	St. Mary's Plaza	30 Pleasant St.	Rental	99	2023	No	HUD
1731	Harbor Loft Apartments	7 Liberty Sq; 678 Washington St	Rental	358	2012	No	MassHousing MassHousing
1732	King's Lynne	Garfield Ave/ O'Callaghan Way	Rental	441	2020	No	MassHousing
1733	Kings Beach Tower	130 Eastern Avenue	Rental	183	2017	No	MassHousing
1734	Leisure Towers	10 Farrar St	Rental	181	2029	No	HUD MassHousing
1735	Louis Barrett House	147 Washington St/ Whittier St/Hanover St	Rental	145	2091	No	DHCD MassHousing
1736	Marian Gardens	Blossom & Neptune St (18 Anderson Ln)	Rental	93	2010	No	HUD
1738	Neptune Towers	Neptune Boulevard	Rental	334	2034	No	HUD
1739	New Rockmere Gardens	32 Commercial St.	Rental	12	2015	No	HUD
1740	North Commons Street	53-55 N. Common St; 159 Essex St	Rental	13	2016	No	MHP
1741	North Commons Terrace	1-3,2-12,79-81 N. Common Terrace	Rental	21	2018	No	MHP

Lynn DHCD ID #	Project Name	Address	Type	Total SHI Units	Affordability Expires	Built w/ Comp. Permit?	Subsidizing Agency
1742	Ocean Shores	50 Lynnway	Rental	202	2011	No	MassHousing
1743	Olympia Square	429 West Washington St.	Rental	44	2012	No	HUD
1746	Quaker Meadows	65 Memorial Pk Ave./70 Green St	Rental	103	2013	No	MassHousing
1747	Rockmere Gardens	26-28 Commercial St.	Rental	60	2015	No	HUD
1748	Rolfé House	7 Willow St. at Blake	Rental	70	2010	No	MassHousing
1749	Section 8 Mod Rehab	Scattered sites	Rental	103	2011	No	DHCD
1750	Silsbee Tower	67 Silsbee Street	Rental	146	2014	No	MassHousing
1751	St. Stephen's Tower	25 Pleasant St. & Bond	Rental	130	03/01/2017	No	MassHousing
1752	The Ruth	2 Rogers Ave	Rental	32	2011	No	HUD
1753	Washington Street	172,172a,176 Washington St.	Rental	40	2018	No	MHP
1754	Western Avenue	653-661 Western Ave	Rental	31	2012	No	MHP
1755	Willow Apartments Trust	19 Willow St.	Rental	44	2005	No	HUD
1756	Wilson Gardens	189-199 Lewis St, 6-10 Wilson Terr	Rental	26	2021	No	MassHousing
3922	St. Theresa House	32 South Common Street	Rental	32	2054	No	HUD DHCD
3923	Brickyard Village	22-28 Warren St; Shepard St, LaGrange Terr, June Lane	Rental	28	2033	No	DHCD DHCD
4348	DMR Group Homes	Confidential	Rental	94	N/A	No	DMR
4576	DMH Group Homes	Confidential	Rental	43	N/A	No	DMH
6706	St. Jean Baptiste	Franklin, Lyman, Endicott & Leighton Streets	Rental	24	Perp	No	DHCD MHP DHCD DHCD HUD
6707	YMCA Expansion	20 Neptune Boulevard	Rental	38	2034	No	HUD DHCD DHCD
		Citywide Total		4,423			

Source: Massachusetts Department of Housing and Community Development

Residential Tax Base Trends - Residential assessments accounted for approximately 85.7% of the City's taxable assessments in 2010 as compared to 89% in 2004 and 75% in 1985. Because of the split-tax rate, residential properties accounted for 75% of the City's tax levy in 2010 compared to 79% in 2004 and 63% in 1985. This indicates that the city continues to rely heavily on residential uses for its taxes and Lynn's commercial and industrial base did not keep pace.

The residential portion of Lynn's tax base is a critically important source of municipal revenue as it generates approximately 75% of the real estate taxes in the City. Lynn's dependence on residential uses is higher than indicated for the region and state, but lower than a few towns in the region.

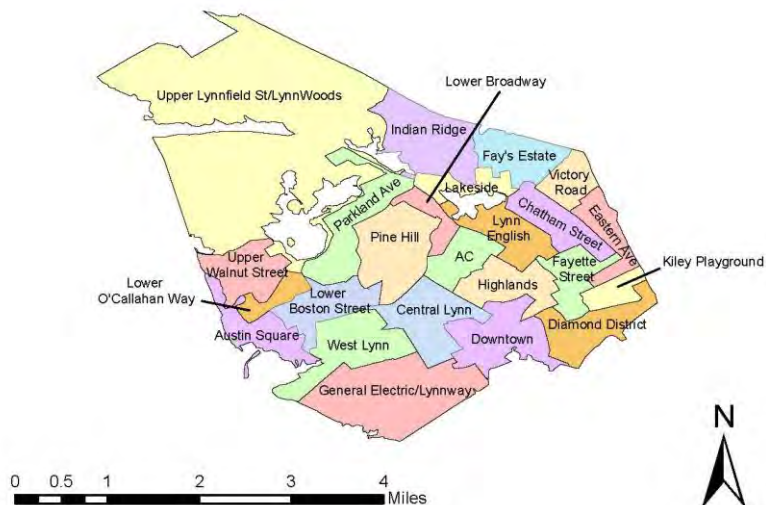
Housing Submarket Analysis

The City has organized neighborhoods into 24 submarkets in order to understand the demographic, housing and real estate market characteristics of these areas. The boundaries of the submarkets followed the delineation of the 2000 census block groups, which were joined together under the following premises:

- Housing tenure, or owner-occupancy in comparison to renter-occupancy;
- Geographic or man-made barriers such as highways or railroad lines; and
- Major commuter routes and commercial corridors

The following map shows the boundaries of the 24 submarkets.

Lynn Submarkets



Population, Race and Ethnicity by Submarket

- Central Lynn and the Highlands are the most populated submarkets in the city with 18,276 people, or 21% of the city's population.

City of Lynn, Submarket Comparison: Population & Households

#	Submarket	2009 (est.)		Distribution by Submarket	
		Population	Households	Population	Households
	City of Lynn	86,491	31,989	100%	100%
1	Upper Lynnfield St.	5,141	1,911	5.9%	6.0%

City of Lynn, Submarket Comparison: Population & Households

#	Submarket	2009 (est.)		Distribution by Submarket	
		Population	Households	Population	Households
2	Indian Ridge	2,124	788	2.5%	2.5%
3	Fay's Estate	1,312	479	1.5%	1.5%
4	Lakeside	1,372	614	1.6%	1.9%
5	Lower Broadway	862	356	1.0%	1.1%
6	Pine Hill	3,655	1,191	4.2%	3.7%
7	Parkland Ave.	1,658	606	1.9%	1.9%
8	Lower Boston St.	4,228	1,499	4.9%	4.7%
9	Lower O'Callahan	1,331	448	1.5%	1.4%
10	Upper Walnut St.	1,704	702	2.0%	2.2%
11	Austin Square	2,415	965	2.8%	3.2%
12	Victory Road	1,132	492	1.3%	1.5%
13	Chatham Street	4,173	1,494	4.8%	4.7%
14	Lynn English	3,699	1,330	4.3%	4.2%
15	Agganis AC	3,312	1,056	3.8%	3.3%
16	West Lynn	6,267	2,000	7.2%	6.3%
17	Eastern Avenue	2,629	948	3.0%	3.0%
18	Kiley Playground	2,237	914	2.6%	2.9%
19	Fayette St	6,154	1,969	7.1%	6.2%
20	Highlands	7,860	2,462	9.1%	7.7%
21	Central Lynn	10,416	3,525	12.0%	11.0%
22	Diamond District	6,619	3,190	7.7%	10.0%
23	Downtown	5,146	2,732	5.9%	8.5%
24	GE-Lynnway	1,045	318	1.2%	1.0%

Source: Claritas, Inc.

- While, city-wide the population is 57.4% white and 42.6% minority, within individual submarkets, there are significant variances including a number of submarkets in which less than 15% of the population is minority.
- Four submarkets – Central Lynn, Highlands, Downtown and Fayette Street house more than 50% of the city’s African-American population.
- The Hispanic population is heavily concentrated in the Highlands, Central Lynn and Fayette Street submarkets. The Hispanic population comprises more than 40% of the population in each of these submarkets.

City of Lynn, Submarket Comparison: Race and Ethnicity 2009 (est.)

#	Submarket	Population	White		Black or African American		American Indian and Alaskan Native		Asian		Native Hawaiian and Other Pacific Islander		Some Other Race		Two or More Races		Hispanic or Latino	
			#	% of Total Population	#	% of Total Population	#	% of Total Population	#	% of Total Population	#	% of Total Population	#	% of Total Population	#	% of Total Population	#	% of Total Population
	City of Lynn	86,491	49,668	57.43%	11,605	13.42%	398	0.46%	6,913	7.99%	110	0.13%	12,517	14.47%	5,280	6.10%	23,585	27.27%
1	Upper Lynnfield St.	5,141	4,869	94.71%	94	1.83%	10	0.19%	40	0.78%	9	0.18%	39	0.76%	77	1.50%	112	2.18%
2	Indian Ridge	2,124	1,910	89.92%	115	5.41%	9	0.42%	37	1.74%	2	0.09%	32	1.51%	17	0.80%	93	4.38%
3	Fay's Estate	1,312	1,202	91.62%	49	3.73%	0	0.00%	10	0.76%	0	0.00%	24	1.83%	26	1.98%	57	4.34%
4	Lakeside	1,372	1,177	85.79%	68	4.96%	0	0.00%	35	2.55%	3	0.22%	58	4.23%	31	2.26%	99	7.22%
5	Lower Broadway	862	729	84.57%	49	5.68%	2	0.23%	20	2.32%	0	0.00%	34	3.94%	28	3.25%	58	6.73%
6	Pine Hill	3,655	2,138	58.50%	436	11.93%	16	0.44%	323	8.84%	5	0.14%	517	14.15%	202	5.53%	962	26.32%
7	Parkland Ave.	1,658	1,558	93.97%	41	2.47%	1	0.06%	20	1.21%	0	0.00%	7	0.42%	31	1.87%	62	3.74%
8	Lower Boston St.	4,228	3,042	71.95%	318	7.52%	15	0.35%	275	6.50%	3	0.07%	378	8.94%	171	4.04%	638	15.09%
9	Lower O'Callahan	1,331	515	38.69%	165	12.40%	17	1.28%	332	24.94%	0	0.00%	233	17.51%	68	5.11%	375	28.17%
10	Upper Walnut St.	1,704	1,353	79.40%	241	14.14%	3	0.18%	13	0.76%	0	0.00%	39	2.29%	55	3.23%	135	7.92%
11	Austin Sq	2,415	1,731	71.68%	138	5.71%	5	0.21%	182	7.54%	0	0.00%	240	9.94%	110	4.55%	327	13.54%
12	Victory Rd	1,132	1,024	90.46%	37	3.27%	0	0.00%	3	0.27%	0	0.00%	34	3.00%	33	2.92%	35	3.09%
13	Chatham Street	4,173	2,739	65.64%	446	10.69%	29	0.69%	186	4.46%	6	0.14%	501	12.01%	251	6.01%	842	20.18%
14	Lynn English	3,699	2,467	66.69%	346	9.35%	13	0.35%	255	6.89%	3	0.08%	464	12.54%	146	3.95%	674	18.22%
15	Agganis AC	3,312	1,454	43.90%	595	17.96%	9	0.27%	376	11.35%	0	0.00%	615	18.57%	253	7.64%	1,039	31.37%
16	West Lynn	6,267	2,531	40.39%	920	14.68%	35	0.56%	1,015	16.20%	44	0.70%	1,084	17.30%	615	9.81%	2,187	34.90%
17	Eastern Avenue	2,629	1,891	71.93%	244	9.28%	9	0.34%	132	5.02%	0	0.00%	196	7.46%	156	5.93%	451	17.15%
18	Kiley Playground	2,237	1,397	62.45%	325	14.53%	17	0.76%	144	6.44%	3	0.13%	193	8.63%	151	6.75%	481	21.50%
19	Fayette St	6,154	2,496	40.56%	1,020	16.57%	44	0.71%	955	15.52%	8	0.13%	1,160	18.85%	449	7.30%	2,549	41.42%
20	Highlands	7,860	2,597	33.04%	1,439	18.31%	36	0.46%	864	10.99%	15	0.19%	2,312	29.41%	566	7.20%	3,823	48.64%
21	Central Lynn	10,416	3,636	34.91%	2,338	22.45%	70	0.67%	1,297	12.45%	1	0.01%	2,084	20.01%	964	9.25%	4,853	46.59%
22	Diamond District	6,619	4,330	65.42%	940	14.20%	15	0.23%	163	2.46%	6	0.09%	713	10.77%	365	5.51%	1,321	19.96%
23	Downtown	5,146	2,413	46.89%	1,053	20.46%	29	0.56%	94	1.83%	0	0.00%	1,108	21.53%	438	8.51%	1,949	37.87%
24	GE-Lynnway	1,045	469	44.88%	188	17.99%	14	1.34%	142	13.59%	2	0.19%	153	14.64%	77	7.37%	463	44.31%

Source: Claritas, Inc.

Income by Submarket

- Submarkets with the highest percentage of households earning less than 80% of median income are Downtown, Lower O’Callahan Way and Central Lynn. In Downtown 86.3% of households, or 2,357 households, earn less than 80% of median income and 79.5% of households are extremely low or very low-income. In Lower O’Callahan Way 82.6% of households earn less than 80% of median income and 71.9% of households are extremely low or very low-income. 78.1% of households in Central Lynn earn less than 80% of median income and 66.4% of households are extremely low or very low-income.
- Downtown Lynn has the highest number (1,824) of households who are extremely low-income, making less than \$30,000 per year. This is followed closely by Central Lynn where there are 1,770 extremely low-income households.
- Upper Lynnfield/Lynn Woods submarket has the highest median household incomes. An average of all of the median incomes in the block groups within the submarket is nearly \$82,000.

City of Lynn, Submarket Comparison: Low Income Households 2009 (est.) [1]

#	Submarket	Extremely Low-Income (\$0-\$29,999)	Very Low Income (\$30,000-\$44,999)	Low Income (\$45,000-\$59,999)	80-100% Median Income (\$60,000-\$99,999)	> 100% Median Income (\$100,000+)	Average Median Household Income[2]	% of Households That Are Extremely Low or Very Low-Income	% of Households Less Than 80% of Median Income
1	Upper Lynnfield/Lynn Woods	232	171	268	519	721	\$81,913	21.1%	35.1%
2	Indian Ridge	101	90	71	285	241	\$74,391	24.2%	33.2%
3	Fay's Estate	63	43	61	144	168	\$76,923	22.1%	34.9%
4	Lakeside	186	56	45	155	172	\$65,375	39.4%	46.7%
5	Lower Broadway	54	34	61	101	106	\$67,902	24.7%	41.9%
6	Pine Hill	245	216	169	324	237	\$57,538	38.7%	52.9%
7	Parkland Ave	77	96	84	233	116	\$68,693	28.5%	42.4%
8	Lower Boston Street	423	253	224	416	183	\$50,385	45.1%	60.0%
9	Lower O'Callahan Way	257	65	48	55	23	\$22,019	71.9%	82.6%
10	Upper Walnut Street	215	88	107	184	108	\$54,747	43.2%	58.4%
11	Austin Square	262	173	126	260	144	\$50,365	45.1%	58.1%
12	Victory Road	124	26	83	175	84	\$62,596	30.5%	47.4%
13	Chatham Street	401	243	235	387	228	\$52,402	43.1%	58.8%
14	Lynn English	368	235	208	372	147	\$51,278	45.3%	61.0%
15	Agganis Athletic Complex (AC)	297	153	136	257	213	\$54,994	42.6%	55.5%
16	West Lynn	797	361	291	354	197	\$37,779	57.9%	72.5%
17	Eastern Ave	215	153	209	233	138	\$50,619	38.8%	60.9%
18	Kiley Playground	343	142	171	161	97	\$35,588	53.1%	71.8%
19	Fayette Street	822	329	287	298	233	\$37,898	58.5%	73.0%
20	Highlands	1,075	415	349	393	230	\$36,970	60.5%	74.7%
21	Central Lynn	1,770	570	413	537	235	\$32,643	66.4%	78.1%
22	Diamond District	1,142	610	428	629	381	\$44,192	54.9%	68.3%
23	Downtown	1,824	348	185	240	135	\$18,433	79.5%	86.3%
24	General Electric/LynnWay	86	70	46	86	30	\$45,795	49.1%	63.5%
	Total	11,379	4,940	4,305	6,798	4,567		51.0%	64.5%

[1] HUD FY2009 Income Limits Documentation estimates a median household income for the Boston-Cambridge-Quincy HUD Metro FMR Area at \$90,200 for a 4-person household. Extremely Low Income households are determined to be at 30% of the median HH income; Very Low Income at 50%; and Low Income at 80%. Due to availability of data, income ranges are approximated to HUD-defined income limits.

[2] Based on the average of the estimated median household income for each block group in the submarket.

Source: Claritas, Inc.

Housing Characteristics by Submarket

- More than 20% of Lynn’s housing stock is found in Central Lynn and the Diamond District.
- Owner occupancy is found at higher rates in the higher income submarkets. For example, Fay’s Estate has an owner-occupancy rate of 96.6%, while Downtown Lynn’s rate is only 7.9%. In comparison, the city-wide rate is 36.3%.
- Lower O’Callahan and Eastern Avenue submarkets have seen an increase in new construction since 1999. About 9.3% of Eastern Avenue’s housing stock and 7.9% in the Lower O’Callahan submarket was built between 1999 and 2009. In comparison, only about 3% of the city’s housing stock was built in these years.
- Most of Lynn’s housing stock, however, is very old. Pine Hill and Kiley Playground submarkets have the oldest housing stock with 72.5% and 68% of their stock, respectively, being built in 1939 or earlier.

City of Lynn, Submarket Comparison: Housing Characteristics, 2009 (est.)

#	Submarket	Housing Units		Tenure	
		#	% of Total	# of Occupied Units	Owner-Occ. Rate
	City of Lynn	33,445	100%	31989	36.3%
1	Upper Lynnfield St.	1,936	5.79%	1911	95.60%
2	Indian Ridge	805	2.41%	788	85.66%
3	Fay's Estate	485	1.45%	479	96.66%
4	Lakeside	634	1.90%	614	62.05%
5	Lower Broadway	364	1.09%	356	66.29%
6	Pine Hill	1,237	3.70%	1191	55.84%
7	Parkland Ave.	619	1.85%	606	83.99%
8	Lower Boston St.	1,577	4.72%	1499	62.24%
9	Lower O'Callahan	455	1.36%	448	29.24%
10	Upper Walnut St.	710	2.12%	702	61.40%
11	Austin Square	1,004	3.00%	965	55.44%
12	Victory Road	494	1.48%	492	69.72%
13	Chatham Street	1,553	4.64%	1494	61.38%
14	Lynn English	1,405	4.20%	1330	56.84%
15	Agganis AC	1,110	3.32%	1056	53.03%
16	West Lynn	2,161	6.46%	2000	41.80%
17	Eastern Avenue	985	2.95%	948	63.19%
18	Kiley Playground	951	2.84%	914	38.84%
19	Fayette St	2,099	6.28%	1969	33.52%
20	Highlands	2,642	7.90%	2462	27.62%
21	Central Lynn	3,657	10.93%	3525	15.89%
22	Diamond District	3,353	10.03%	3190	32.26%

City of Lynn, Submarket Comparison: Housing Characteristics, 2009 (est.)

#	Submarket	Housing Units		Tenure	
		#	% of Total	# of Occupied Units	Owner-Occ. Rate
23	Downtown	2,866	8.57%	2732	7.94%
24	GE-Lynnway	343	1.03%	318	48.11%

Source: Claritas, Inc.

Lead-Based Paint Hazards

Lead-based paint hazards continue to be a challenge in Lynn and nationally. The U.S. Environmental Protection Agency considers it to be one of the most pervasive developmental toxic substances in the U.S. today.

The presence of lead-based paint hazards is largely a function of the age and condition of the housing stock. Housing built prior to 1980 is likely to contain lead paint. In 1978 a federal ban was instituted on residential paints with greater than one-eighth of one percent lead content. Lead-based paint is a hazard not only if it chips, peels, or flakes, but also if it turns to dust – conditions which occur with greater frequency as housing conditions decline.

As Lynn has a predominantly older housing stock, lead-based paint hazards continue to be a serious problem. The Commonwealth of Massachusetts has estimated that lead-based paint hazards exist in approximately 75% of housing units built before 1980, which would indicate lead paint is present in approximately 23,000 units in Lynn. Data from the Commonwealth indicates that, while Lynn remains designated as a high risk community for childhood lead poisoning, both the number and rate of incidences has dropped since the 2005 Consolidated Plan. The number of five-year cases has declined from 79 to 53:

Childhood Lead Poisoning Data FY 2004 – FY 2009

5-Yr Cases	Rate: Cases X1000	% Low Income	% Pre-1950	Adjusted Rate	% Screened
53	2.2	47%	66%	4.4	87%

Source: MA Health and Human Services

The City of Lynn and LHAND are working to reduce lead-based paint hazards, complying with all legal and statutory responsibilities. LHAND recently received a \$2 million “Healthy Homes” grant to fund a comprehensive Lynn Lead Abatement Program which provides a range of grants and services including: inspections; testing of children under the age of six; de-leading of units, common areas and exteriors; contractor education; and, other services.

Lead Paint in Public Housing

LHAND has aggressively responded to the threat of lead-based paint hazards in public housing. All LHAND family public housing units have been de-leaded. LHAND maintains strict compliance with local state and federal notification requirements. Further, LHAND through briefings, handouts and notices advises participants to maintain communications regarding

elevated blood lead level conditions among household members. In this way, LHAND can respond and make appropriate referrals for families at risk.

Lead Paint in Section 8 Housing

LHAND has developed and implemented strict policies to enforce lead-based paint regulatory requirements. All Section 8 units occupied by children under six years of age require owner de-lead certification prior to approving occupancy. Additionally, owners are required to re-certify units when children are identified with elevated blood lead levels. Through education, briefing and written materials, LHAND actively empowers its tenants to maintain the health and well-being of their families. Owners will be able to participate where eligible in the new Healthy Homes program. LHAND's Section 8 Administrative Plan includes the following policies:

When an assisted family includes a child up to six years old, the landlord is responsible for providing the Authority with a Certificate of Compliance with state and federal lead-based paint removal laws. The Certificate of Compliance can be obtained from a certified de-lead painter or from the Board of Health. Assistance cannot be paid for units occupied by children up to six years of age unless there is a certificate of lead paint compliance on file at the Authority.

If a unit already in the program which had not previously housed a child up to six years old and the owner is now requesting lease approval for a family with a child of that age or younger on the lease, the owner must submit a Certificate of Compliance within 90 days or by the contract renewal date, whichever comes first. If the owner does not provide the required Certificate of Compliance within this prescribed time frame, LHAND may choose to hold or abate rent, or to suspend or terminate the HAP contract.

Massachusetts has enacted model lead-safe measures that are achieving dramatic success. By taking aggressive action to protect its children, Massachusetts has significantly reduced the number of new cases of childhood lead poisoning. This success has been achieved through a comprehensive program that includes tough requirements for property owners, financial assistance, screening and enforcement. Massachusetts requires owners of older housing to protect children under six from lead hazards, and encourages all property owners to maintain lead-safe homes. It offers liability protection to owners who perform essential lead hazard maintenance and provides financial help in the form of grants, loans and tax credits. The state has streamlined bureaucratic processes to make it easier for homeowners to comply with state and federal laws. By mandating that physicians screen children and requiring that insurers pay the costs, Massachusetts has achieved the highest screening rate in the nation. In addition, the number of new cases of lead poisoning in the state continues to decline.

Public Housing Needs and Strategies

The programs and activities of the LHAND are central to the City's program to address low and moderate income housing needs in Lynn. LHAND is the Public Housing Authority for the City of Lynn. In addition, LHAND administers the City's housing related CDBG, HOME, NSP and HOPWA programs. LHAND is also administering two major new grant programs: Healthy

Homes and the Homelessness Prevention and Rapid Re-Housing Program (HPRP). As the City's Public Housing Authority, LHAND:

- Owns and operates 459 federal public housing units.
- Administers 2,354 tenant based rental vouchers including HCV and Family Unification Program vouchers allocated by HUD; HCV vouchers allocated to the Massachusetts Department of Housing and Community Development and administered by LHAND; portable HCV vouchers; and, MRVP, AHVP and Moving to Economic Opportunity vouchers funded by the Commonwealth of Massachusetts.
- Administers 103 Section 8 Moderate Rehab vouchers.

Limitations on funding to fully support these ongoing programs are likely to remain one of the most significant challenges facing LHAND in the coming years. Securing adequate operating funds and capital funding to replace aging building systems at LHAND's family and senior public housing developments remains a top priority.

Over the next five years, LHAND intends to aggressively explore and pursue available funding sources to support capital and operating needs and to expand the supply of affordable housing in the City. This includes exploring the feasibility of securing funding for Curwin Circle, other LHAND developments and/or other new developments projects under the planned CHOICE Neighborhoods Program, HOPE VI, the TIGER initiative, HEARTH and other new funding sources that may become available.

All of LHAND's public housing program initiatives are fully coordinated with the City's Consolidated Plan activities. Part III of the Consolidated Plan includes a copy of LHAND's PHA Five Year Plan and Annual Plan developed in 2010. The PHA Plan identifies a series of broad goals for the agency which have been further developed for purposes of the Consolidated Plan. In its PHA Plan, LHAND notes the relationship of its goals to the level of funding available from the state and federal government. The agency's ability to achieve these goals may be severely impacted by lack of sufficient funding.

Goal 1 – Manage LHAND's existing public housing program in an efficient and effective manner to achieve PHAS High Performer designation from HUD.

- Maintain acceptable levels on the Resident Satisfaction PHAS Indicator including the submission of a follow-up plan.
- Maintain all properties to UPCS standards and receive acceptable inspections in accordance with PHAS.
- Achieve full compliance with all applicable City ordinances and laws, and seek full cooperation from the City in making its properties litter free.

Goal 2 – Continue to identify available federal and state funds to maintain Curwin Circle as an affordable public housing development.

- LHAND may select a development partner and may apply for one or more available federal and state programs to support this objective including, but not limited to, HOPE VI funding, CHOICE neighborhoods, and Low Income Housing Tax Credits.

Goal 3 – Provide high quality tenant and project based rental assistance programs by achieving and maintaining a “High Performer” designation under SEMAP.

Goal 4 – Develop and implement a citywide housing strategy responsive to the broad range of community needs and the special needs population.

- Continue as lead agency of Lynn PACT, a consortium of social service agencies that work collaboratively to provide high quality care to homeless persons and will work to continue to build the Continuum of Care system including coordination of efforts to conform to new opportunities and requirements under the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH).
- Serve as Lead Agency/Fiscal Agent for the State’s Interagency Council on Housing and Homelessness Regional Network Centers Program – in coordination with NSCAP and on behalf of the North Shore Housing Action Group – to prevent homeless families and individuals from entering the shelter system through regional coordination with other North Shore communities.
- Complete an annual GAPS analysis in order to identify the specific needs of the community’s homeless.
- In conjunction with LOECD, LHAND will support efforts to address the priority needs and strategies described in the Consolidated Plan, the recommendations of the Steering Committee to End Chronic Homelessness, and the Analysis of Impediments to Fair Housing.
- Actively participate in the development and implementation of strategies to revitalize the City’s Downtown neighborhood, with a focus on the Washington Street Gateway and Market Street areas.

Goal 5 – Expand affordable housing opportunities - both rental and homeownership - to serve low and moderate-income families and individuals.

- Provide mobility counseling to promote housing choice and help reduce the concentration of voucher holders within its jurisdiction.
- Expand permanent housing options for families and individuals by ten units per year through the Infill Housing Program and various neighborhood revitalization projects.

- Continue to operate the Section 8 Homeownership Program including applying for additional vouchers when available for use as homeownership opportunities.
- Continue to coordinate with DHCD on the Housing First Initiative to provide vouchers and enroll participants in the FSS program.
- Coordinate and encourage regional housing efforts to address the needs of homeless and other special needs populations with a focus on communities that are below the state's Chapter 40B 10% threshold.
- As available, LHAND will apply for additional vouchers to be used for possible relocation efforts and, as available, apply for special purpose vouchers including, but not limited to, Family Unification Program, VASH, Non-Elderly Disabled and other current or newly implemented programs.
- Address issue of higher rents levels paid by other regional PHAs to lease Section 8 units in Lynn.

Goal 6 - Utilize Project Based Rental Assistance.

- Utilize the Project Based Rental Assistance Program in order to expand housing opportunities for low and moderate income families and individuals – including homeless veterans and homeless teens.
- Utilize the Project Based Rental Assistance Program to leverage funds for privately financed housing developments including, but not limited to, the Andrew Street Supportive Housing Project, St. Jean's Neighborhood Revitalization, the YMCA SRO Expansion Project and Bridgewell Group Homes.
- Utilize HCV set-asides for housing initiatives including addressing displacements created by City, LHAND or Non-Profit revitalization efforts; voluntary relocations from overcrowded conditions; displacements due to dwelling fires; Wall Plaza applicants affected by Initial Allocation Plan; Independent Living Center of N. S. and Cape Ann; Housing First Initiative; 33 High St. Veterans Housing; HOPE for Elderly Independence; Normandy Permanent Housing Program; and, other appropriate projects that may emerge in the future.
- Implement other related activities to maintain an acceptable utilization rate for the Housing Choice Voucher Program.

Goal 7 – Identify and secure sufficient funding to continue the agency's present mission and to possibly expand the agency's mission and role in the community given the present financial constraints.

- Continue to maintain operating reserves at a level prescribed by HUD.

- Make diligent efforts to increase or maintain the amount of revenue received from federal, state and local sources to address LHAND’s capital and operating needs and to expand affordable housing options.
- Explore the feasibility of federalizing state public housing developments.
- Develop an increased and positive revenue stream from entrepreneurial housing endeavors.
- Maintain a positive revenue stream from non-housing sources.
- Utilize CDBG, HOME, HOPWA and other available funds as seed money to attract additional public and private capital for the creation of affordable housing opportunities.

Goal 8 – Implement supportive service programs to assist residents to maximize their potential for independent living and/or economic self-sufficiency.

- Continue to operate the Family Self Sufficiency Program for public housing and HCV residents.
- Continue to identify residents in need of services. Whenever possible the LHAND staff will assist the resident in seeking needed services and/or benefits.
- Provide economic opportunities for the youth of Curwin Circle.
- Provide a variety of social, educational and recreational programs and services to all residents.
- Form new partnerships with private sector, non-profits and other stakeholders to increase economic empowerment.

Goal 9 - Fully comply with all applicable provisions of the Violence Against Women Act.

- Serve the needs of child and adult victims of domestic violence, dating violence and stalking, as defined in VAWA, and stated in the LHAND VAWA Brochure, a copy of which is distributed to all program participants.
- Operate programs to serve the needs of child and adult victims of domestic violence, dating violence and stalking as and to the extent such programs are described from time to time in LHAND’s Annual Public Housing Agency Plan.

Goal 10 – Implement Green Technologies and enhance conservation measures at Public Housing sites.

- Fully implement the Energy Performance Contract for Curwin Circle and Wall Plaza that has been approved by HUD.

- Continue to work with DHCD in an effort to implement an Energy Performance Contract for the 667 and 705 State Public Housing programs.
- Pursue other forms of funding through Federal, State and private entities as it becomes available and when appropriate for implementing such upgrades and improvements in Public Housing.

Goal 11 – Make available additional housing options for individuals and families requiring handicapped accessible features.

- Utilize Federal stimulus funds to convert existing units at Curwin Circle and Wall Plaza to accessible units.
- Utilize Federal Capital Funds to convert existing units at Curwin Circle and Wall Plaza to accessible units to achieve a total of 5% accessible Federal subsidized housing units.
- Pursue additional funding through Federal, State and private entities as it becomes available for the conversion/construction of handicapped accessible units of Public Housing, based upon measurable local area need.

Neighborhood Revitalization Strategy Area

The City is not requesting approval of a Neighborhood Revitalization Strategy Area (NRSA); however, it will continue to target resources in the lowest-income urban core neighborhoods. Specifically, the City will focus more intensive efforts in the foreclosure high-risk block groups that are the focus of the Neighborhood Stabilization Program (NSP). Each of these areas has high foreclosure rates, is densely populated and in generally poor physical condition and contain a large inventory of residential buildings that have been subdivided to accommodate additional rental units. The highest risk areas are shown on the following table:

Neighborhood	Census Tract	Block Groups
West Lynn	205500	4
West Lynn	205800	1,2,3
West Lynn	207100	1,2,3
Central Lynn	206000	1,2,3
West Lynn	207000	1,2
Downtown	206900	1,3
Highlands	206800	1,2
Central Lynn	206100	1,3
Highlands	206200	1,2,3,4,5
Fayette Street	206500	1,2,3
General Electric/Lynnway	207200	1,2
Fayette Street	206400	1,3,5
Kiley Playground	206600	2

Barriers to Affordable Housing

As described above, the City of Lynn has a higher percentage of affordable housing units than most of the neighboring cities and towns in the North Shore area, and substantially exceeds the statewide average and the statewide goal under Chapter 40B. The primary barriers to additional affordable housing in Lynn are the high cost of housing in the regional market, the limited availability of land for development, and the aged conditions of a majority of the housing stock. Even with housing prices that are substantially lower than the regional median, the cost of quality housing in Lynn remains too high for many households. See also Analysis of Impediments to Fair Housing for further discussion of needs, priorities and strategies to remove barriers to fair housing choice including ongoing City and LHAND actions.

Anti-Poverty Strategy

Achieving a reduction in the number of families living in poverty remains a key goal of the City and its partners, one which has been made even more challenging because of the recession's impact. American Community Survey updates from 2006-2008 estimate that both the absolute number (n=16,469) and the overall percentage (18.9%) of the population living below poverty level has increased since the year 2000. The highest poverty rate of 26.9% is found among the Hispanic population. The poverty rate of white, non-Hispanic residents is lower (15.1%) than for all other racial/ethnic groups; however, this rate has increased substantially since the year 2000 when it was approximately 12.2%.

It is even more sobering to realize that these dramatic increases in Lynn's poverty level occurred before the full impact of the recession was felt. As of February 2010, Lynn's unemployment rate stood at 10.97%, making it possible that the poverty figures are even higher at this point.

The consequences and costs of poverty are borne not only by individual families, but also by all of the systems in the community including police, health care, schools and other vital institutions. The City has limited resources at its disposal to comprehensively address this issue. Public-private partnerships are essential, as is a more far reaching commitment on the part of the state and federal governments. National and regional economic factors and trends outside of the City's control are likely to have a much greater impact on reducing local poverty. To the extent feasible, the City will work to reduce this percentage by:

- Focusing limited entitlement funds on activities that will leverage substantial additional economic development benefits;
- Continuing to provide housing, economic development and public service opportunities funded through CDBG, HOME, HOPWA and other available grants to low and moderate income households;
- Monitoring and aggressively pursuing existing and proposed federal and state initiatives which offer the potential to address some of Lynn's most pressing issues including both housing and economic development needs. Existing and proposed initiatives which will be assessed and pursued as appropriate include, but are not limited to, CHOICE

Neighborhoods, HOPE VI, TIGER II Discretionary Grants, Housing and Services for Homeless Persons Demonstration, Transformation of Rental Assistance, Sustainable Communities and the Catalytic Investment Competition grants;

- Promoting access to jobs through economic development activities funded by the City;
- Participating in regional partnerships to promote location of new businesses and jobs in the area;
- Supporting existing collaborations between LHAND, TANF administering agencies and the Workforce Investment Board to identify and secure job training opportunities for low income residents, such as the Department of Labor’s YouthBuild Program;
- Supporting Lynn PACT and other agencies in providing job training, employment and other support services to chronically homeless and other special needs populations;
- Providing economic self-sufficiency programs for public housing and Section 8 voucher recipients through LHAND and its partners, such as Compass Working Capital;
- Promoting benefits maximization among low-income households; and
- Facilitating access to services and benefits available to low income households, such as Individual Development Accounts and Earned Income Tax Credits, through collaborations with local agencies who serve low-income populations. An example of such a partnership is SPIN’s Financial Stability Center which provides a wide array of financial literacy, asset building and other services with the support of the United Way.

Strategic Plan Framework for Housing

In light of the enormous unmet need in relation to the very limited amount of available resources, the City has developed a framework for making housing related investment decisions over the five-year term of the Consolidated Plan. Wherever possible, housing activities will be planned and implemented in a manner that helps to support the City’s economic development goals and strategies. Key elements of the framework include:

Develop regional solutions to homelessness and housing for special needs populations to enhance local initiatives.

- Support and actively participate with regional collaborative, such as the North Shore Housing Action Group, to encourage a regional response to housing affordability and homelessness;
- Emphasize homelessness prevention and rapid re-housing;

- Modify local homelessness response systems as needed to coordinate with changes promulgated by HUD pursuant to the HEARTH Act of 2009 and future legislative and regulatory initiatives;
- Work with the Commonwealth of Massachusetts, HUD and other key actors to transition away from shelter models and move towards “housing first”;
- Continue support for permanent supportive housing programs for special needs populations; and
- Increase supply of housing accessible for people with disabilities.

Respond to the needs and opportunities of the current economic recession.

- Focus resources on preventing foreclosures;
- Address the needs of renters who are caught up in foreclosure situations;
- Evaluate the mix of loans and grants to address concerns about homeowners unable/unwilling to take on new debt;
- Pursue new opportunities for funding, acquisition and other strategies to address foreclosure related problems; and
- Encourage consolidation of services.

Strategically manage the growth of Lynn’s residential real estate assets to support the growth of the tax base and healthy neighborhoods.

- Monitor and respond appropriately to new Sustainable Communities initiatives being developed by HUD, US EPA and the US Department of Transportation;
- Continue efforts to encourage and manage new growth while also upgrading the older housing stock. New growth must emphasize the need to create mixed-income housing in order to build the tax base and support a healthy mix of incomes in the community;
- Be strategic in balancing unmet demand of the low-income population with future residential development; and
- Continue efforts through neighborhood revitalization in order to increase owner occupancy, focusing on two and three-family homes, and market rate rental housing for improving the commercial vitality.

Focus on urban core and major redevelopment opportunities.

- Continue efforts to improve housing stock in the urban core through loans, grants, “Healthy Homes” and related programs. Efforts to address pervasive quality of life issues including rodent infestation must be accelerated; and
- Encourage efforts to develop mixed income housing and mixed use development in key target areas including Downtown, Waterfront, Washington Street Gateway and Market Street Gateway.

Preserve existing affordable housing resources.

- Work to preserve existing affordable housing developments with an emphasis on preservation of sites that do not unduly promote concentrations of poverty;
- Support efforts to preserve viability of state-aided public housing resources including, but not limited to, seeking matching funds, federalization and other options; and
- Promote long-term viability of federal public housing including evaluating potential redevelopment of Curwin Circle with HOPE VI, CHOICE Neighborhoods, PETRA and other viable funding sources.

Incorporate green technologies and energy conservation measures into planned development and redevelopment activities.

- Work to preserve the environment while reducing long-term operating costs.

Use zoning as a tool to enhance neighborhood revitalization.

- Density reduction should be studied in certain neighborhoods, and code enforcement and zoning should be reviewed and/or enforced to eliminate substandard development and conflicts;
- Use substandard lots to enhance neighborhood amenities to provide off-street parking, pocket parks, playgrounds and the like;
- Place development restrictions on substandard properties including those that the City may transfer through the tax-title process;
- Evaluate commercial corridors and high traffic roads including those at or near to Lynn’s borders for areas to mitigate encroachment and potential use conflicts and ensure appropriate buffers;
- Phase out incompatible uses over the long term; and
- Consider formulating a comprehensive site design review process.

Use development incentives as a tool to promote neighborhood revitalization.

- Provide density bonuses for market rate housing and commercial development in those submarkets where high-density redevelopment is preferred; and
- Consider establishing a redevelopment fund to spearhead desired projects.

Continue to address the needs of low and moderate income households.

- Expand community-based housing and service models for seniors and people with disabilities;
- Expand housing and services for veterans through VASH and other available programs;
- Provide educational and training opportunities for advancement;
- Provide assistance with home ownership;
- Continue inspectional services to maintain housing standards; and
- Work with outside agencies that administer Section 8 certificates in Lynn to ensure consistent housing standards, fair and comparable rents, and address fair housing related issues.

Priority Housing Needs

Due to HUD's requirements, the City utilized Census 2000 data to complete the following Table 2A. See previous discussion for estimates based on other more recent data including Claritas projections and CHAS updates.

Priority Housing Needs/Investment Plan Table - HUD Table 2A¹

PRIORITY HOUSING NEEDS (households)		Priority		Unmet Need
Renter	Small Related	0-30%		2,110
		31-50%		1,380
		51-80%		1,375
	Large Related	0-30%		650
		31-50%		425
		51-80%		479
	Elderly	0-30%		2,372
		31-50%		825
		51-80%		423
	All Other	0-30%		1,744
		31-50%		1,054
		51-80%		1,058
Owner	Small Related	0-30%		304
		31-50%		394
		51-80%		903
	Large Related	0-30%		123
		31-50%		160
		51-80%		468
	Elderly	0-30%		659
		31-50%		839
		51-80%		864
	All Other	0-30%		384
		31-50%		153
		51-80%		420
Non-Homeless Special Needs	Elderly ²	0-80%		3,505
	Frail Elderly	0-80%		1,405
	Severe Mental Illness	0-80%		na
	Physical Disability	0-80%		2,085
	Developmental Disability	0-80%		na
	Alcohol/Drug Abuse	0-80%		7,416
	HIV/AIDS	0-80%		361
Victims of Domestic Violence	0-80%		2,254	

¹ The primary source of this data is the Comprehensive Housing Affordability Strategy (CHAS) Data Book. The data is current as of 2000. This data is contained in the “Housing Problems Output for All Households” table and is based primarily on the special tabulations of the 2000 Census data available on the HUD State of the Cities Data Systems (SOCDS) CHAS website. This is the only data source that provides the requested data.

² See notes on Non-Homeless Special Needs population in Homeless Strategy discussion.

Priority Needs Summary Table - HUD Table 2A

PRIORITY HOUSING NEEDS (households)		Priority Need Level	Unmet Need	Goals		
Renter	Small	0-30%	High	Affordability gap	Increase household incomes	
		31-50%	High	Affordability gap	Expand housing opportunities	
		51-80%	Medium	Affordability gap	IDAs and down payment asst.	
	Large	0-30%	High	Affordability gap	Promote homeownership	
		31-50%	High	Affordability gap	Renter assistance	
		51-80%	Medium	Affordability gap	Housing preservation Foreclosure (renter assistance)	
	Elderly	0-30%	High	Affordability gap	Renter assistance	
		31-50%	High	Affordability gap	Supportive services	
		51-80%	Medium	Affordability gap	Housing preservation	
	All Other	0-30%	Medium	Affordability gap		
		31-50%	Medium	Affordability gap		
		51-80%	Medium	Affordability gap		
			0-30%	High	Affordability gap	Direct loans
	Owner		31-50%	High	Housing preservation	Elderly Deferred Loans
			51-80%	High	De-leading support	Development Area Grants Foreclosure assistance
Special		0-80%	High	Affordability gap	Permanent housing w/services	

Priority Housing Needs/Investment Plan Goals – HUD Table 2A

Priority Need	5-Yr. Goal Plan/Act*	Yr. 1 Goal Plan/Act	Yr. 2 Goal Plan/Act	Yr. 3 Goal Plan/Act	Yr. 4 Goal Plan/Act	Yr. 5 Goal Plan/Act
Renters						
0 - 30 of MFI	100	20	20	20	20	20
31 - 50% of MFI	100	20	20	20	20	20
51 - 80% of MFI	50	10	10	10	10	10
Owners						
0 - 30 of MFI	50	10	10	10	10	10
31 - 50 of MFI	100	20	20	20	20	20
51 - 80% of MFI	100	20	20	20	20	20
Homeless						
Individuals	715**	143	143	143	143	143
Families	550	110	110	110	110	110
Non-Homeless Special Needs						
Elderly	50****	10	10	10	10	10
Frail Elderly	50****	10	10	10	10	10
Severe Mental Illness						
Physical Disability	25****	5	5	5	5	5
Developmental Disability	25****	5	5	5	5	5
Alcohol/Drug Abuse						
HIV/AIDS	460	92	92	92	92	92
Victims of Domestic Violence						
Total	2,375	475	475	475	475	475
Total Section 215						
215 Renter***	250	50	50	50	50	50
215 Owner	250	50	50	50	50	50

*5 year goals are preliminary estimates that are subject to change. Estimates are based on approximate numbers of households served in recent years.

**Estimates based on existing analysis of homeless population.

***Estimate based on current number of subsidized units in City.

**** This assumes that an estimated 20% of the renters and owners served, as noted above, are elderly or frail elderly and an estimated 10% have a physical disability or developmental disability.

Priority Housing Activities – HUD Table 2A

Priority Need	5-Yr. Goal Plan/Act	Yr. 1 Goal Plan/Act	Yr. 2 Goal Plan/Act	Yr. 3 Goal Plan/Act	Yr. 4 Goal Plan/Act	Yr. 5 Goal Plan/Act
CDBG						
Acquisition of existing rental units	20	4	4	4	4	4
Production of new rental units						
Rehabilitation of existing rental units						
Rental assistance						
Acquisition of existing owner units						
Production of new owner units						
Rehabilitation of existing owner units	15	3	3	3	3	3
Homeownership assistance	35	7	7	7	7	7
HOME						
Acquisition of existing rental units	30	6	6	6	6	6
Production of new rental units	30	6	6	6	6	6
Rehabilitation of existing rental units	126	42	42	42	0	0
Rental assistance	75	15	15	15	15	15
Acquisition of existing owner units	15	3	3	3	3	3
Production of new owner units						
Rehabilitation of existing owner units	100	20	20	20	20	20
Homeownership assistance	100	20	20	20	20	20
HOPWA						
Rental assistance	150	30	30	30	30	30
Short term rent/mortgage utility payments	300	60	60	60	60	60
Facility based housing development	10	2	2	2	2	2
Facility based housing operations						
Supportive services	700	140	140	140	140	140
Other						

8. STRATEGIC PLAN FOR ECONOMIC AND COMMUNITY DEVELOPMENT

The recession has had an enormous impact on the Lynn community. Many available indicators of community economic well-being are trending in the wrong direction, i.e. unemployment has sharply increased; household income has declined in real terms after considering inflation; poverty rates have increased; the number of jobs in the City boundaries has continued to decline; building permit activity has stalled; and, the total value of real estate in the City has declined.

In spite of the recession's impact, the City believes that its fundamental strategic advantages remain strong including proximity to Greater Boston, availability of prime waterfront land and amenities, relatively affordable real estate, and easy access to an international airport and interstate transit routes. As the recession wanes and the economy begins to improve, these economic development advantages will continue to assert themselves, providing a platform for future economic growth. This growth will build on the efforts undertaken in recent years to strengthen the Downtown, to establish an effective Brownfields plan, to plan for major Waterfront redevelopment and to strengthen key gateways including Washington Street and Market Street.

Economic development programs, including investments in infrastructure, offer the potential to generate jobs, increase incomes among low and moderate income households, expand the City's tax revenue base, support vital and safe neighborhoods and leverage substantial private capital. Over the five year period covered by the Consolidated Plan, the City intends to intensify the focus on economic development initiatives as a means to overcome the effects of the recession and promote a healthy and dynamic community.

Economic Development Studies

To prepare the Consolidated Plan, the City reviewed updated economic data and utilized a number of reports and studies:

Economic Development Strategy - The City commissioned a major Economic Development Strategy study that was completed in May 2005 by RKG Associates, Inc. The 2005 Economic Development Strategy study reviewed Lynn's tax base characteristics and land use patterns, and identified eight economic opportunity zones within the City where the supply of nearly all industrial and commercial properties exists. Each of these economic zones face different challenges regarding future economic development due to their location within the City, prevailing land uses, the current build-out nature of each zone, and the transportation network, to name a few. Because Lynn is largely built-out, the redevelopment of selected portions of these opportunity zones is where virtually all future economic development in the City will occur. A series of base maps were prepared to illustrate the potential within each of these zones. Further, the potential to increase the employment base and enhance the tax base within each of these zones has been quantified and the policy options to achieve the goals identified.

While some of the underlying data from the 2005 study has changed, the overall findings and recommendations of this study continue to be valid and have been used to inform the plan for 2011 through 2015. Since that time, other major planning efforts have been undertaken including the Waterfront Master Plan Report (2007), the Open Space and Recreation Plan (2005), Downtown Parking Study, the Washington Street Gateway District Plan (2008) and the Market Street Gateway District Plan (2008).

Waterfront Master Plan - Maximizing the future development potential of the large swath of land abutting the Atlantic Ocean along the Lynnway represents one of the City's most important economic development projects. In 2008, the City completed the "Lynn Waterfront Master Plan" to guide development of a 305-acre development site which is now largely occupied with industrial/commercial uses. Implementation of the Waterfront Master Plan is one of the cornerstones of the City's economic development strategy with the potential to generate hundreds of new construction and/or permanent jobs and substantial new tax revenues. This new plan provides an exciting strategy for future land use including mixed uses (housing, commercial, retail), open space and the development of entirely new City neighborhoods.

Historically, the waterfront land has been utilized for a large variety of industrial uses ranging from active maritime commerce to power generation. The site begins at the General Edwards Bridge and extends north to the intersection of the Lynnway and Market Street, and east along the inner harbor shoreline to the Nahant rotary. The waterfront property is an exceptional site made up of contiguous parcels of land that are severely underutilized. Land of this magnitude in a strategic location along a beautiful waterfront is rare, particularly when it is located within 10 miles of downtown Boston. Its highly desirable location is an untapped asset waiting to be explored and transformed into a higher and better use neighborhood as an expression of Downtown Lynn on the water.

The City applied for a \$5 million Section 108 Loan from the Department of Housing and Urban Development (HUD) to provide loan funding to developers interested in pursuing development opportunities within the City's designated waterfront redevelopment area. Funding may be used for job creation/retention activities, infrastructure improvements, land assembly, site improvements, etc. These funds, coupled with other private and public resources, will create a vibrant new waterfront community while increasing the City's tax base, expanding open space, increasing housing, office space and public access to the waterfront. A critical project milestone was reached in April 2010 with commencement of the relocation of power lines that currently inhibit new development.

Washington Street Gateway - The Washington Street Gateway area focuses on the Lower Sagamore Hill neighborhood along Washington Street, with significant consideration of North Shore Community College and its adjacent areas and Downtown Lynn. Completed in 2008, the Washington Street Gateway Master Plan is designed to address long-standing neighborhood issues while providing recommendations for improving connections with the Downtown and future Waterfront neighborhoods. Major objectives of the Master Plan include:

- Improve the Washington Street corridor;

- Increase real estate investment and development;
- Create connections between Lower Sagamore Hill, North Shore Community College and the Waterfront;
- Replace vacant or underutilized land, low-density development and incompatible uses with moderate-density mixed use development; and
- Encourage transit-oriented development.

Market Street Gateway - As part of a comprehensive approach to neighborhood/economic development planning, the City also completed a study of future development opportunities along the Market Street corridor which extends from Broad Street, up Market to Essex and back down Washington Street to Broad. The eastern boundary of the target area abuts the Washington Street Gateway area, which connects the Downtown to the Lynnway and the beginning of Lynn’s waterfront. Key goals of this initiative include:

- Increase the supply of mixed-income housing options in the Downtown area to provide housing opportunities for Lynn’s workforce, while creating the critical mass needed to support a strong retail and commercial base;
- Connect the Market Street area to the waterfront and create a revitalized neighborhood that offers a diverse group of residents many amenities and a high quality of life;
- Develop a strong planning process and social infrastructure representing all residents and stakeholders of the community that will continue to support the neighborhood as revitalization activities are undertaken; and
- Examine options to acquire properties or eliminate non-conforming uses that are having a negative impact on the neighborhood.

Open Space and Recreation Plan - The Open Space and Recreational Plan provides a comprehensive citywide inventory of open space and recreational resources, including identification of current active and passive recreational uses. The Plan includes recommendations for improvements to a wide range of sites and facilities.

Downtown Parking Study - This study, focusing on improving parking conditions in the Downtown, was completed in July 2007. Recommendations were made to provide the CBD with an enhanced and safer night time appearance, facilitate operational functions such as street cleaning and snow removal, and evaluating the practicality of restricting “night time – overnight” on-street parking within the CBD.

Economic Development Needs

Lynn’s Community Profile underscores the extent to which the recession has exacerbated the three decade long decline of the local economy both in the absolute sense and in relation to the

state and regional economies. While there have been some encouraging recent developments, the community continues to experience disproportionately high rates of unemployment, job losses, and households living below the poverty line and low rates of business expansion, retail sales capture, and commercial tax levies.

In fact, many of the City's challenges and problems related to housing affordability, homelessness, public services, infrastructure, and public safety have their roots in the underlying weaknesses of the local economy. The lack of a strong and diverse local economy with well paying jobs, growing businesses and developable land creates numerous ripple effects that undermine the local housing market, reduce opportunities for Lynn's low and moderate income households, and generate other negative community dynamics.

The City's economic development strategy incorporates findings and recommendations from the studies noted above. It focuses on several major initiatives designed to generate jobs and tax revenues, while building and/or strengthening the housing market in key areas of the City. The process of developing these initiatives has involved hundreds of neighborhood residents, local business owners, developers and other stakeholders. In planning for the next five years, these initiatives represent the highest priority areas for City investment and resource allocation:

Key findings related to employment are summarized below.

- Lynn's population is estimated to have declined by 2,559 between 2000 and 2009. From 2001 to the first quarter of 2009, the number of jobs declined by an even greater number - 2,641.
- The unemployment rate in Lynn as of February 2010 was 10.97%.
- In 2009, Lynn had an employment base of 22,617 jobs, which reflects a 9.36% decline since 2001. In contrast, the number of jobs in the larger North Shore area declined by only 2.8% (n=2,336) over the same time period.
- The long-term reduction in manufacturing jobs - which once provided the foundation of the City's economic health - continued. As of 2009, there were only 4,698 manufacturing jobs in the City, a reduction of 1,423 since 2001. In the larger North Shore area, the decline in manufacturing jobs has been even higher (18.7%) during this period.
- With the exception of information, financial services and real estate, and "other services", the number of jobs in every sector declined from 2005 to 2009.
- The manufacturing (20.7%) and educational/health (36%) sectors combined provide 56.7% of all jobs in Lynn as of 2009. The trade/transportation/utilities sectors provide the next largest percentage of jobs (13.9%).
- Public sector jobs have steadily declined every year since 2002. This sector now represents 4% of Lynn's jobs.

City of Lynn, MA - Establishments, Employment and Payroll Changes: 2001-2008

Year	Establishments	Industry Employment	Construction	Manufacturing	Trade, Transportation, Utilities	Information	Financial Activities & RE	Professional and Business Services	Education and Health	Leisure and Hospitality	Other Svcs.	Public Administration	Payroll (Millions \$)	Average Annual Wage
2001	1,301	25,258	915	6,121	3,509	433	1,210	1448	8216	1391	826	1189	\$1,020.74	\$42,735
2002	1,311	24,976	907	5,781	3,312	373	1,167	1560	8399	1368	883	1224	\$1,040.93	\$42,016
2003	1,352	24,491	971	5,430	3,308	312	1145	1604	8410	1295	919	1097	\$1,078.60	\$44,044
2004	1,396	24,655	1,089	5,130	3,305	275	783	2180	8759	1295	805	1037	\$1,095.58	\$44,460
2005	1,352	24,236	955	5,054	3,329	242	774	2431	8439	1217	791	1003	\$1,108.43	\$45,760
2006	1,339	24,448	760	5,043	3,289	238	1562	2026	8528	1220	783	998	\$1,161.19	\$47,476
2007	1,333	23,024	702	4,972	3,283	236	1539	1495	7776	1215	832	974	\$1,134.58	\$49,296
2008	1,325	22,895	566	5,062	3,177	236	1,493	1514	7839	1213	824	972	\$1,155.43	\$50,492
2009 (2nd QTR)	1,331	22,617	481	4,698	3,144	247	1,421	1514	8157	1159	869	928		\$52,000
2001 - 2008 Change														
#	24	-2,363	-349	-1,059	-332	-197	283	66	-377	-178	-2	-217	135	7,757
%	1.84%	-9.36%	-38.14%	-17.30%	-9.46%	-45.50%	23.39%	4.56%	-4.59%	-12.80%	-0.24%	-18.25%	13.20%	18.15%

Source: MA EOLWD

North Shore WIBA - Establishments, Employment and Payroll Changes: 2001-2008

Year	Estab-lish-ments	Industry Employ-ment	Nat. Res./ Mining	Construc-tion	Manufac-turing	Trade, Trans- portation, Utilities	Informa-tion	Financial Activities & RE	Professional and Business Services	Education and Health	Leisure and Hospitality	Other Svcs.	Public Adminis- tration	Payroll (Millions \$)	Average Annual Wage
2001	5,689	83,235	396	3,889	18,489	16,100	1,479	2356	6777	19167	7001	2261	\$5,320.00	\$2,829	\$34,008
2002	5,846	81,828	431	4,041	17,267	15,777	1,335	2420	6575	19494	7160	2369	\$4,960.00	\$2,811	\$34,372
2003	6,019	80,953	438	4,134	16,654	15,698	1280	2543	6145	19418	7306	2422	\$4,914.00	\$2,846	\$35,152
2004	6,204	81,302	438	4,322	16,238	15,670	1190	2532	6708	19719	7398	2491	\$4,598.00	\$2,976	\$36,608
2005	6,201	81,212	435	4,485	15,417	15,339	1121	2593	7053	19806	7726	2535	\$4,701.00	\$3,013	\$37,128
2006	6,206	81,454	416	4,289	15,480	15,423	1113	2514	7025	20149	7789	2525	\$4,731.00	\$3,104	\$38,116
2007	6,260	81,701	427	4,141	15,415	15,473	1109	2449	7112	20625	7770	2341	\$4,840.00	\$3,208	\$39,260
2008	6,179	80,899	391	3,952	15,035	15,774	1,091	2323	6580	20766	7755	2304	\$4,927.00	\$3,293	\$40,716
2009 (2nd QTR)	6,136	80,154	392	3,365	14,392	15,512	1,013	2308	6267	21661	7957	2370	4916		\$40,924
2001 - 2008 Change															
#	490	-2,336	-5	63	-3,454	-326	-388	-33	-197	1,599	754	43	-393	464	\$6,708
%	8.61%	-2.81%	-1.26%	1.62%	-18.68%	-2.02%	-26.23%	-1.40%	-2.91%	8.34%	10.77%	1.90%	-7.39%	16.42%	19.72%

Source: MA EOLWD

Other key findings related to economic development include:

- The Commonwealth of Massachusetts has placed the Blue-Line extension to Lynn on its 20-year transportation plan. Having this subway link to Boston could improve Lynn's location as an office market destination, especially in conjunction with its waterfront and its close proximity to a labor force and Logan International Airport. The new TIGER II Discretionary Grants program may provide an opportunity to further this important initiative.
- The value of Lynn real estate has been adversely impacted by the recession and changes in its employment base. Overall, the combined valuation of residential, commercial, industrial and personal property has declined by over 22% from \$6.77 billion in 2005 to \$5.25 billion in 2010.
- As noted previously, Lynn has a higher racial and ethnic concentration than the region, and a higher concentration of lower income households, as evident by lower income levels.
- Lynn also has a lower educational attainment level than the region. More than 70% of Lynn's resident workers commuted outside the City for jobs. In conjunction with employment declines, this suggests that the City has become more of a bedroom community than an economic center.
- In 2005, RKG Associates estimated that Lynn lost about \$160 million in retail sales to surrounding communities, and that a potential exists for at least 200,000 SF of new retail space to help recapture a portion of this leakage, provided the "right" locations are created to attract Lynn consumers. Plans for the Waterfront, Market Street Gateway and Washington Street Gateway reflect the potential to recapture these retail sales.
- A resurgence of market rate housing in the downtown has occurred, because of a recent zoning change, and more than 200 units were developed; however, momentum has stalled due to the current economic climate. Over the longer term, changing demographics within the downtown will eventually create new business opportunities for retail, restaurants and personal services.
- A business owner survey conducted in 2005 highlighted the needs for additional parking (58%) and additional land (36%).
- Seventy-eight percent (78%) of survey respondents indicated that "Downtown Revitalization" was a long-term opportunity for the city, and 61% indicated the "Blue-Line extension", while 40% indicated "high-rise development on the Waterfront".

Economic Development Strategy

Based on the Economic Development Strategy study, the City has three basic areas from an economic development perspective on which to focus. These include retention/expansion of existing businesses, the attraction of new businesses to the extent practical, and the redevelopment of existing underutilized parcels and/or buildings within selected zones of the City. While the recession has dampened momentum, each of these approaches is feasible over the longer term:

- *Retention/Expansion:* This involves outreach to existing businesses, the possible relocation of selected businesses within the City, and other forms of assistance, particularly for those businesses that are land-locked and want to modernize, expand or consolidate within the City. Elements of this approach are included in the Washington Street and Market Street plans.
- *Attraction:* The locational attributes of Lynn, coupled with overall trends within the region and the State, suggest that placing significant emphasis on attracting new light industry and/or major office users to the City at this time is not likely to be successful. Instead, the focus should be on encouraging additional market rate housing, where Lynn does have locational advantages, and upgrading the types and quality of retail offerings. This includes not only retail, but also restaurants and selected personal and professional services that typically operate out of storefront locations. This approach is embodied in the Waterfront Master Plan.
- *Redevelopment:* This refers to attracting new major investment within the city to upgrade the low value properties to higher value uses. Redevelopment can be stimulated with zoning changes including density bonuses, as well as participating in site assemblage, helping to secure funding for Brownfield remediation, and forging public/private partnerships to the maximum extent possible.

Lynn is virtually built-out and future economic development should focus on redevelopment of eight major economic opportunity zones throughout the City, where nearly all the commercial and industrial acreage and building area exists. These eight zones encompass about 1,610 acres, or 18% of the City, and generate approximately 25% of the real property taxes. Within these zones, there is a total of 12.2 million square feet (SF) of commercial and industrial properties, of which approximately 1.0 million SF are vacant and/or available for rent or for sale. These zones continue to be the logical areas within which to focus economic development efforts. In addition, the residential assessed values in these eight zones are over significantly lower than the citywide average.

Three major opportunity zones have been identified including those with the highest amount of available or vacant building space in the City.

- *Downtown:* This economic zone accounts for 2% of the acreage in the City and has more than 6% of the building area; however, it contributes 5% of the City's real property taxes. Since most of the commercial and industrial vacancy in the City is within the downtown,

its revitalization will serve to strengthen the current momentum in this zone as well as to enhance the tax base, as assessed values for all property types are below the citywide standards. There are also several Chapter 40B projects in the downtown whose use restrictions may expire within the next seven years. Careful consideration should be given regarding future use of these important affordable housing resources.

Both short and long-term opportunities exist in this economic zone, in addition to what is currently underway. The planned residential project on the waterfront and the possible development of State-owned parcels for office use are two examples. Other long-term opportunities would also exist depending on zoning changes and other policy decisions. Providing density bonuses for new construction, such as allowing 10-story buildings instead of 5-story should be considered. Reducing if not eliminating on-site parking is also recommended given the urban nature of the downtown. Linking the waterfront to the downtown via Market and Broad Street, a key recommendation of the 2005 Economic Development Strategy, is a core part of the Waterfront and Market Street plans.

- *Central Lynn*: This zone is centrally located in the City and is linked by Lynn's street network to four other economic zones. Western Avenue runs diagonally through the zone. Central Lynn encompasses 365 acres, or 4% of the City. More than half of this zone is residential and more than one-quarter is tax-exempt. This zone is developed with 11.3 million SF, or 13% of the building supply in Lynn. The average residential value in this zone is significantly lower than the citywide standard.

Short-term opportunities include the availability of industrial land adjacent to the GE Factory of the Future site, which could be developed as a business park for land-locked employers located elsewhere in the City that need to expand. Other opportunities would also require action such as assemblage of sites at key intersections along Western Avenue as a means to recapture retail spending. Density bonuses should be considered as a means to upgrade the downtown gateway from Lynn Commons onto Market Street, with façade funds and streetscape improvements to strengthen the surrounding residential neighborhoods. In addition, improving residential neighborhood amenities with off-street parking and more green space by removing some of the poor-conditioned and blighted housing stock should be considered and coordinated with revitalization efforts of the Lynn Housing Authority and Neighborhood Development. Additionally, redeveloping assemblages of low valued properties for new low-to-mid-rise buildings could also be considered, as a way to improve the neighborhood and tax base.

- *Lynnway*: This 370-acre zone is situated west of the downtown along the Lynnway and extends between the waterfront and the MBTA corridor. This section represents the greatest long-term opportunity for the City as it contains the largest amount of under-utilized land in the City as evidenced by the floor-area-ratio of 21%. Nearly half the land area is industrial and another 31% is commercial, while residential utilizes 2% of the land area. Residential values are lower in this zone than the citywide standard. Real estate taxes generated from this zone represent 6% of the total real property tax levy.

Zoning is primarily heavy industrial, which is consistent with some of the existing uses such as automotive junk yards, a LNG tank, electric transmission lines and substations, a waste transfer station, a sewer treatment plant, and a former landfill, to name a few. A recent overlay zoning district allowing high-rise residential will assist; however, attaining this type of investment will be a long-term challenge especially in light of the prevailing land uses, Brownfield conditions and Chapter 91 regulations.

The City has taken a major step towards revitalization of this critical area including completion of the Waterfront Master Plan and commencement of the relocation of power lines, which is considered one of the primary obstacles to new development.

Other opportunities have been identified for the remaining zones as described in the study, a copy of which is included with Consolidated Plan materials.

**City of Lynn: Economic Development Strategy
Existing Conditions in the Economic Opportunity Zones**

Economic Opportunity Zones	Acres	% of City	Building SF	% of City	% of RE Tax Levy	Vacant/ Available SF
Downtown	168	1.9%	5,482,870	6.4%	4.9%	441,513
Central Lynn	365	4.1%	11,296,815	13.3%	3.1%	131,884
Lynnway	370	4.1%	3,414,826	4.0%	5.6%	359,790
GE-Riverworks/Western Ave.	247	2.7%	4,850,516	5.7%	1.1%	--
Broad St./MBTA Corridor	150	1.7%	5,848,928	6.9%	2.0%	18,000
Boston St./Western Ave.	187	2.1%	4,713,689	5.5%	6.2%	4,417
Lower Broadway	74	0.8%	1,581,133	1.9%	2.0%	--
Hospital	48	0.5%	591,220	0.7%	0.5%	--
Total	1,608	17.9%	37,779,997	44.4%	25.4%	955,604

Source: City of Lynn Board of Assessors and RKG Associates, Inc. Data as of 2005.

The Economic Development Strategy study also identified a series of suggested goals and outcomes within the opportunity zones which are summarized in the following table.

**City of Lynn: Economic Development Strategy
Potential Increase in Jobs, Housing Units & RE Taxes**

Economic Opportunity Zones	Increase in Jobs		Increase In Housing Units		Annual Increase in RE Taxes in million of \$ (2005)	
	Short-Term	Long-Term [1]	Short-Term	Long-Term [1]	Short Term	Long Term [1]
Downtown	183	1,431	604	1,334	\$1.50	\$3.64
Central Lynn	40	728	27	1	\$0.07	\$0.26
Lynnway	143	4,418	0	1,300	\$0.17	\$8.01
GE-Riverworks/Western Ave.	0	888	0	186	\$0.00	\$0.98
Broad St./MBTA Corridor	0	0	20	20	\$0.04	\$0.04

**City of Lynn: Economic Development Strategy
Potential Increase in Jobs, Housing Units & RE Taxes**

Economic Opportunity Zones	Increase in Jobs		Increase In Housing Units		Annual Increase in RE Taxes in million of \$ (2005)	
	Short-Term	Long-Term [1]	Short-Term	Long-Term [1]	Short Term	Long Term [1]
Boston St./Western Ave.	0	310	54	(5)	\$0.06	\$0.20
Lower Broadway	0	100	0	0	\$0.00	\$0.09
Hospital	0	400	0	(10)	\$0.00	\$0.23
Total	366	8,274	705	2,826	\$1.83	\$13.45

[1] May take 20 years or longer depending on action with redevelopment and includes short term increases. Data as of 2005.
Source: RKG Associates, Inc.

An initial, preliminary budget for potential redevelopment projects in the economic opportunity zones was prepared and summarized in the following table. This budget will need to be refined over time to reflect more accurate information on costs and opportunities. Over the short-term, the preliminary budget as of 2005 was estimated to range between \$2.5 and \$7.4 million to support the economic development strategy. Most of this cost would be incurred in the downtown to stimulate additional revitalization. Over the long-term the preliminary budget was estimated to range between \$75.8 million and \$156.7 million. A large portion of this preliminary budget assumes municipal action in regards to assemblage of properties within the economic opportunity zones for redevelopment, as well as zoning changes and density bonuses.

**City of Lynn: Economic Development Strategy
Preliminary Implementation Budget (in \$ million 2005)**

Economic Opportunity Zones	Short Term Budget [1]		Long Term Budget [1]	
	Low	High	Low	High
Downtown	\$1.50	\$3.50	\$12.70	\$24.90
Central Lynn	\$0.21	\$0.62	\$6.30	\$12.50
Lynnway	\$0.70	\$3.00	\$7.40	\$19.70
GE-Riverworks/Western Ave.			\$30.00	\$59.90
Broad St./MBTA Corridor	\$0.11	\$0.32		
Boston St./Western Ave.			\$14.30	\$29.30
Lower Broadway			\$0.60	\$1.50
Hospital			\$4.50	\$8.90
Total	\$2.52	\$7.44	\$75.80	\$156.70

[1] Preliminary budget includes cost for assemblage, demolition, residential relocation, and other items (See Table 5)
Source: RKG Associates, Inc.

Infrastructure and Community Facility Needs

The City recognizes the importance of continuous investments in order to maintain and enhance the community infrastructure. While precise long-term capital needs for infrastructure and community facilities are not available for all areas, it is clear that these needs dramatically

exceed currently available and projected resources. Based on input from all of the major stakeholders and agencies, the priority needs for the next five years include:

- Improvements to the water and waste water systems. The three year capital improvement plan for the Lynn Water and Sewer Commission calls for \$14.9 million in spending;
- Revitalization of City recreational and park facilities pursuant to the Open Space and Recreation Plan;
- Upgrades to municipal parking facilities to support economic development;
- Road reconstruction, sidewalk repairs and replacements. Lynn DPW's annual expenditures for this work are approximately \$1.15 million;
- Capital improvements for Lynn public buildings. Over \$2 million in various repair work is scheduled for the next year; and
- Upgrades to the Fire Department facilities and equipment.

Infrastructure and Community Facility Strategy

All of the needs identified above will be addressed to some degree over the next five years. Work plans and/or planning studies are underway for each major item. Wherever feasible, planning and implementation activities for infrastructure improvements will be designed to support the community's housing and community development objectives. Funding is from multiple funding sources.

Public Services Needs

For purposes of the Consolidated Plan and CDBG funding, public services include a broad range of programs and services including youth development, senior services, employment readiness and job training, health services, substance abuse prevention, community safety, and cultural diversity.

Lynn has a large low income population with an estimated 18.9% of the total population living below the poverty line. Further, an estimated 29% were born outside of the United States. There are numerous and extensive public service needs that far outstrip the capacity of the City or its non-profit agencies to fully address. Some of the most critical needs include:

- Youth - There are over 13,000 youth in the Lynn school system, the vast majority who come from low income households. A large percentage of these youth are "at risk" for low educational attainment, substance abuse, health problems, and involvement with the criminal justice system. Youth needs have been extensively documented by Lynn agencies and include: educational support; nutrition and health care; HIV prevention; violence and substance abuse prevention; career development; recreational and cultural

support; teen pregnancy prevention; etc. Gang activity and gang-related violence have reportedly been on the increase.

- Seniors – Lynn’s large senior population is also more likely to be low income and/or minority. Lynn seniors face many of the same needs as their counterparts around the county including: health care and nutrition services; access to transportation; home care; and, for frail seniors, access to affordable, assisted living.
- Adults – Lynn’s adult population speaks an estimated 37 different languages. Lynn residents are more likely to be unemployed or underemployed, and to be uninsured or underinsured (for health care). There is an extensive need for services that address both of these needs through job training activities, health care access efforts and the like. Domestic violence issues are also a significant factor for Lynn adults and youth.
- Minority Populations – Again, the Lynn community speaks an estimated 37 different languages and includes a very large minority population. There is a high need to provide open access to educational, job training, health care and other supportive services in a culturally sensitive and appropriate manner.
- Public Safety – The community faces significant, ongoing public safety concerns including substance abuse, high rates of property crimes, and gang violence.

Public Services Strategy

Lynn has an enormous need for public services in relation to the relatively limited resources that are available. The City will continue to work closely with its large non-profit sector, health care providers, educators, police and others to obtain funding to address the most critical service needs, with a focus on prevention. The approach to homelessness prevention and services undertaken by LHAND in partnership with a range of local agencies provides a model for this collaboration. Fortunately, in the area of homelessness and special needs housing, there still exists significant sources of federal funding to support local activities. The City will monitor and pursue if feasible new funding sources such as CHOICE Neighborhoods, the Sustainable Communities initiative, and others that will support a comprehensive approach to housing, economic development and community services.

In allocating public funds, the City intends to continue to emphasize the importance of public-private partnerships so that public funds help to generate additional investments. In light of competing priorities and limited funding, the City will also move to reduce grant funding for public service related capital funding; however, loans will be made available on a limited basis. Further, an increasing emphasis will be placed on achievement by public service subgrantees of measurable outcomes that are consistent with the priority objectives. Key strategic goals for the future include:

- Facilitate educational attainment and healthy development of Lynn youth.
- Establish a Youthbuild or similar project as an alternative to gang activity.

- Promote independent living among Lynn’s seniors and people with disabilities including promoting the provision of in-home services in order to minimize the need for nursing home care.
- Support community policing activities and citizen involvement in creating safe neighborhoods.
- Increase economic self-sufficiency among low and moderate income residents.
- Encourage community involvement and open access to services among Lynn’s diverse minority groups.

**HUD Table 2B
Community Development Needs**

Priority Need	Priority Need Level	Unmet Priority Need	Dollars to Address Need	5 Yr Goal Plan/Act	Annual Goal Plan/Act	Percent Goal Completed
Public Facility						
Parks and/or Recreation Facilities	High	Improve or repair public parks and fields, playgrounds, play areas and other recreational facilities				
Tree Planting	High	Install shade trees				
Infrastructure						
Sidewalks	High	Replacement/repairs of sidewalks and curbs				
Other Infrastructure	High	Construct and repair stairs and walks				
Public Services						
Senior Services	High	Social, educational and recreational activities for seniors Meals for home-bound, frail and isolated elders				
Handicapped Services	High	Activities for individuals with disabilities				
Mental Illness	High	Supportive services for individuals with mental illness				
Youth Services	High	After school and summer recreational activities and educational services for youth, including sports, arts, college preparation training and employment Violence prevention Drug abuse prevention				
Employment/Training Services	High	Education Computer and skills training Job readiness Job training Job placement Career development Internships Community service ESOL, pre-GED and GED preparation classes				
Domestic Violence	High	Supportive services for victims of domestic violence				

Priority Need	Priority Need Level	Unmet Priority Need	Dollars to Address Need	5 Yr Goal Plan/Act	Annual Goal Plan/Act	Percent Goal Completed
Families	High	Activities and programs to strengthen families and family support systems				
Minorities	High	Supportive services for the Haitian American community Supportive services for the Somali community				
Homeless	High	Job training and supportive services for the homeless Meals for the homeless Emergency shelter bed and day program Daily outreach to the homeless				
HIV/AIDS and Veterans	High	Supportive services and advocacy				
Public Security	High	Enhance safety and reduce crime with additional foot patrols				
Economic Development						
Retain and expand existing businesses and jobs/Create new businesses and jobs/ Support downtown revitalization	High	Grants and loans to businesses Support business and employment opportunities Support the growth of small businesses Provide information and guidance to entrepreneurs				

Transition Table 2C
Summary of Specific Housing/Community Development Objectives
(Table 2a/2b Continuation Sheet)

Obj. #	Specific Objectives	Sources of Funds	Performance Indicators	Expected Number	Actual Number	Outcome/ Objective*
	Owner Housing					
1	Increase homeownership opportunities among low and moderate income households	HOME, CDBG	Production of affordable homes Savings accrued through IDA programs Savings accrued through FSS public housing program Homebuyer Assistance loans Second Mortgage program First Time Homebuyer classes			DH-1, DH-2, DH-3
2	Strengthen and revitalize neighborhoods and promote green industry building standards	HOME, CDBG	Homeowner loans and grants to low and moderate income households			DH-1, DH-2, DH-3
3	Develop Foreclosure Prevention Program to include education and neighborhood stabilization activities	NSP	Group & individual counseling, advocacy and refinancing Create a pool of capital for purchasing & rehabbing bank owned properties for resale			DH-1, DH-2, DH-3
	Rental Housing					
4	End chronic homelessness and provide supportive housing programs	McKinney ESG	See Table 1C			DH-1, DH-2, DH-3
5	Preserve and increase affordable housing for low and moderate income households	HOME, CDBG, HOPWA	Rental assistance programs Production of affordable rental units through CHDOs Funding for redevelopment of Curwin Circle Funding to sustain state-aided public housing developments Enforcement of rent reasonableness in all HCV leased units Other preservation			DH-1, DH-2, DH-3

Obj. #	Specific Objectives	Sources of Funds	Performance Indicators	Expected Number	Actual Number	Outcome/Objective*
			activities			
	Economic Development					
6	Retain existing businesses and jobs	CDBG	Number of existing businesses that remain in Lynn Number of existing jobs that remain in Lynn			EO-1, EO-2, EO-3
7	Increase size of existing businesses	CDBG	Number of existing businesses that expand into larger space or increase jobs in Lynn			EO-1, EO-2, EO-3
8	Create new businesses and jobs	CDBG	Number of new businesses that locate in Lynn Number of new jobs created by new businesses			EO-1, EO-2, EO-3
	Neighborhood Revitalization/Other					
9	Encourage Downtown revitalization	HOME, CDBG	Number of new businesses located in Downtown Number of homeowner units located in Downtown Size of Downtown commercial and residential valuation			SL-1, SL-2, SL-3, EO-1, EO-2, EO-3
10	Continued development of the Washington Street and Market Street Gateways	HOME, CDBG	Address zoning issues that hinder development Acquire properties for redevelopment Engage in other targeted revitalization activities			SL-1, SL-2, SL-3, EO-1, EO-2, EO-3
11	Encourage Lynnway/Waterfront revitalization	HOME, CDBG	Number of new businesses located in Lynnway/Waterfront Number of homeownership units located in Lynnway/Waterfront Size of Lynnway/Waterfront commercial and residential valuation			SL-1, SL-2, SL-3, EO-1, EO-2, EO-3
12	Achieve maximum private sector leverage from public investments	CDBG	Public to private leverage ratios			SL-1, SL-2, SL-3, EO-1, EO-2, EO-3

Obj. #	Specific Objectives	Sources of Funds	Performance Indicators	Expected Number	Actual Number	Outcome/Objective*
	Infrastructure					
13	Enhance infrastructure investments to support economic development and housing objectives	CDBG	Infrastructure investments			SL-1, SL-2, SL-3, EO-1, EO-2, EO-3
	Public Services					
14	Facilitate educational attainment and healthy development of Lynn youth and seniors	CDBG	Youth program activities Educational activities Health, substance abuse prevention and other supportive services provided			SL-1, SL-2, SL-3
15	Promote safe neighborhoods	CDBG	Citizens involved in community activities Public safety activities			SL-1, SL-2, SL-3
16	Support community diversity	CDBG	Diversity of citizens participating at community events Provision of translation and other services for non-English speaking residents			SL-1, SL-2, SL-3
17	Promote access to health care services	CDBG	Health care services for low- and moderate-income households			SL-1, SL-2, SL-3
18	Increase economic self sufficiency among low and moderate income residents	CDBG	Completed job training and readiness programs Increased savings through IDA accounts Other self-sufficiency activities			EO-1, EO-2, EO-3
19	Provide supporting housing and/or services for residents	HOME, CDBG, HOPWA, VASH	VASH vouchers and related services for veterans Supportive housing for special needs populations			EO-1, EO-2, EO-3, DH-1, DH-2, DH-3

***Outcome/Objective Codes**

	Availability/Accessibility	Affordability	Sustainability
Decent Housing	DH-1	DH-2	DH-3
Suitable Living Environment	SL-1	SL-2	SL-3
Economic Opportunity	EO-1	EO-2	EO-3

9. STRATEGIC PLAN FOR HOMELESSNESS AND SPECIAL NEEDS

Over the course of the five year Consolidated Plan period, the City intends to build on the existing Continuum of Care strategy to respond to homelessness and special needs populations, while evolving as needed to meet documented community needs in light of the recession's impact, and to respond to new requirements and opportunities presented by the Homeless Emergency Assistance and Rapid Transition to Housing Act (HEARTH) of 2009. The HEARTH Act makes changes to HUD's homeless assistance program and, therefore, to the implementation strategies adopted by the City of Lynn. The Emergency Shelter Grant program administered by the City will now be called the "Emergency Solutions Grant" program. HEARTH Act changes include:

- Homelessness prevention will be significantly expanded. In light of the serious impact that the recession has had on Lynn's housing situation, prevention of homelessness resulting from loss of jobs and foreclosure related activities will be a significant focus of future programming.
- Incentives will emphasize "housing first" and rapid re-housing, especially for homeless families.
- The creation of permanent supportive housing will continue for chronically homeless persons, while expanding this to include chronically homeless families.

HUD has begun to publish draft HEARTH implementing regulations pertaining to the definition of homelessness. As these regulations are finalized, the City will adjust its strategies and priorities as needed to ensure full compliance; however, the general framework for planning and implementation is expected to be sustained. Within the existing CoC framework, emphasis will be placed on implementing additional permanent supportive housing opportunities for families with children and for veterans.

In 2009, the City was selected as a formula grantee under the ARRA-funded Homelessness Prevention and Rapid Rehousing Program (HPRP). LHAND administers this three-year program whose primary goal is the provision of housing stabilization services through temporary financial assistance and/or services to households including those that are at-risk of homelessness. McKinney funding does not allow services to "at risk" families; thus, HPRP provides critically needed funds to help prevent homelessness during a time of extreme economic hardship.

Recognizing the disproportionate response of Lynn to homelessness relative to other regional communities, the City continues to emphasize the need for collaborative regional solutions. Towards this end, LHAND is serving as co-convener of the North Shore Housing Action Group (NSHAG), a network of 24 communities organized into three sub-regions. NSHAG is a major new initiative commenced in 2009. Funding is provided by the Commonwealth's Interagency Council on Housing and Homelessness. Through this regional collaborative, LHAND has begun

to work with other non-Lynn agencies to develop supportive housing opportunities in communities that currently have little or no such housing.

HUD recently released “The 2009 Annual Homeless Assessment Report to Congress”. The report notes that on a national basis, “The continued growth in sheltered family homelessness almost certainly reflects the ongoing effect of the recession....The fragile economic circumstances of the relatives of struggling parents may mean that, as soon as job losses begin in an economic downturn, support networks for families at risk of homelessness fall apart. Doubled-up housing situations cannot be sustained, cash is no longer available to help others with rent payments, and families turn to homeless shelters as the only way of keeping a roof over their heads.” In light of the severe impact that the recession is having on Lynn’s low-income households, the need to provide permanent affordable housing opportunities is greater than ever including focusing on permanent supportive housing options for families.

In addition to expanding the focus on regional homelessness solutions, homelessness prevention, “housing first” solutions and rapid re-housing, the City will continue and expand its efforts to reduce chronic homelessness; provide a continuum of care including emergency shelters, transitional housing, and needed supportive services leading to permanent, quality housing for homeless individuals and families with children; expand the supply of permanent supportive housing options for families with children and veterans; and, address the diverse needs of Lynn’s special needs populations including non-elderly disabled households.

The City’s five-year strategy to address homelessness and special needs populations will build on Lynn’s well developed, coordinated homeless assistance, permanent housing and supportive service systems, while evolving as needed to reflect HEARTH requirements and priorities and to maximize opportunities for regional collaboration through NSHAG. Through its Continuum of Care (CoC) system, the Lynn PACT (People Acting as a Collaborative Team) addresses the specific needs of the homeless subpopulations, including persons with substance abuse issues, veterans, persons with HIV/AIDS, the chronic homeless and others. The Continuum of Care collaborative has successfully assisted hundreds of homeless individuals and families in obtaining services and housing.

In addition to coordinating the City’s housing related programs, Lynn Housing Authority and Neighborhood Development (LHAND) serves as the lead agency for Lynn PACT. As such, it plays a critical role in helping to ensure that existing and proposed federal, state, local and other housing resources are deployed in a cohesive and mutually reinforcing manner. LHAND helps to ensure that new program initiatives such as the Neighborhood Stabilization Program and HPRP, as well as proposed initiatives including new VASH vouchers for veterans, are coordinated with the City’s overall homelessness prevention strategy.

Homeless Needs

Based on available data, the ethnic composition of the City’s homeless population is estimated to be 26% Hispanic and 74% Non-Hispanic. The racial composition of the City’s homeless population is estimated to be 22% Black, 64% White and 14% multi-racial. Table 1A provides information on the estimated size of the homeless population in Lynn including both sheltered

and unsheltered individuals and families with children. It also includes information on the inventory of “beds” available for each group. The information is based on the January 2010 annual point-in-time survey completed by Lynn PACT including a One Night Homeless Census Count and a Housing Activity Survey completed by providers participating in the Lynn PACT system. Note the following information from Table 1A related to the size of the sheltered and unsheltered homeless populations:

- There are an estimated 102 homeless families with children (totaling 283 household members), all of whom were sheltered as of the date of the survey.
- There are an estimated 143 homeless individuals, of which 14 were not sheltered.
- An estimated 110 individuals are considered “chronically homeless”, of which 11 were not sheltered.
- Homeless subpopulations documented in Table 1A include persons with serious mental illness, veterans, chronic substance abusers, persons with HIV/AIDS and victims of domestic violence.
- Within the homeless population, the largest subpopulations are chronically homeless (n=110), chronic substance abusers (n=91), victims of domestic violence (n=35) and persons with serious mental illness (n=18). This underscores the need for intensive housing and supportive services targeted to the needs of these groups.

**TABLE 1A
Homeless and Special Needs Populations**

Continuum of Care: Housing Gap Analysis Chart

		Current Inventory	Under Development	Unmet Need/ Gap
Individuals				
Example	Emergency Shelter	100	40	26
Beds	Emergency Shelter	45	0	
	Transitional Housing	96	0	
	Permanent Supportive Housing	180	0	
	Total	321	0	
Persons in Families With Children				
Beds	Emergency Shelter	242	0	
	Transitional Housing	39	0	
	Permanent Supportive Housing	45	0	
	Total	326	0	

Continuum of Care: Homeless Population and Subpopulations Chart

Part 1: Homeless Population	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Number of Families with Children (Family Households):	97	5	0	102
1. Number of Persons in Families with Children	269	14	0	283
2. Number of Single Individuals and Persons in Households without children	64	65	14	143
(Add Lines Numbered 1 & 2 Total Persons)	333	79	14	426
Part 2: Homeless Subpopulations	Sheltered		Unsheltered	Total
a. Chronically Homeless	99		11	110
b. Seriously Mentally Ill*	18			
c. Chronic Substance Abuse*	91			
d. Veterans	3			
e. Persons with HIV/AIDS	5			
f. Victims of Domestic Violence	35			
g. Unaccompanied Youth (Under 18)				

* Dual diagnosis of mental illness and substance abuse is a significant issue among the population served.

Housing and Shelter Inventory

The Housing Inventory Chart below lists the existing homeless emergency shelter, transitional, and permanent supportive housing resources developed and managed by Lynn PACT agency members. It includes the type of housing, number of units/beds, and the target populations. This chart indicates the following:

- There are a total of 321 beds for homeless individuals including 45 in emergency shelters, 96 in transitional housing and 220 in permanent supportive housing.
- There are a total of 321 beds for homeless families with children including 237 in emergency shelters, 39 in transitional housing and 45 in permanent supportive housing.

Lynn PACT's definition of emergency shelter and transitional housing are as follows:

- **Emergency Shelter Housing** – Temporary in nature, usually meant to be no longer than ninety (90) days. The majority of residents in emergency shelters should be encouraged to return to permanent housing. Local examples of emergency housing are shelters funded by state and federal governments, hospital and mental health short-term placement facilities.
- **Transitional Housing** – Transitional Housing is housing that facilitates the movement of homeless individuals and families to permanent housing. It is housing that can house homeless persons for up to 24 months. The provision of supportive services in conjunction with emergency or transitional housing is important in preparing the individual or family for independent living and permanent housing. Examples of transitional housing include congregate-style living for the disabled that prepare clients for long-term placement in permanent housing, and housing for individuals or family members escaping abusive situations.

In addition to the housing resources listed on the Inventory chart that are specifically targeted to the homeless, the City has a substantial portfolio of other affordable, subsidized housing units and vouchers that serve low-income households who may have been homeless before occupancy and/or would be homeless if these housing resources did not exist. This includes 4,423 project-based subsidized units and approximately 2,350 rental vouchers.

Housing Inventory: Shelters, Transitional, Supportive Housing

EMERGENCY SHELTER					
Provider Name	Facility Name	2009 Year-Round Units/Beds			
		Family Units	Family Beds	Individual Beds	Year- Round
Current Inventory					
Lynn Shelter Association	Emergency Shelter	0	0	45	45
Lynn Shelter Association	Bridge House	11	26	0	26
Serving People in Need	Teen Living Program	11	23	0	23
Serving People in Need	Scattered Sites	77	193	0	193
SUBTOTAL		99	242	45	287
TRANSITIONAL HOUSING					
Provider Name	Facility Name	2009 Year-Round Units/Beds			
		Family Units	Family Beds	Individual Beds	Total Beds
Current Inventory					
CAB Health & Recovery	Grace House	0	0	15	15
CAB Health & Recovery	Ryan House	0	0	32	32
Lynn Shelter Association	Y Initiative	0	0	15	15
Project COPE	Breed Square	3	9	0	9
Project COPE	Women's Residential	0	0	24	24
Project COPE	Rogers Ave	0	0	10	10
Serving People in Need	Amity House	6	18	0	18
Serving People in Need	STEP	6	12	0	12
SUBTOTAL		15	39	96	135
PERMANENT SUPPORTIVE HOUSING					
Provider Name	Facility Name	2009 Year-Round Units/Beds			
		Family Units	Family Beds	Individual Beds	Total Beds
Current Inventory					
Bridgewell	Essex Street	0	0	32	32
Bridgewell	Shelter + Care	4	7	41	48
Lynn Shelter Association	Shelter + Care	4	12	23	35
Lynn Shelter Association	Shelter + Care	0	0	27	27
Project COPE	Newhall Street	0	0	4	4
Project COPE	52 Friend Street	0	0	5	5
Project COPE	195 Union Street	0	0	8	8
Serving People in Need	Andrew St/Normandy	4	8	14	22
Serving People in Need	Shelter + Care	6	18	6	24
Serving People in Need	104 South Common	0	0	7	7
Eliot	Shelter + Care	0	0	3	3
YMCA	YMCA	0	0	10	10
SUBTOTAL		18	45	180	225

Homeless Strategy

In Lynn, the Continuum of Care coalition is known as Lynn PACT (People Acting as a Collaborative Team), with Lynn Housing Authority and Neighborhood Development (LHAND) as the lead agency. The Lynn PACT provider committee meets on a regular basis to design, plan, and coordinate service delivery issues for use of McKinney-Vento-funded grants. LHAND also maintains an internal Supportive Housing Committee that meets monthly to review and coordinate service-delivery issues. Lynn PACT will take the lead in responding as needed to the requirements and opportunities presented by the HEARTH Act of 2009 and any other future legislative/regulatory changes.

Since its inception, the various organizations which comprise the Lynn PACT have built a broad-based and coordinated system of housing resources/supportive services designed to move homeless families and individuals towards permanent housing and economic self-sufficiency. The following section is intended to provide a detailed description of the fundamental services that Lynn PACT member organizations provide in the prevention, outreach, and supportive services to homeless families and individuals. In tandem with the objectives described in Table 1C below, it provides a summary of the strategy to be used to address homeless needs in the City.

Component: Prevention

Existing prevention services and activities that are in place include:

- **Emergency housing assistance** is provided by the Department of Transitional Assistance, which places homeless families in shelters.
- **Housing search assistance** is coordinated by Lynn Economic Opportunity (LEO). As the primary provider of housing search assistance, LEO assists the homeless population in obtaining permanent housing. LEO assists in completion of the housing intake form and the housing application.
- **Emergency shelter and supportive services** are provided by the Lynn Shelter Association (LSA). The Lynn Shelter provides emergency housing to homeless men and women over the age of eighteen. LSA also provides emergency housing for families each night at the Bridge House. Emergency shelter is provided by SPIN and BayRidge Hospital. In addition, Eliot Community Human Services' shelter specialists, working out of the Lynn Shelter, provide supportive services to the homeless population in Lynn. In addition, Eliot Community Human Services' Project for Assistance in Transition from Homelessness (PATH) provides mental health assessment, treatment, advocacy, benefit assistance, DMH referrals, housing assistance and other support services to the adult homeless population.
- **Housing and supportive services for abused women and children** are provided by Help for Abused Women and Their Children (HAWC). Housing for women and children is available at HAWC's shelter, which provides 24-hour staff coverage and advocacy assistance. Supportive services include HAWC's hotline, support groups, legal

advocacy, children's programs, youth outreach programs, outreach programs, community education and the Crossroads hospital program.

- **Job training and employment services** are provided by Bridgewell and Eliot Community Human Services. Services include training in computer skills, instruction in resume preparation and interview skills, and follow-up employment services, including educational and vocational goals assessment and career plan development.
- **Educational services**, including GED preparation, Adult Basic Education (ABE) and English as a Second Language (ESL) are provided by Catholic Charities and by Operation Bootstrap on a referral basis. LSA's Day Program also provides these services.
- **Citizenship classes** are provided by Catholic Charities. Clients are provided citizenship examination preparation, assistance in filling out the citizenship application and locating a testing site.
- **Rental Assistance Programs for youth living on their own** are provided by Lynn Housing Authority & Neighborhood Development based on referrals from the Lynn Public Schools. Generally, rental assistance is provided only through high school graduation.
- **Highland Scholars Project** is a collaboration between the Lynn and Brockton Public Schools, the Department of Transitional Assistance, Department of Housing and Community Development, Department of Elementary and Secondary Education, LHAND and the Massachusetts Coalition for the Homeless to provide time limited rental assistance to eligible families with children attending the Ford School in Lynn and the Huntington School in Brockton along with job training and other educational programs. The goal is to ensure housing stability in order increase educational success.
- **Legal services** are provided to low income and elderly residents by Neighborhood Legal Services and Eliot Community Human Services. Services include elder, employment, family, and housing law, public benefits, and community development. NLS provides legal advocacy to clients for benefit maximization and eviction defense to prevent homelessness. NLS works to ensure that consumers identified as having unutilized entitlement take all necessary steps to acquire the identified benefits, and provide legal advocacy in administrative proceedings as necessary when consumers are denied benefits to which they are entitled. Through the work of NLS individuals are helped to understand their rights, identify illegal barriers to housing access and recognize discrimination. NLS will represent individuals who face illegal housing access barriers to overcome those barriers and acquire the housing desired. NLS will also assist households to secure access to public and subsidized housing resources and provide direct legal assistance to those improperly denied. NLS will also continue to represent homeless individuals and families who are improperly denied access to the emergency shelter system. Through its Tenancy Preservation Program (TTP) Eliot Community Human Services, working out of the Lynn Court provides clinical consultation in eviction cases that are entitled to "reasonable accommodations" due to the presence of a mental

health or physical disability. Eliot Community Human Services clinicians work with the Housing Court to maintain stable housing by assisting tenants with referrals for treatment and support in order to ameliorate the causes of lease violations.

- **HOPE for the elderly vouchers**, offered by the Lynn Housing Authority & Neighborhood Development and Greater Lynn Senior Services, is a voucher program that provides a subsidy to elders living in rental housing.
- **Representative payee services** provided by Bridgewell and Eliot Community Human Services offer money management assistance to homeless individuals who are unable to receive and manage their own funds and have no other suitable person to act on their behalf.
- **Transitional housing and supportive services:**
 - See Inventory chart above for complete listing.
 - In addition to housing, programs provide supportive services, including employment counseling, job training and education services, and assistance in attaining permanent housing.
 - Utilization of the HMIS HousingWorks system at the provider agencies will provide the continuum with an efficient, paperless tracking system to maintain accurate data. This data provides crucial information in the CoC's prevention and outreach efforts.
- **Permanent housing:**
 - See Inventory chart above and also listing of available subsidized housing resources in "Strategic Plan for Housing" section of this Plan.

Families and individuals access/receive prevention assistance through the following process:

- Clients access assistance via the Continuum of Care process. LSA is the central point for the City's CoC. Clients fill out an application and complete the intake process. Each client is assigned a case manager who assesses the client's needs and provides referral information and follow-up. LSA provides transportation services for client appointments when needed by means of a seven passenger van. Client information is maintained by LSA through utilization of the required HMIS database.
- Clients may also access assistance by contacting one of the CoC agencies directly either by phone or in person, through referrals from other PACT providers other than SPIN, or through referrals from social and human services providers in the community.
- The CoC providers maintain close contact with the members of the CoC and other community agencies to maximize outreach to homeless individuals and families. For example, LSA works directly with the other providers of the CoC; a staff member of Bridgewell's Vocational Interest Program (VIP) is on-site at the Multi-Service Center to facilitate referrals and to educate consumers on the services available.

Component: Outreach

Outreach services currently in place for homeless persons including those who are living on the streets include:

- **Street advocates** as well as the City's police department provide outreach to the City's homeless on a daily basis. The street advocates spend time in areas frequented by homeless persons, encouraging utilization of the Day Program and other supportive services. In addition, during the One Night Homeless Census Count homeless persons are informed of the availability of shelters and other supportive services. Outreach is also conducted at the continuum's annual public hearing, which is held to elicit the input of the City's citizens, agencies, community, and business leaders.
- **LSA** is the central outreach point for Lynn's Continuum of Care. It may be accessed through PACT referrals, self-referrals, and street outreach workers. Case managers are available for walk-ins as well as by appointment. While accessing services is encouraged, it is not mandatory.
- **Eliot Community Human Services**, through its Aggressive Street Outreach (ASO) program provides street-based assistance to homeless individuals who live on the streets and rarely or never use shelters. Tangible items such as food and blankets are offered in an effort to build trust while engaging individuals to accept mental health services, benefit assistance, and housing support.
- **PACT providers meet** a minimum of once per month to discuss issues of homelessness. Information is shared and agencies provide updates on referrals, new sources of assistance, and housing lists.
- **PACT agencies perform outreach** and make referrals for their clients. Since the PACT approach is to utilize multiple services, each agency has a working knowledge of community resources and is responsible for documenting referrals. The coordination of the continuum's resources and referrals is conducted by LSA, the lead service provider.
- **Walk-In Clinics** are available at the Lynn Community Health Center, Willow Street Medical Center and the Lynn Shelter Association. Services are offered on an open or self-referral basis. No medical insurance is required and outreach is provided if necessary. The Willow Street Medical Center provides drug testing, AIDS testing and general medical care.
- Staff of Bridgewell's **Vocation Interest Program (VIP)** facilitate referrals and to educate clients about services available through its comprehensive work readiness and job placement program. In addition, VIP staff visit other community agencies to ensure outreach to as many individuals as possible.
- **Utilization of the HMIS HousingWorks system** at the provider agencies will provide the continuum with an efficient, paperless tracking system to maintain accurate data. This data provides crucial information in the CoC's prevention and outreach efforts.

In addition to these existing outreach services, plans call for enrollment clinics sponsored by CAP that will bring together enrollment and outreach staff from the community to conduct high volume enrollment and provide clients with information related to health care access.

Component: *Supportive Services*

Supportive services that are currently in place include:

- **Case management services and needs assessment** are coordinated by LSA. Clients can access meals, telephones as well as transportation, referral, case management services and a daily lunch program. The location at the Multi-Service Center allows clients to access multiple services. For example, clients can participate in programs during the day, proceed to My Brother's Table for dinner, and spend the night at the Lynn Shelter. Utilizing one common application, the CoC providers forward client information to LSA, which acts as the central depository and records the information in case management software. Additionally, as the principal point of coordination for referrals, LSA provides centralized referral services and follow-up through the use of case management software. In addition, Eliot Community Human Services' Project for Assistance in Transition from Homelessness (PATH) provides mental health assessment, treatment, advocacy, benefit assistance, DMH referrals, housing assistance and other support services to the adult homeless population.
- **Legal advocacy services** are provided by NLS to homeless individuals and families many of who have been denied eligibility to emergency shelters and other housing. NLS provides legal advice and representation to families who are threatened with eviction and homelessness, clients with fair housing concerns, and clients with issues relating to domestic abuse, child support, elder law, credit problems, immigration, and shelter regulations. In addition, NLS conducts benefit entitlement screenings of homeless consumers and works in collaboration with agency staff to ensure that consumers identified as having unutilized entitlement take all necessary steps to maximize available benefits. These benefits include TANF, SSI and Social Security, Food Stamps, MassHealth (Medicaid), State Veterans Services Benefits, Emergency Aid To Elders the Disabled and Children (EAEDC – state funded), CommonHealth (state funded health care), Children's Medical Security Plan (Massachusetts SCHIP program), Federal Veterans Benefits, Unemployment Compensation, Fuel Assistance, WIC, Unemployment Medical Insurance, Free Care (state funded health benefit), and refundable tax credits like the EITC. Legal representation is provided in administrative hearings and court proceedings as necessary. NLS also assists the homeless in securing access to public and subsidized housing resources and provides direct legal assistance to those improperly denied. Homeless individuals and families who are improperly denied access to the emergency shelter system receive legal representation from NLS.
- **Job training and employment services** are provided by Bridgewell and Eliot Community Human Services. These services emphasize developing skills that will enable homeless persons to participate in the job market. Services include training in computer skills, instruction in resume preparation and interview skills, and follow-up

employment services, including educational and vocational goals assessment and career plan development.

- **Representative payee services** provided by Bridgewell and Eliot Community Human Services offer money management assistance to homeless individuals who are unable to receive and manage their own funds and have no other suitable person to act on their behalf.
- **Alcohol/substance abuse services** provided by Project COPE assist homeless individuals (English and Spanish speaking) in overcoming their addictions. In addition, substance abuse services are available at Eliot Community Human Services' outpatient clinic in Lynn, which offers individual and group counseling, education and psychopharmacology for individuals, adults and families.
- **Mental health services** are provided by the Department of Mental Health and the Bay Ridge Hospital. In addition, Bridgewell's Lynn Friendship Club offers day services to mentally ill individuals and Eliot Community Human Services' crisis team provides psychiatric evaluation, crisis intervention, stabilization, and follow up.
- **Access to SPIN's Financial Stability Center** is available to help families increase income and savings, and to build assets to become economically empowered. Through the efforts of SPIN and the United Way, the Financial Stability Center offers a range of services including: financial education and budget coaching; IDA savings accounts for home purchase, education or business start-up; volunteer income tax assistance including access to the earned income tax credit; GED, ESOL and literacy courses.
- **Educational Services**, including GED preparation, Adult Basic Education (ABE) and English as a Second Language (ESL) are provided by Catholic Charities and by Operation Bootstrap on a referral basis.
- **Free meal program** is provided by My Brother's Table, which offers free evening meals. Greater Lynn Senior Services also provides a free breakfast program for persons over age 50.
- **Housing search assistance** is coordinated by Lynn Economic Opportunity (LEO). As the primary provider of housing search assistance, LEO assists the homeless population in obtaining permanent housing. LEO assists in completion of the housing intake form and the housing application.
- **Health care services** are provided by Lynn CAP, including health care enrollment and linkages to providers such as the Visiting Nurses Association.
- **Access to communication vehicles** will be offered at Bridgewell through the Voice mail, Internet, Postal mail Program (VIPP). Internet, voice, and e-mail access will be made available. In addition, Bridgewell will provide clients with a physical mailbox for delivery of U.S. mail. Through these communication vehicles, clients will be afforded

the ability to research and make connections to prospective employers, training entities, and other supportive service providers.

Chronic Homelessness

Chronically homeless individuals face barriers to obtaining housing because of mental illness and substance and/or alcohol abuse. Oftentimes, these clients do not follow through with referrals and treatments and refuse to accept available services. Other barriers include reductions in funding for existing programs and shortages of mental health, legal and substance abuse services.

In November of 2005, a broadly representative group of community leaders was convened to develop a plan to end chronic homelessness in Lynn, Massachusetts. The group, known as the Steering Committee to End Chronic Homelessness (“the Steering Committee”) included representatives from the business community, Lynn’s neighborhoods, government, law enforcement, health care, housing and supportive service providers. In tandem, Lynn PACT established a Chronic Homeless Focus Group.

Over a seven-month period, the Steering Committee convened meetings and strategy sessions, conducted research into Lynn’s needs, identified gaps and weaknesses in the current service delivery system, and assessed local and national “best practices”.

The group’s efforts were also directed at recognizing the need for an individualized approach in providing supportive services to the chronic homeless population. In recognizing the high incidence of alcohol and substance abuse and mental illness among the chronic homeless population, Lynn PACT provides outpatient counseling services to address these obstacles. In addition, the group reached out to other service providers in an effort to incorporate the most effective methods for combating chronic homelessness. In the past, Lynn’s emergency shelter has been utilized by the chronic homeless as a permanent residence. To reverse this practice, a street advocate noted above, working in cooperation with LSA, will aggressively target the chronic homeless to transition them out of the shelter system and into transitional and permanent housing.

The Steering Committee developed a series of goals for addressing chronic homelessness which the City and Lynn PACT member agencies will continue to work towards over the five-year period covered by the Consolidated Plan:

1. Enhance coordination between service providers, mental health experts, and the criminal justice system.
2. Expand availability of mental health services and long term substance abuse services for chronically homeless individuals.
3. Improve coordination and implementation policies at the Multi Service Center and other emergency shelters to discourage substance abuse and public nuisance activities.

4. Sustain existing network of affordable housing and supportive services, while engaging regional communities in meeting future demands.
5. Involve state and federal government directly in regional efforts to minimize and end chronic homelessness.
6. Coordinate services between Lynn PACT and North Shore HOME Consortium to regionalize services within 30 communities located throughout Essex County.
7. Implement a pilot permanent housing program for 10-15 chronically homeless individuals.

Discharge Coordination Policy

In addition to the specific priorities described above, the Steering Committee on Chronic Homelessness reviewed data on who is actually using homeless services in Lynn and determined that many clients come from other communities in Massachusetts and from around the country. The City of Lynn does not decide who will locate in this community. Neither does it control the flow of needy, potentially homeless individuals who are discharged every day from correctional, mental health, foster care and other public and private systems.

In recognition of this fundamental issue, the Steering Committee proposed the creation of a Discharge Coordination Policy focused on involving state and federal government agencies, along with other neighboring communities, in responding to the crisis of chronic homelessness. Recommended actions include:

- Establishing a Single Point of Contact (SPOC) for discharge coordination. The SPOC can be an important part of efforts to plan for appropriate housing and supportive services for families and individuals who are about to move into Lynn.
- Mandating discharge planning coupled with the provision of adequate housing and case management resources by state and federal discharging agencies. While the SPOC concept will assist in responding to imminent moves to the City, it is equally important that discharging agencies provide discharge planning resources so that the financial burdens do not shift directly to Lynn and other local communities.

Since the Steering Committee's recommendations were published in 2006, LHAND has assumed the role of co-convenor of the regional North Shore Housing Action Group (NSHAG). As noted above, NSHAG provides a forum for joint planning among 24 regional communities to develop supportive housing opportunities in communities that currently have few or no such resources.

Hospitals are required to prepare and publish discharge policies, which are reviewed by Lynn PACT members. Lynn PACT presently coordinates the Continuum of Care process with the Commonwealth of Massachusetts' discharge policies and guidelines. The Commonwealth has developed and continues to develop policies to prevent individuals who are discharged from institutions and health care facilities from becoming homeless. One of the ways in which the

Commonwealth provides for appropriate discharge planning across programs is the inclusion of discharge specifications in its contracts. The State's Operational Services Division, the agency responsible for overseeing the Massachusetts Purchase Service system, has developed planning specifications for the procurement of services. Its goal is to ensure consistency in discharge planning among vendors and to establish an effective discharge planning policy and system statewide.

Individual departments of the Commonwealth have worked to ensure appropriate discharge planning internally as well. Since 1983, the Department of Mental Health, for example, has adhered to an inpatient discharge planning policy that includes housing search among other measures, and is explicitly aimed at preventing homelessness. The policy prohibits DMH state hospitals and community mental health centers from electing to discharge clients from inpatient units with directions to seek housing or shelter in an emergency shelter. It directs staff to make every effort to place clients in suitable, affordable housing coupled with clinically appropriate services.

The Department of Corrections has developed system-wide policies and practices to encourage the discharge of offenders to appropriate housing or placements. As soon as an offender enters the corrections system, a needs assessment is conducted. This assessment forms the basis for the study and work the individual will do while incarcerated to prepare the individual for a successful discharge. One year prior to release, offenders attend a transition workshop; the workshop addresses all aspects of the transition back into the community including housing. Prior to release, the individual's transition plan is reviewed by a multi-disciplinary team. A case manager facilitates the transition to a Community Resource Center once the individual is released. Many resources are offered to ex-offenders; whether or not the individual avails themselves of these resources is determined by the individual alone unless the individual is under supervision after incarceration.

The Department of Children and Families (DCF) is in the process of reviewing its discharge planning policies to improve discharge planning from foster care and other youth facilities. The draft Permanent Planning Policy recommends changes to discharge planning, reinforcing Foster Care Review staff's involvement in focusing all involved with youth on planning for discharge and/or accepting a VPA to remain in custody until age 18. The agency has a Discharge Support Program that provides youth leaving DCF without returning home or being adopted, up to \$1,500 in funds to pay for housing and related expenses. The agency also has each youth meet with an outreach worker to assist with discharge planning, including the completion of a Mass Health application. Youth leaving DCF also receive a Leaving Care packet that includes a Discharge Guide, a \$50 gift card to a grocery store in the appropriate area, \$25 phone card and a \$50 gift certificate to a clothing or department store.

The City and Lynn PACT will continue to work with NSHAG, health care, corrections and other agencies and institutions to improve discharge policies and to coordinate activities in order to reduce instances of homelessness associated with poorly planned discharges.

Special Needs (Non-Homeless) Populations

Table 1B provides estimates of need for non-homeless, special needs populations. Note the following data sources and assumptions used:

- Unmet needs for Elderly households are estimated to be 3,505 based on the updated CHAS tables showing the number of elderly households with housing problems (i.e. substandard, overcrowded, severely overcrowded, no income or no cash rent, cost burdened or severely cost burdened). Primary needs for this group include rental assistance, home repair loans and grants (for elderly homeowners), home care and health care, transportation, and nutrition.
- Unmet needs for the Frail Elderly households are assumed for this purpose to be the “extra elderly” households with housing problems on the updated CHAS tables. Note that these households represent a subset of the overall elderly household total. Primary needs for this group include rental assistance, home repair loans and grants (for elderly homeowners), home care and health care, transportation, and nutrition. The need for community-based health care is acute among this group in order to reduce the need for nursing home care.
- Unmet needs for Physically Disabled households are also derived from updated CHAS tables listing the number of disabled households with housing problems. In addition to rental assistance or home repair assistance (for homeowners), low-income persons with physical disabilities need accessible housing facilities and community-based health care.
- An estimate of persons with alcohol/other addiction problems is based on tripling the number of admissions that were reported by the Massachusetts Department of Public Health, Bureau of Substance Abuse Services (BSAS) to BSAS-contracted treatment programs in FY2007. Due to the pervasive nature of drug and alcohol problems nationwide, this is likely to be a conservative estimate.
- Estimates of the HIV/AIDS population are based on the Massachusetts Department of Health, HIV/AIDS Surveillance Program Quarterly Report as of 7/1/2008. In 2006, the AIDS Housing Corporation completed an “Essex County Housing Needs Assessment” which is subtitled “Housing is Health Care”. The report indicates that the “...greatest and most obvious need is the need for permanent, affordable housing.” The report’s recommendations included: increase the affordable housing stock; preserve existing housing resources; increase housing advocacy resources; and, encourage community collaboration.
- Estimates of the number of Victims of Domestic Violence are based on FY 2009 information provided by Help for Abused Women and their Children (HAWC).

**Table 1B
Special Needs (Non-Homeless) Populations**

SPECIAL NEEDS SUBPOPULATIONS	Unmet Need	Dollars to Address Unmet Need*	Multi-Year Goals	Annual Goals
Elderly	3,505	\$36,466,020	50	10
Frail Elderly	1,405	\$14,617,620	50	10
Severe Mental Illness	Not available	Not available		
Developmentally Disabled	Not available	Not available	25	5
Physically Disabled	2,085	\$21,692,340	25	5
Persons w/ Alcohol/Other Drug Addictions	7,416	\$7,416,000		
Persons w/HIV/AIDS	HIV – 161 AIDS – 200 TOTAL – 361	\$3,755,844	460	92
Victims of Domestic Violence	2,254	\$2,254,000		
TOTAL	17,026	\$86,201,824	610	122

*Accurate projections of the dollar amount needed to address the unmet needs of these populations are not available. For this purpose, the City has estimated the annual housing costs for housing the elderly, frail elderly, physically disabled and persons with HIV/AIDS in decent, safe and sanitary housing using 75% of the current HUD fair market rent for a 1-bedroom unit, i.e. \$867 per month or \$10,404 per year. For planning purposes an estimate of \$1,000 has been budgeted per person for the other subpopulations (persons with alcohol/other drug additions and victims of domestic violence).

Priority Needs and Strategy

The City’s priorities related to homelessness and special needs populations are based upon the work of Lynn PACT agency members, information provided by other service agencies, and the needs data summarized in Tables 1A and 1B. These priorities, and the City’s overall strategy, focus on addressing the gaps in housing and supportive services, and reflect a continued commitment to provide outreach and assessment to homeless individuals and families by identifying their needs and making connections to facilities and services.

Lynn PACT’s strategy is based on the idea that issues surrounding homelessness are best addressed through the coordination of services and by accessing different social service providers that specialize in one particular field, rather than having one agency try to meet all of the needs of the homeless population. Accordingly, the objectives reflect the continuum’s policy of facilitating the movement of clients through the CoC and ensuring that supportive services and housing are provided to homeless individuals and families in an effective and efficient manner.

- Continue to work with regional communities through the North Shore Housing Action Group to implement regional solutions to the homelessness problem, including encouraging development of supportive housing resources throughout the region.
- Work with the Commonwealth to transition from a shelter model to a “housing first” approach.
- Reduce and ultimately end chronic homelessness.

- Create additional permanent housing, job training, employment and supportive service opportunities for the chronic and other homeless populations.
- Facilitate access to housing, health care, nutrition and other supportive services for persons with HIV/AIDS using HOPWA and other available funds.
- Facilitate access to home care, nutrition, housing, transportation, recreation, and medical services for seniors and non-elderly disabled households.
- Apply for VASH and other available vouchers that can be combined with supportive services to address the needs of veterans and other sub-populations.
- Facilitate access to emergency services, counseling, support and permanent housing services for abused women and their children.

Summary information on the City's priority homeless and special needs populations objectives are contained in Table 1C below. These objectives will continue to be refined and modified in the future to reflect changing community needs and priorities, as well as new funding opportunities and federal/state requirements. Note also that accomplishment of these objectives is dependent on receipt of adequate funding to sustain existing programs and to create new permanent supportive housing opportunities.

Table 1C
Summary of Specific Homeless/Special Needs Objectives
(Table 1A/1B Continuation Sheet)

Obj #	Specific Objectives	Sources of Funds	Performance Indicators	Expected Number (5 year)	Actual Number	Outcome/Objective
	Homeless Objectives: Chronic Homeless					
1	Reduce the overall rate of chronically homeless individuals	McKinney ESG Other	a) Reduction in number of individuals who remain continuously homeless for 1 year, or have at least four episodes of homelessness during a 3-year period			DH-1 SL-1
2	Create additional permanent housing opportunities for the chronic homeless population.	McKinney CDBG VASH Other	a) Increase in number of new permanent housing beds for chronically homeless persons including 10-15 unit pilot			DH-1 DH-2 SL-1 SL-2
3	Provide supportive services to the chronic homeless	McKinney VASH Foundation Other	a)Percentage/number of chronically homeless persons utilizing service and treatment programs			SL-1
	Homeless Objectives: Other Homeless					
4	Create additional permanent housing opportunities for families	McKinney CDBG Other	a)Percentage/number of permanent housing beds for homeless families with children b) Decrease in number of homeless families with children			DH-1 DH-2 SL-1 SL-2
5	Provide coordinated referrals and case management services to the homeless population	McKinney State Foundation	a)Percentage/number of homeless families and individuals receiving services			DH-1 SL-1 EO-1
6	Provide housing search services to assist the homeless population in obtaining permanent housing	McKinney State Foundation	a)Percentage/number of homeless individuals who have moved from emergency or transitional to permanent housing			DH-1 DH-2 SL-1 SL-2 EO-1
7	Provide job training and employment related services	McKinney Other federal State	a)Number/percentage of homeless adults placed in jobs or job training programs			EO-1
8	Provide emergency and transitional housing and services to homeless populations	McKinney ESG State Foundation	a) Transitional beds/shelters with supportive services for individuals b) Transitional beds/shelters with supportive services for families c) Emergency beds/shelters for homeless families with children d) Emergency shelters for homeless individuals			DH-1 DH-2 EO-1
	Special Needs Objectives					
	Elderly and Frail elderly:					

Obj #	Specific Objectives	Sources of Funds	Performance Indicators	Expected Number (5 year)	Actual Number	Outcome/Objective
9	Facilitate access to home care, nutrition, housing, transportation, recreation, and medical services for seniors	CDBG Other federal State Foundations	a)Number of affordable housing units, homemaking, nursing, transportation and personal care services provided to seniors with need			SL-1 EO-1 EO-2
10	Prevent foreclosure of low-income elderly homeowners and eviction due to foreclosure actions of elderly renters	NSP Other	a)Number of foreclosure prevention counseling and referrals provided			DH-2
	Persons with HIV/AIDS					
11	Facilitate access to housing, health care, nutrition, and other supportive services to persons with HIV/AIDS	HOPWA McKinney Other	a)Number of affordable housing units, healthcare and supportive services provided to persons with HIV/AIDS			
	Other: Abused Women and Children					
12	Facilitate access to emergency services, counseling, support and permanent housing	McKinney ESG Other	a)Number of permanent housing beds/shelters for abused women and their children			DH-1 DH-2 SL-1 SL-2 EO-1

***Outcome/Objective Codes**

	Availability/Accessibility	Affordability	Sustainability
Decent Housing	DH-1	DH-2	DH-3
Suitable Living Environment	SL-1	SL-2	SL-3
Economic Opportunity	EO-1	EO-2	EO-3

10. PERFORMANCE MONITORING

The City of Lynn is the grantee for CDBG, HOME, HOPWA and ESG funds. Planning and administration of all non-housing activities including economic development, community development, public services, infrastructure and community facilities is the responsibility of the City's Office of Economic and Community Development (OECD). LOECD directly administers economic and community development programs and provides oversight and monitoring for sub-recipients of non-housing funds. LOECD collects information from LHAND and manages the overall HUD reporting systems to ensure that all funds are obligated and expended in a timely manner.

Planning and administration of all housing related activities funded through the formula programs is the responsibility of the Lynn Housing Authority and Neighborhood Development (LHAND). LHAND, which is also a sub-recipient, directly administers housing programs and provides oversight and monitoring for sub-recipients of housing funds. LHAND is also the Public Housing Authority for the City of Lynn, administering federal and state public housing, voucher and related programs.

LOECD and LHAND negotiate formal, performance-based contracts with all sub-recipients:

- Performance-based contracts include specific performance goals related to the City's Consolidated Plan and Annual Plan strategic objectives.
- Performance-based contracts include reporting requirements related to participation rates and low-moderate income household participation.

LOECD and LHAND monitor and collect data on sub-recipient performance:

For sub-recipients of HOME and CDBG housing funds, LHAND conducts periodic program reviews and collects data on household profiles, participation rates and low/moderate income benefit levels. Reports are carefully reviewed by senior staff. As required, follow up to resolve issues is conducted. A similar approach is used to monitor performance of agencies receiving HOPWA funds administered by LHAND.

For sub-recipients of ESG and non-housing CDBG funds, LOECD conducts annual evaluations at the sub-recipient's site. It includes a site and facility tour and interviews with program staff. LOECD also collects quarterly data on household profiles, participation rates and low/moderate income benefit levels. The City's policy is to count individuals served by a specific agency only once each year.

11. ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING

Introduction

The Lynn Housing Authority & Neighborhood Development (LHAND) has prepared this Analysis of Impediments to Fair Housing Choice (AI) as part of the 2010 Consolidated Plan and Annual Plan process. Since 1998, in addition to its role of administering state and federal public and leased housing programs, LHAND has coordinated the planning and implementation of the City's housing-related CDBG, HOME, ESG and HOPWA funds. This report includes data from the 2006-2008 American Community Survey (ACS), the 2009 Comprehensive Housing Affordability Strategy (CHAS), Claritas, the 2000 US Census, and other data sources. In addition, it includes information gathered in 2010 from local, state and federal government agencies, housing providers, legal services and advocacy groups. Please note that the terms impediment and barrier are used interchangeably in this report.

Background

Pursuant to the Consolidated Planning rules issued by HUD in 1995 and 1996, the City is required to certify that it will affirmatively further fair housing choice. The City included this certification in the 1995, 2000 and 2005 Consolidated Plans and in previous CHAS and CDBG submissions made by the City to HUD. HUD's final guidelines included the specific requirements related to the Affirmatively Further Fair Housing certification (AFFH), which include completion of an Analysis of Impediments (AI) study, taking appropriate action to overcome impediments to fair housing choice and maintaining records to support the AFFH certification.

Methodology

LHAND utilized the services of a contractor to assist in preparing the Analysis of Impediments. The preparation of this document involved a review and update of existing documents, studies, and statistical profiles including:

- City of Lynn Action Plan FY 2009;
- 2006-2008 American Community Survey (ACS);
- 2000 US Census of Population and Housing;
- Claritas Demographics;
- Information gathered through focus groups and surveys as part of the 2010 Consolidated Plan process;
- Comprehensive Housing Affordability Strategy;

- HUD Fair Housing Planning Guide;
- LHAND Admissions and Continued Occupancy Policies;
- LHAND Resident Demographic Statistics;
- *“National Fair Housing Alliance: A Step in the Right Direction, 2010 Fair Housing Trends Report”* – May 2010;
- *“The Changing Face of Massachusetts”* – June 2005;
- *“Population Growth and Change in Massachusetts”* – May 2008;
- *“The Gap Persists: A Report on Racial and Ethnic Discrimination in the Greater Boston Home Mortgage Lending Market”*, Fair Housing Center of Greater Boston – May 2006;
- *“You Don’t Know What You’re Missing: Realtors Disadvantage African American, Latino Homebuyers”*, Fair Housing Center of Greater Boston – October 2005;
- *“Discrimination in the Lowell and Merrimack Valley Rental Markets”*, Fair Housing Center of Greater Boston – December 2004;
- *“Acceso negado/Access denied: Discrimination against Latinos in the Greater Boston Rental Market”*, Fair Housing Center of Greater Boston – April 2002; and
- *“We don’t want your kind living here...”* Fair Housing Center of Greater Boston Report on Discrimination in the Greater Boston Rental Market – April 2001.

In addition to reviewing and analyzing the reports listed above, the following agencies were contacted to request information and solicit feedback on fair housing related issues:

- Massachusetts Commission Against Discrimination;
- United States Department of Housing and Urban Development – Office of Fair Housing;
- The Independent Living Center of the North Shore;
- Commonwealth of Massachusetts, Department of Mental Health;
- Massachusetts Office on Disability;
- Neighborhood Legal Services;
- The Disability Law Center; and
- Fair Housing Center of Greater Boston.

Commitment to Affirmatively Further Fair Housing

The City of Lynn, Massachusetts and the Lynn Housing Authority & Neighborhood Development are committed to the goals of eliminating discrimination in housing and affirmatively promoting fair housing choice for all citizens regardless of race, color, religion, sex, disability, familial status or national origin. Further, the City and LHAND, which administers all CDBG, HOME, HOPWA, Public Housing and Section 8 housing-related programs in Lynn, are committed to the goal of integrating fair housing planning efforts into the City's overall housing and community development Consolidated Planning process. In the implementation of all activities covered under the Consolidated Plan for Housing and Community Development, the City and LHAND intend to affirmatively promote housing choice and to comply with all legal and statutory responsibilities with respect to fair housing including the provisions of the Fair Housing Act, the Housing and Community Development Act of 1974, the National Affordable Housing Act of 1990, HUD Consolidated Planning and other pertinent regulations.

The City of Lynn, Massachusetts and the Lynn Housing Authority & Neighborhood Development are working and will continue to work to:

- Overcome the effects of impediments or barriers to fair housing choice;
- Remedy discrimination in housing; and,
- Promote fair housing rights and fair housing choice.

The City and LHAND will take the following specific actions to promote fair housing rights and fair housing choice:

- Work to increase the supply of affordable housing for low income households, including minority and disabled households, through vacancy reduction and modernization activities subject to funding availability;
- Collaborate with local agencies to expand other rental and homeownership opportunities for low and moderate-income households including households with disabilities;
- Provide applicants and program participants with required information and notices relative to fair housing rights and anti-discrimination laws;
- Operate in a non-discriminatory manner; and,
- Support other local efforts to affirmatively further fair housing.

LHAND has experience with creating affirmative marketing procedures and requirements for rental and homebuyer projects and understands that the jurisdiction is responsible for developing procedures for any HOME funded project containing 5 or more units.

The project specific affirmative marketing requirements and procedures will include:

- Methods for informing the public, owners and potential tenants about Federal Fair Housing Laws and LHAND's affirmative marketing policy such as the use of Equal Housing Opportunity logotype or slogan in press releases and solicitations for owners as well as written communication to fair housing and other groups;
- Requirements and practices each owner must adhere to in order to carry out LHAND's affirmative marketing procedures and requirements such as the use of commercial media, use of community contacts, use of Equal Housing Opportunity logotype or slogan and display of fair housing poster;
- Procedures to be used by owners to inform and solicit applications from persons in the housing market area who are not likely to apply for the housing without special outreach such as use of community organizations, places of worship, employment centers, fair housing groups or housing counseling agencies;
- Records will be kept describing actions taken by LHAND and by owners to affirmatively market units and records to assess the results of these actions; and,
- A description of how LHAND will annually assess the success of affirmative marketing actions and what corrective actions will be taken where affirmative marketing requirements are not met.

Minority Outreach Program

LHAND is committed to implementing a minority outreach program to ensure the inclusion, to the maximum extent possible, of minorities and women, and entities owned by minorities and women, in order to facilitate the activities of LHAND to provide affordable housing authorized under the HOME or any other Federal housing law applicable.

LHAND's minority outreach program includes:

- Placing qualified small and minority businesses and women's business enterprises on solicitation lists;
- Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources;
- Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority business, and women's business enterprise;
- Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority business, and women's business enterprise;

- Using the services and assistance of the Small Business Administration, and the Minority Business Development Agency of the Department of Commerce; and,
- Requiring the prime contractor, if subcontracts are to be let, to take the affirmative steps listed above.

Citywide Demographic and Housing Market Issues

The studies referenced above provide updated housing, demographic and economic data pertinent to the 2010 Consolidated Plan and future housing and community development planning efforts. Key information from these studies includes the following:

- *Lynn's minority population has grown significantly and represents over 40% of the City's population.* Lynn represents a diverse population with a minority population of 42.6%, nearly two and a half times the statewide percentage of 17.3%. Although the City's total population declined since 2000 by nearly 3% or about 2,500 people, the minority population increased by 29% or more than 8,000 individuals. The City's minority population increased from 16.9% of the total City population in 1990 to 32.1% in 2000, and an estimated 42.6% in 2009. The African American population is estimated to have increased 77% since 1990 and the Hispanic population has increased 217%, with a 44% increase since 2000. The City's Hispanic population is more than three times the statewide average and now represents 27% of the City's population as compared to the statewide average of 8%. The City's Asian community has more than doubled from 1990 when it represented less than 4% of the total population. Although the rate of growth is expected to slow, in 2014 the Asian population is projected to account for approximately 9% of the City's population. Cambodians comprise the City's largest Asian ethnic group and represent the third largest Cambodian community in the U.S. Thirty-one percent of Lynn's population is comprised of individuals who were born in a foreign country, which compares to a statewide estimate of 14% and 28% in Boston. 57% of the foreign-born population in Lynn is from Latin America and an estimated 23% of the Lynn population speaks Spanish. Forecasts indicate continued growth in racial diversity; the City's minority population is projected to account for 48% of Lynn's total population in 2014.
- *Lynn's elderly population has declined.* Although Lynn experienced population growth of 10% during the 1990s the number of seniors declined by approximately 7% from 1990 to 2000. From 2000 to 2009 the City's elderly population further declined by 6% while the total population decreased by 3%. Lynn's elderly account for approximately 12% of the total population, and 18% of all households in the City are headed by persons 65 years or older. In 2007, 40% of all elderly households faced housing problems.
- *There is a substantial population of persons with disabilities in Lynn.* According to the 2008 ACS, over 11,000 persons aged 16 and over were disabled. This represented about 17% of persons in this age group. Of this number approximately 3,800 or 37% of the City's elderly population were disabled. In 2007, 58% of all disabled households faced housing problems.

- *The number of households in Lynn living below the poverty level has increased.* Between 2000 and 2006-2008 the number of persons in Lynn living below the poverty level increased by 13%. In 2000 there were 14,525 individuals living below the poverty level, reflecting a poverty rate of 16.6%. It is estimated that currently, 16,469 people or 19% of individuals in the City live in poverty. This is an increase of nearly 2,000 people since 2000, even though the population declined during the period.
- *Lynn continues to see a decrease in employment.* While the City has gained jobs in financial services and professional services, it has lost jobs in every other sector at a significantly higher rate than the North Shore region. The sectors with the greatest loss in the number of jobs between 2001 and 2008 are manufacturing, education and health and construction. However, Lynn's average wage has continued to increase and is above the average wage for the North Shore region.
- *Lynn has an aging housing stock, with little new construction occurring.* Nearly 50% of Lynn's housing stock is more than 70 years old. Property values have dropped significantly over the past five years and, although rents are still lower than rents throughout the region, 44% of households struggle to afford their housing. The supply of subsidized housing in the City is higher than surrounding towns, yet much of that stock is at-risk due to expiring use. In 2007 an estimated 55% of Lynn's housing units had one or more housing problems (substandard, overcrowding, no income or rent or cost burdens). The majority of problems are found in rental housing and the majority of problems (44%) have to do with affordability.
- *Housing vacancy has nearly doubled since 2000.* Lynn had an estimated housing supply of about 36,000 units in 2008. This represents a nearly 4% increase in housing units from 2000. However, the vacancy rate has nearly doubled since 2000. In 2000, there was a 3.25% vacancy rate, while the 2006-2008 estimate was 9.14%. This number is still lower, however, than the statewide vacancy rate of 9.71% during the same time. Residential sales in Lynn have suffered significantly in the past 2 years and Lynn has been especially affected by the current foreclosure crisis. Lynn has the third highest rate of distressed units per 1,000 housing units in the state at 39.5 compared to the statewide average of 15.73. In addition, 66% of homes purchased between 2004 and 2008 in the Lynn zip code of 01901 have negative equity. This is the highest rate in the state.
- *Lynn exceeds the 10% state goal for Chapter 40B subsidized units.* Approximately 12.9% (4,423) of the City's housing units are classified as affordable for income eligible households or Chapter 40B housing.
- *A substantial number of Lynn residents incur housing costs equal to 30% or more of their income.* Overall, in 2007, 42% of owner households and 46% of renter households incurred housing costs of 30% or more of income. In total, there are more (7,200 or 22%) households that are severely cost-burdened (paying more than 50% of their income on housing) in Lynn than there are households that are moderately cost-burdened (paying 30-49% of income on housing).

- *Overall median income has increased; however, household incomes have not kept pace with inflation.* The 2009 estimated median household income in Lynn is \$43,941, up 18% from 2000. The increase; however, has not kept pace with the Consumer Price Index for the Boston area, which increased 27% during the same period. Minorities tend to experience poverty at higher rates than whites; more than 20% of the City's African American, Asian and Hispanic/Latino populations live below the poverty level. In 2009, it was estimated that 40% of female households with children in Lynn lived in poverty.
- *Minority homeownership has increased.* The percentage of minority households that are homeowners has increased slightly (2.3%) since 2000, but at 24.9% still represents about only half of the city-wide rate and is below the national standard (50%) and the Commonwealth's benchmark (37%). According to data released by the Census Bureau for the first quarter of 2010, minority homeownership nationally has been falling: homeownership among African-American households is 45.6% and homeownership among Hispanics is 48.5%. Since 2000 the number of minority, owner-occupied households in Lynn increased 7.3%, while the total number of owner-occupied households increased 2.1%.

Public and Subsidized Housing

In addition to assessing citywide housing market and demographic information, LHAND reviewed statistical information regarding its resident population and waiting list. Relevant information includes the following:

- *LHAND is the largest single provider of affordable housing in Lynn, serving a mix of families, seniors and people with disabilities.* In total, LHAND serves over 4,000 households through its various Public Housing, Section 8 Certificate, Rental Voucher, Shelter Plus, and related programs. System-wide, approximately 15% of LHAND households are elderly and 20% are disabled.
- *LHAND serves a primarily "very low income" population.* Approximately 90% of all LHAND households have incomes less than \$20,000 per year and approximately 68% of the households have incomes less than \$15,000 per year.
- *LHAND clients continue to serve a racially and ethnically diverse group of clients.* The racial and ethnic composition of current LHAND-served households system-wide is: 69% White, 25% Black, 4% Asian, < .5% American Indian/Alaskan Native and 36% Hispanic.
- *LHAND's waiting list reflects continued high demand for affordable housing among low-income households.* LHAND generally operates with a 1-2% vacancy rate that reflects normal turnover operations. The Waiting List is currently comprised of 2,728 applicants; 1,550 for Federal Public Housing, 229 for State Elderly/Disabled Public Housing, 836 for State Family Housing, and 113 for the Housing Choice Voucher (HCV) Program. The

HCV waiting list was recently opened and approximately 5,000 applications were received, of which 1,000 will be selected by lottery for placement on the waiting list.

HOME & CDBG Housing Related Programs

LHAND also reviewed statistics on HOME and CDBG housing program participation. The participation rates by race and ethnicity for CDBG and HOME housing related programs for the period 7/1/07 to 6/30/09 are shown on the following table:

HOME & CDBG Program Utilization: 7/1/07-6/30/09
City of Lynn

Program	Total Clients	White	Black	Hispanic	Asian	Native American
Development Area Grant	59	41	10	8	0	0
Housing Preservation Gant	18	14	2	1	1	
Rehab Loan Program	21	16	3	1	1	0
Homeowners Energy Efficiency Program	4	4	0	0	0	0
Soft Second Homeownership Program	26	8	5	8	5	0
Realizing the Dream of Homeownership	19	10	6	3	0	0
Get the Lead Out	10	1	4	5	0	0
Single-Family Homebuyer	9	3	2	2	2	0
Multi-Family Homebuyer	8	3	3	2	0	0
FSS Match Single Family	4	0	1	1	2	0
TBRA	32	12	2	18	0	0
TOTAL	210	112 (53.5%)	38 (18%)	49 (23.5%)	11 (5%)	0 (0%)

- *The City's HOME and CDBG programs serve an increasingly diverse clientele in terms of race and ethnicity.* The statistics indicate that HOME and CDBG program participation rates reflect racial and ethnic diversity. Further, minority participation in these programs has increased substantially since the late 1990s. For example, the data indicated no program participation by Asian-Americans for the period 1997-1999, while the recent data shows participation of 5% of the total. In addition, Hispanic participation increased from 7.5% of the total to 23.5%.
- *The City's homeownership programs serve a racially and ethnically diverse clientele.* Data from the Infill Housing program in the table below shows significant participation by the minority population over the past few years. It should be noted that the Infill units are located largely in the Downtown Urban Core sub-markets of the City.

**Infill Housing Program: 7/1/07-6/30/09
City of Lynn**

Race/Ethnicity	Number of Homes Sold	% Of Homes
White	3	25%
Black	2	16.7%
Hispanic	2	16.7%
Asian	3	25%
Other	2	16.7%
TOTAL	12	

Discrimination Complaints

A measure of the impediments to fair housing choice is the number of formal discrimination complaints against public or private housing providers in the City. As part of the AI preparation process, the United States Department of Housing and Urban Development Office of Fair Housing (HUD), the Massachusetts Commission Against Discrimination, the Massachusetts Office on Disability, the Fair Housing Center of Greater Boston, and other agencies were contacted to provide information from 1/1/07 to the present on housing discrimination complaints and other data pertinent to fair housing choice. The following is a summary of information received to date:

- HUD provided a report on Fair Housing Complaints filed in the past 2+ years involving housing located in the City of Lynn. Currently there are no open housing discrimination cases in the City. Nineteen cases were reported by HUD: eight on the basis of disability; seven on the basis of national origin; two on the basis of race, national origin, and disability; one on the basis of race; and one on the basis of race and sex. Ten of the cases were closed as a result of a no cause determination; in eight of the cases the complaint was withdrawn after resolution; and one case was closed because the complainant failed to cooperate.
- The Massachusetts Commission Against Discrimination (MCAD) provided a report that listed the complaints filed during the past 2+ years related to housing discrimination in the City of Lynn. Seventeen complaints were received by MCAD for sites in Lynn, three of which were related to LHAND. Of these three cases, two were for disability and one was for disability and national origin. The two disability-related cases were closed for lack of probable cause and the case for disability and national origin, which was filed on 4/12/10, is active. Of the other complaints received by MCAD: six were for race/color; five were for disability; one was for national origin; one was for national origin, race/color and sexual orientation; and one was form disability/national origin. All of these cases have been closed: six were closed for lack of probable cause; six were withdrawn with settlement; one was closed for failure to cooperate; and one was conciliated.
- The Massachusetts Office on Disability provided a report that listed the complaints filed during the past 2+ years related to housing discrimination in the City of Lynn. Two

complaints were received by the Massachusetts Office on Disability for sites in Lynn, one of which was related to LHAND. The complainants were provided handicapped parking, as they had requested, and the cases were closed.

- The Independent Living Center of the North Shore and Cape Ann, Inc. reported that they did not receive any requests for advocacy assistance on housing discrimination issues in the City of Lynn.
- The Fair Housing Center of Greater Boston (FHCGB) reported four housing discrimination cases. LHAND was not involved in any of these cases and all of the cases are closed. One of the cases was on the basis of race (FHCGB declined representation); one was on the basis of sexual orientation (case was resolved without FHCGB intervention); one was on the basis of race, national origin, and sexual orientation (FHCGB settled the case prior to the investigative disposition, settlement included monetary damages and relocation to a new apartment); and one was on the basis of familial status and violation of lead laws (FHCGB resolved the case and the unit was de-leaded).
- The Disability Law Center was unable to provide information regarding housing discrimination cases in the City; however, it was suggested that training on reasonable accommodation and fair housing would be beneficial to LHAND.
- The Northeast Area office of the Commonwealth of Massachusetts Department of Mental Health is in the process of gathering the requested information. *This information will be revised pending receipt of data.*
- Neighborhood Legal Services is in the process of gathering the requested information. *This information will be revised pending receipt of additional data.*

While LHAND believes that the number of reported complaints and incidents discussed above is relatively low, it is critical that housing discrimination complaints be thoroughly investigated and addressed. Clearly, housing discrimination remains a national and regional problem. A study completed by the National Fair Housing Alliance (NFHA) in May 2010 reported that in 2009 there were more than 30,000 complaints of housing discrimination filed nationwide. Statistics for private fair housing groups, which processed the highest number of complaints, indicate that approximately 19% of the complaints were based on race, 37% based on disability, 15% based on a person's family status, and 10% based on nationality, 5% based on sex, and 14% based on religion, source of income, medical condition, age, and other factors..

Studies conducted by the Fair Housing Center of Greater Boston during the past decade documented evidence of housing discrimination in the Boston area in both the rental and homebuyer markets:

- The Center's 2006 report "*The Gap Persists A Report on Racial and Ethnic Discrimination in the Greater Boston Home Mortgage Lending Market*" cited differences in the treatment of and services provided to loan seekers of color when compared directly

to white loan seekers. These differences involved discouraging statements, higher quotes, or worse treatment of the person of color, which disadvantaged him/her. The investigation found that discriminatory behavior takes place from the very beginning of the lending process and can continue at many points throughout the process.

- In the study conducted from January 2004 to May 2005, *“You Don’t Know What You’re Missing: Realtors Disadvantage African American, Latino Homebuyers”*, the Center found that African American and Latino homebuyers experience disadvantageous treatment in just under half of their attempts to purchase homes in Greater Boston’s suburbs. The patterns of differences included access to agents, access to properties and listings, mortgage requirements, and encouragement versus screening.
- A 2004 study of housing discrimination in the Lowell and Merrimack Valley rental markets, *“Discrimination in the Lowell and Merrimack Valley Rental Markets”*, showed evidence of discrimination against Latinos at 67%, African Americans at 52%, Asian Americans at 38%, and families with children at 33%.
- *“Acceso negado/Access denied”*, a study completed by the Fair Housing Center in April 2002 documented discrimination against Latinos in 52% of their attempts to rent housing in greater Boston.
- In 2001 the Center tested for discrimination based on race, familial status and source of income. Statistics in the report *“We don’t want your kind living here”* included: 55% of the race tests showed evidence of discrimination against African Americans, 60% of testers with rental subsidies experienced discrimination, and 67% of testers with children experienced discrimination.

These studies reveal that although a potential renter or home buyer is not told outright that he or she is being turned away because of their race, subtle forms of discrimination are commonly used in the Greater Boston real estate market. These include failure of agents to return calls to people of color, failure of housing providers to supply information about available apartments to people of color, agents steering renters to apartments in neighborhoods predominantly populated by people of their own race or national origin, failure of housing providers to provide information on rents and rent specials to people of color and families with children, the imposition of a more strenuous application process and different terms and conditions for people of color, and less follow-up contact to people of color and families with children.

Conclusions

Based on the information summarized above, LHAND has not identified any City law, regulation, administrative policy, procedure or practice that has created a significant demonstrated impediment or barrier to fair housing choice within the City of Lynn. Although there continues to be challenges the City and LHAND continue to make progress, striving to overcome housing discrimination through continuing efforts to reduce or eliminate impediments to fair housing within the City. These impediments/barriers and the actions to be undertaken by the City and/or LHAND to address them are summarized below:

- **Housing Discrimination** – The City and LHAND will continue to implement policies and procedures to respond quickly to fair housing related complaints. See enclosed notice of current Fair Housing Grievance Procedures. As part of its ongoing reporting, the City will provide a summary of complaints received and their resolution, as well as report on ongoing and new activities during the reporting period.
- **Disparate Homeownership Rates by Minorities** – The City and LHAND will continue to work to increase homeownership among low and moderate income households, especially minority households. As noted above, the rate of minority homeownership has been increasing in Lynn. As part of its ongoing reporting, the City will provide updated information on overall minority homeownership trends as well as minority composition of participants in City-sponsored homeownership programs. The City will also report on actions taken to address this impediment during the reporting period.
- **Disparate Levels of Participation in Housing Programs by Minority Groups** – The City and LHAND will continue to outreach to all minority groups, especially the Asian community, to ensure broad-based participation in City funded housing and related program. Ongoing reporting will identify the level of participation in City and LHAND funded housing programs by minority group category. The City will also report on actions taken to address this impediment during the reporting period.
- **Economic Inequality** – The City will continue to promote the economic empowerment of low and moderate income residents by bringing new jobs into the City and by supporting job readiness, job training and job placement efforts. Ongoing reporting will identify the income status of residents served by City funded program activities as well as report on actions taken to address this impediment during the reporting period.
- **Homelessness and Special Needs** – The City and LHAND will continue to support the McKinney/PACT collaborative and local community-based development organizations to promote a full range of housing options for special needs and homeless persons. Ongoing reporting will provide information on the persons served by category as well as persons provided with permanent and other housing types.

These efforts are vital to LHAND’s mission to eliminate housing discrimination, remove impediments to fair housing choice, and respond to discrimination complaints. In addition, LHAND intends to review this report and all relevant documents with the public at large through the Consolidated Plan hearing and meeting process. Public input regarding policies and procedures designed to eliminate impediments and improve fair housing choice will continue to be solicited and considered.

Supporting Information

In the interests of presenting a concise and user-friendly report, LHAND has not included all of the tables and reports referenced in this document. However, all of the source documents are

available for public inspection at LHAND by contacting the Executive Director's Office, Lynn Housing Authority & Neighborhood Development, 10 Church Street, Lynn, MA.

FAIR HOUSING GRIEVANCE PROCEDURE

This notice is to be posted and prominently displayed at the Lynn Housing Authority & Neighborhood Development and in Lynn City Hall in the City Clerk's office in English, Khmer and Spanish.

Housing Discrimination Is Illegal.

The City of Lynn, Massachusetts is committed to the goal of eliminating discrimination in housing and affirmatively promoting fair housing choice for all citizens regardless of race, color, religion, sex, disability, familial status or national origin. All housing and community development programs administered by the City and its administering agency, the Lynn Housing Authority & Neighborhood Development, are open to all residents of the City of Lynn regardless of race, color, religion, sex disability, familial status or national origin.

How to File a Fair Housing Complaint in the City of Lynn:

If you believe that you have been discriminated against by the City of Lynn, the Lynn Housing Authority & Neighborhood Development or its sub-grantees with respect to the City's federal, state or locally funded housing and community development programs, you may file a complaint and request an informal hearing proceeding.

To file a complaint and request an informal hearing, you must do the following:

1. Document your complaint in writing. Provide a detailed explanation of the alleged discrimination with dates, contact names and other relevant information. If you have questions about what information should be documented, you may contact the Fair Housing Office of the Lynn Housing Authority & Neighborhood Development at the address and phone number listed below.
2. Submit the above documentation within 60 days of the date of the alleged discrimination incident to:

Lynn Housing Authority & Neighborhood Development
Attention: Fair Housing
10 Church Street
Lynn, MA 01902
Telephone: 781-477-2830

3. LHAND will record all complaints received in a log book.
4. Within thirty (30) days of receipt, a member of the LHAND Fair Housing Committee shall review the complaint and will contact the principal parties involved.

5. Upon request by either party, an informal hearing between the principal parties of the dispute may be arranged within thirty (30) days of the request. The primary purpose of the hearing will be to gather all pertinent information while educating complainant and respondent on Fair Housing Laws. The session shall generally be limited to one hour, during which you may present oral and/or written information relevant to the alleged discrimination complaint. The Fair Housing Committee may also request that other principal parties to the complaint be present at the informal hearing. The Fair Housing Committee shall review and consider the information presented in light of LHAND policies and procedures and fair housing laws. Within ten (10) days following the informal hearing, the LHAND Fair Housing Committee shall review and provide a final written response indicating LHAND's findings and proposed course of action with respect to the complaint.
6. The Fair Housing Committee shall consist of a Fair Housing Officer, two Committee members and one alternate appointed by the LHAND Executive Director. In the event that a member of the Fair Housing Committee must recuse him/herself, the alternate shall serve on the Committee.
7. If, after the informal hearing, the complainant wishes to file a complaint with a Fair Housing Agency, it is the duty of the Fair Housing Officer to provide the complainant with the necessary referral information.

Other Fair Housing Resources

There are other resources available to you for resolving fair housing related complaints. The following agencies may be able to provide information, referrals and/or investigative assistance related to fair housing discrimination:

Massachusetts Commission Against Discrimination
One Ashburton Place
Room 601
Boston, MA 02108
Telephone: 617/727-3990

Massachusetts Housing Finance Agency
One Beacon Street
Boston, MA 02108
Telephone: 617/854-1000

US Department of Housing and Urban Development
Office of Fair Housing
10 Causeway Street
Boston, MA 02222
Telephone: 617/565-5309
Toll Free: 1/800-669-9777

Neighborhood Legal Services
37 Friend Street
Lynn, MA 01902
Telephone: 781/599-7730

Disability Law Center
One Beacon Street
Boston, MA 02108
Telephone: 1-800-872-9992

Lawyers Committee for Civil Rights
294 Washington Street
Boston, MA 02108
Telephone: 617/482-1145

12. CITIZEN PARTICIPATION PLAN

A. Preface

The US Department of Housing and Urban Development issued a Final Rule effective February 6, 1995 which provides guidelines for the preparation of local Consolidated Planning submissions. Under this Final Rule, the City of Lynn is required to amend its existing Citizen Participation Plan to comply with the requirements of the new HUD regulations. Accordingly, the City of Lynn hereby adopts this amended Citizen Participation Plan.

B. Introduction

The purpose of this Citizen Participation Plan is to establish the guidelines and process to be utilized by the City of Lynn – acting through the Lynn Housing Authority and Neighborhood Development (LHAND) and the Lynn Office of Economic and Community Development (LOECD) - to ensure broad-based consultation and input in the development of the City's housing and community development policies. The Citizen Participation Plan detailed herein describes a framework for consultation with Lynn residents; public and private agencies, groups and businesses that provide assisted housing, health services, social services, economic development, infrastructure improvements, etc.; State and local health and child welfare agencies; and, to the extent necessary and practicable, other adjacent units of local government.

While the Citizen Participation Plan establishes a framework for involving citizens and the other parties noted above, it is not intended to limit the extent of citizen participation in the development of the City's housing and community development policies and programs. The City is committed to continue working with citizens and agencies from throughout the community in numerous formal and informal ways including a commitment to consultation, which extends beyond the formal requirements of this Plan. The City of Lynn is, therefore, committed to meeting and, to the extent practicable, exceeding the minimum formal requirements detailed herein.

C. Encouragement of Citizen Participation

The City of Lynn is firmly committed to a participatory, community-based system of government - one which provides extensive opportunities for citizens, business owners, faith-based organizations, developers, service agency representatives and other community leaders to directly influence the shape and direction of municipal government policies and programs. One of the most important components of this citizen participation effort involves the development of housing and community development strategies through the Consolidated Planning process.

The City encourages all of its citizens to directly participate in the formation of local housing and community development policies, in the development of the overall Consolidated Plan/Action Plan document, and in the review of the City's performance in meeting the goals established in the Consolidated Plan/Action Plan. Further, the City strongly supports and encourages the

participation of low and moderate income residents, members of minority groups, persons with disabilities, non-English speaking residents, and residents of public and assisted housing.

Accordingly, the City's outreach and information efforts are designed and will be implemented to reach as many Lynn residents as possible. Public meetings and other informational efforts will be broadly advertised, accessible to persons with disabilities and, where deemed necessary and practicable, allow for bi-lingual translation. The City also encourages residents who have ideas and suggestions to improve accessibility and increase community participation to communicate these suggestions in writing to the Director of the Lynn Housing Authority and Neighborhood Development and/or the Director of the Lynn Office of Economic and Community Development.

D. Standards and Scope of Participation

The City of Lynn, through the Lynn Housing Authority and Neighborhood Development and the Lynn Office of Economic and Community Development, shall continue to provide a process of citizen participation at the community-wide level with regard to the overall Consolidated Plan/Action Plan application and program and shall also provide a process of citizen participation at the neighborhood levels in areas where a significant amount of activity is proposed or ongoing. All aspects of citizen participation shall be conducted in an open manner, with freedom of access for all interested persons.

Citizens' Advisory Board on Community Development

Through the adoption of a formal Citizen Participation Plan on December 11, 1974, by the Mayor and City Council, a general community-wide Advisory Board on Community Development was established that facilitates active participation by citizens. The Board advises the Mayor, through LHAND and LOECD staff, in implementing the Citizen Participation Plan, and makes every effort to encourage citizen participation in the Community Development process. The Board disseminates information and holds public meetings and hearings about the Community Development Block Grant Program, community needs, and proposals to meet those needs. The Board facilitates communication between the public and professional staff, and advises the Mayor, through LHAND and LOECD staff, regarding Community Development needs and program proposals. Board members also provide ongoing communication with their respective City Councilors concerning housing and community development issues. Finally, the Board strives to increase the quality of citizen participation in the Consolidated Planning process.

The Advisory Board on Community Development is formed and serves in the following manner:

- The Mayor appoints seven members to the Board.
- An additional eleven members are appointed, one by each member of the City Council. The term of service of each Board Member is the same as that of the appointing party. In the event of a vacancy on the Board, replacements on the Board are made in the manner prescribed above.

- All members of the Advisory Board on Community Development appointed by the Mayor serve at his/her pleasure. If a member of the City Council wishes to have his/her appointee removed from the Board, the matter comes before the full City Council for a decision.
- The Board elects a Chairperson and Vice Chairperson from among its members to serve a two-year term. Elected Officers may be reelected to serve additional terms if so elected by the Board.
- The Board meets at the call of the Mayor or the Chairperson.

Any member of the Board who misses three (3) consecutive meetings without good cause is automatically removed from the Board.

Responsibilities of the Advisory Board on Community Development include the following:

- To advise the Mayor concerning Community Development and Housing needs in Lynn, and proposed programs to meet those needs including reviewing and providing consultation on the City's Consolidated Plan/Action Plan submission.
- To provide City residents with information concerning Community Development Block Grants, needs, and program proposals including conducting public hearings.
- To conduct two formal public hearings per year as detailed below for the purpose of soliciting citizen input to the Consolidated Plan/Action Plan and reviewing program performance. In addition, the Board shall conduct an additional public hearing to solicit citizen comment in the event that the City proposes to submit a substantial amendment to the Consolidated Plan/Action Plan as defined below.
- To meet in sub-committees as necessary to increase its understanding of Consolidated Plan needs and programs, to prepare materials for distribution to other citizens, to plan for public meetings, and to prepare reports to the Mayor.
- To advise the Mayor as required concerning Consolidated Plan/Action Plan program applications, substantial amendments, revisions, reallocations of funds and designation of new activities or locations.
- To otherwise facilitate involvement and participation of the citizens of Lynn.

The Advisory Board meets to discuss current issues concerning Community Development and Housing, including the Consolidated Plan/Action Plan. These meetings provide the opportunity for the Board to offer their opinions and advice concerning Community Development and Housing activities and the form and content of the Consolidated Plan/Action Plan. During these meetings, the Board is informed of upcoming matters of importance. At various times, sub-committees are formed and meetings are held in order to address issues that require special attention.

Information on technical program requirements shall be provided to the Citizens' Advisory Board, groups of low and moderate income persons, and residents in blighted neighborhoods by LOECD and LHAND staff throughout the year at such times when needed or requested. The level and type of technical assistance shall be determined by the LOECD and LHAND on an individual basis upon consideration of varying needs and requests.

Neighborhood Level Citizen Participation

The City of Lynn, through the Lynn Housing Authority and Neighborhood Development and the Lynn Office of Economic and Community Development shall provide for and encourage citizen participation, with particular emphasis on participation by persons of low and moderate income who are residents of slum and blighted areas and of areas in which funds are proposed to be used, persons with disabilities, residents of public and assisted housing and minority citizens. As previously noted, the City intends to maximize the opportunity for citizens to become involved in shaping housing and community development policies, in developing the Consolidated Plan/Action Plan, and in monitoring program performance. Specific opportunities for citizen participation at the neighborhood level will include:

- Individuals can register for housing programs at LHAND's administrative offices, which are located at 10 Church Street and are handicapped accessible. Periodic speaking engagements are scheduled by LHAND and LOECD staff to inform and receive comments from neighborhood residents.
- As needed and/or requested, meetings will be held with various neighborhood groups including social service agencies, business and civic organizations, minority groups, low and moderate income residents, residents of public and assisted housing, and persons with disabilities. Public meetings shall be conducted in settings consistent with the requirements of Section 504. Where necessary and practicable, the City shall endeavor to provide or facilitate the provision of translation services.

In implementing these processes of citizen participation, the City shall make reasonable efforts to ensure access to citizens or citizen organizations throughout all stages of the program. Citizens shall be provided with reasonable and timely access to local meetings, information, and records relating to the grantee's proposed use of funds, as required by the regulations of the secretary, and to the actual use of funds. LHAND and LOECD staff shall provide reasonable levels of technical assistance to those eligible groups who request assistance in developing program proposals for consideration as part of the annual Consolidated Plan process.

LHAND and LOECD staff shall consult as needed with the State and local Departments of Public Health and with local child welfare agencies in the development of lead based paint policies.

LHAND and LOECD staff shall consult with the Metropolitan Area Planning Council and other local governments to the extent practicable and necessary to develop coordinated housing and community development policies and programs.

E. Complaints

Citizens, particularly low and moderate income persons and residents of blighted neighborhoods, are encouraged to submit their views and proposals regarding the Community Development Program in Lynn.

LHAND or LOECD staff shall respond to all written comments, complaints, and grievances as needed, in a timely and responsive manner. Staff will make every reasonable effort to provide responses, in writing, within fifteen (15) working days from the receipt of said written inquiring or complaint.

F. Public Hearings

The City of Lynn shall provide for two formal public hearings to obtain citizen views and to respond to proposals and questions at different stages of the Consolidated Plan process, including at least the development of needs, the review of proposed activities, and review of program performance, which hearings shall be held after adequate notice, at times and locations convenient to potential or actual beneficiaries, and with accommodation for persons with disabilities and, as necessary and practicable, non-English speaking residents. Said hearing shall be conducted by the City's Citizen Advisory Board.

Bilingual Assistance

Wherever a significant number of low and moderate income persons and residents of blighted neighborhoods speak and read a primary language other than English, where practicable and necessary, bilingual assistance shall be offered at required public hearings. Spanish and Khmer are the most common minority languages in Lynn.

Pre-Submission and Performance Review Hearings

LHAND and LOECD shall coordinate formal pre-submission hearings: 1) to obtain views and proposals of citizens at the initial stage of application development and to review and report on past program performance, and 2) to obtain views of citizens on the proposed application before its submission to HUD for funding. Through these hearings, citizens will be provided an opportunity to assess and submit comments on the proposed Consolidated Plan Program.

1. Pre-submission Hearing/Application Development and Performance Review

At the time of the initial planning stages for the City's Consolidated Plan/Action Plan application development, a public hearing shall be coordinated by the Citizens Advisory Board at a central location, accessible to people with disabilities, to hear proposals on community development and housing needs and priorities, and to report on past performance. "A Notice of Submission of the Grantee Performance Report to all Interested Agencies, Groups and Persons" is published in newspapers of local circulation at the end of the fiscal year and a copy of the relevant

performance reports are kept on file in the Office of Economic and Community Development for inspection by the public.

LHAND and LOECD will ensure that the following information be made available to citizens:

- The total amount of Community Development Block Grant funds available to the applicant for community development and housing activities, including planning and administrative activities;
- The range of activities that may be undertaken with these funds and the kind of activities previously funded in the community;
- The estimated amount of those funds proposed to be used for activities which will benefit low and moderate income persons;
- Proposed activities likely to result in displacement and the City's plans to minimize displacement of persons as a result of the proposed activities;
- The types and levels of assistance the City will make available to persons displaced by funded activities, even if no such displacement is expected to occur;
- The processes to be followed in drawing up and approving the local application and the schedule of meetings and hearings;
- The role of citizens in the program as provided under this section; and
- A summary of other important program requirements.

LHAND and LOECD staff shall provide technical assistance to groups, representative of persons of low and moderate income, that request such assistance in developing proposals, with the level and type of assistance to be determined by the grantee.

A Notice of Public Hearing for purposes of reporting on past performance and soliciting citizen input at the application development stage shall be published in newspapers of local circulation at least ten days prior to the date of the hearing. Citizens shall be afforded a fifteen (15) day period to comment on the City's proposed performance report. The City shall consider all citizen comments and shall attach a summary of said comments to the performance report submitted to HUD.

2. Pre-submission Hearing - Proposed Application

Prior to submission of the Consolidated Plan/Action Plan to HUD, the City shall prepare and publish a proposed plan for citizen review and comment. Upon publication of the proposed plan, the Citizen Advisory Board shall coordinate a second formal public hearing for the purpose of soliciting citizen comments on the City's proposed Consolidated Plan/Action Plan. The Public Hearing shall be scheduled and coordinated by the Citizen Advisory Board to allow the

public to review the content of the City's proposed plan and to submit comments regarding the proposed plan.

The Notice of Public Hearing shall be published in newspapers of local circulation approximately ten days prior to date of the public hearing. As part of this Notice, the City shall publish a summary of the proposed annual plan in at least one newspaper of local general circulation which identifies the total proposed amount of funding in each of the major program categories (CDBG, HOME, ESG, and HOPWA). The Notice shall also indicate the location(s) where citizens may examine a copy of the entire proposed plan. In addition, the City shall provide a reasonable number of free copies of the proposed plan to citizens and groups that request it.

Citizens shall be afforded a thirty (30) day period to review and comment on the proposed plan which shall commence upon publication of the Notice of Public Hearing. Upon completion of the thirty day public review period, final recommendations shall be submitted to the Mayor by LHAND and LOECD for approval. Upon the Mayor's approval, the final plan shall be submitted to the US Department of Housing and Urban Development for approval. Copies of the final approved plan shall be made available to the public for examination upon request.

3. Additional Hearings - Substantial Amendment

The City anticipates that, in certain circumstances, the Action Plan may require amendments to meet the City's housing and community development needs. In those instances where a substantial amendment is proposed by the City, the Citizen Advisory Board shall coordinate a public hearing to allow for public review and comment on the proposed substantial amendment. A substantial amendment shall be defined as a proposed change to the Action Plan which represents five percent (5%) or greater of the total annual plan budget. The Citizen Advisory Board shall publish a Notice of Public Hearing to review the proposed substantial amendment at least ten days prior to the date of the hearing. Said Notice shall be published in at least one newspaper of local general circulation. Said Notice shall specify the nature of the proposed substantial amendment and shall indicate the locations where citizens may examine a complete copy of the proposed substantial amendment. The public shall be afforded a thirty (30) day period to review and comment on the proposed substantial amendment which shall commence upon publication of the Notice. Upon completion of the thirty (30) day public comment period, the Citizens Advisory Board shall submit its recommendation to the Mayor through LHAND and LOECD.

