CITY OF DOVER, NEW HAMPSHIRE
Community Development Block Grant Program

CAPER FFY2014
Consolidated Annual Performance and Evaluation Report FFY2014
July 1, 2014 – June 30, 2015
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Introduction

The City of Dover Office of Planning and Community Development is pleased to present the comprehensive Consolidated Annual Performance Evaluation Report (CAPER) for the period July 1, 2014 through June 30, 2015.

The CAPER is a summary report that the Community Development Division submits to the U.S. Department of Housing and Urban Development (HUD) describing the activities of the City’s housing and community development programs for fiscal year 2014-2015. The primary purpose of the report is to provide citizens and HUD with information on how the City used its Community Development Block Grant (CDBG) funds and the clients that were served by the use of those funds.

Funding comes to the City’s Community Development Division in the form of an annual block grant from HUD. CDBG funds can be used for a variety of activities to provide decent housing and a suitable living environment and to expand economic opportunities. Persons benefitting from these funds must be low and moderate income.

In FY 2014-2015 the City received $280,168 in CDBG funds and $280,330 in Program Income for a total of $560,498. The City expended $560,498 during this fiscal year.

The CAPER highlights priority needs, specific objectives, strategies, and accomplishments. Each priority need is addressed with detail activities such as: Clearance and Demolition, Commercial Rehabilitation, Economic Development, Acquisition, Non-Profit Funding, Neighborhood Facilities, and Infrastructure. Homebuyer Opportunities and Fair Housing activities are also discussed.
Assessment of Progress Toward Five (5) year Goals FY10-FY14 and Assessment of Progress toward Annual Goals FY14

In the 2014-2015 Annual Action Plan, the Community Development Division identified specific areas of concern as identified through public hearings and Continuum of Care meetings. Based on this input the City has continued to support public service agencies to the maximum extent possible, continued public facility improvements and fostered economic development and job creation in the City.

The City of Dover continues to make progress towards the goals established during the 2014-2015 Annual Action Plan planning process. Through the partnerships formed both, internally and externally; the Community Development Division has been able to provide support for the homeless and persons living with AIDS as well as provide support for families in transition from homeless to permanent housing. Through the use of CDBG funds we have continued to ensure that owners-occupants have decent and safe housing through our Housing Rehabilitation Program.

The activities and actions taken by the City during this reporting period helped to accomplish the promotion of several areas of concern. Even though the Community Development Office did not expend CDBG funds for all of these activities this year, staff going forward staff will continue to identify and pursue feasible activities that align with the strategies identified in the new Five Year Consolidated Plan.

Specifically, the following performance measures and the related accomplishments were achieved this year:

Strategic Plan Objectives from City of Dover Consolidated Plan (FFY2010 through 2014)

HOUSING NEEDS
High Priority: Very low to Moderate Income (0 to 30% and 80% MFI) renters, Elderly, small and large households paying >30 and >50% of their income for rent, and those in substandard housing.

Investment Plan
Analysis of the housing problems experienced by very low-income households against the availability and condition of affordable units identifies rental assistance and moderate rehabilitation through other partners. The primary activities to be pursued and used over the next five years. Secondary activities include support services associated with assisting households with everyday expenses.
Progress

Rental Assistance
Within the reporting period, the number of project-based subsidized units is anticipated to not increase (through construction and occupancy phase).

City Welfare funds for emergency rental assistance provided funding for 66 Dover residents.

Rehabilitation and Acquisition
The Housing Partnership successfully purchased and rehabilitated, with Low income housing tax credits, a vacant warehouse to create additional affordable housing in Dover. The project was completed during the last fiscal year and contains 42 units total with 9 one bedroom units, 4 three bedroom and 29 two bedroom units of permanent affordable housing. All units were occupied by the end of the fiscal year by low income residents.

In 2014, the Partnership was approved by the Planning Board for another 49 units on an adjacent parcel. In addition to the units, there will non-residential components to the property, which will provide resources and potentially jobs for residents of the building.

2. High Priority: Assistance to homeowners low-income (0 to 30% and 31 to 50% MFI) paying >30 and >50% of their income for housing.

Investment Plan
Federal financial resources to very-low and low-income homeowners in order to alleviate housing cost burdens do not exist. The New Hampshire Housing Finance Authority has a reverse equity mortgage program aimed at enhancing monthly incomes of elderly homeowners. Applicants to the program have to be at least 70 years old. To date, only one Dover resident has utilized this mortgage, but other residents of Strafford County have taken advantage of the program. The City can assist with rehabilitation needs through its CDBG Program and City Welfare expenditures will be used to help. By assisting the low-income homeowner with other needs such as fuel assistance or assistance with medical expenses, more of their available resources are available for housing costs.

Progress
The City completed work on addressing HUD finding issues during the year. No assistance was given to this group of homeowners, as the program was curtailed.

2a. High Priority: Assistance to homeowners very low-income (0 to 30% with Physical defects.

Investment Plan
The City funded Strafford CAP which can provided assistance to owners with physical defects and weatherization

**Progress**
Twelve Dover homes were assisted with heating work and weatherization over the last year.

2b. High Priority: Assistance to homeowners low and moderate income (31 to 50% and 51-80% MFI) with physical defects.

**Investment Plan**
The City funded Strafford CAP which can provided assistance to owners with physical defects and weatherization.

**Progress**
Twelve Dover homes were assisted with heating work and weatherization over the last year.

3. High Priority: Assistance to the homeless and populations at risk of becoming homeless.

**Investment Plan**
During the next five years it will be important to increase the number of available emergency shelter beds. Provide an increased number of supervised housing opportunities for people in transition and/or need of direct assistance. Continue funding and assist Dover households with the security deposit assistance program aimed at helping the homeless and people in transition obtain existing rental units. Continued support of My Friend’s Place transitional housing efforts and Strafford County Homeless Center. Continued support of improvements and repairs at My Friend’s Place.

**Progress**
The City funded the Welfare Security Deposit Assistance Program as well as My Friend’s Place for shelter operations and Transitional Housing operational funds. The City also supports the Strafford County Homeless Shelter, located in Rochester. Dover also supported My Friend’s Place homeless shelter and their transitional housing units. In FY10, the City provided funds to Cross Roads House to renovate their family housing building. The project was completed during the FY11 fiscal year and incorporates solar and other energy efficient measures during construction. The building houses 6 families at the shelter.

4. High Priority: Assistance to Populations with Special Needs

**Investment Plan**
During the next five years, continue support of Community Partner’s Security Deposit Assistance Program by providing 24 security deposits for their mentally ill clientele. Continued support of AIDS Response Seacoast for their client services coordinator. ARS provided assistance for 18 people with AIDS. Additional support housing for those with special needs will be addressed through Federal sources and State resources.

**Progress**
Community Partners was provided funding for their Security Deposit and Emergency Assistance Program. AIDS Response Seacoast was also funded for operational costs.

**ECONOMIC DEVELOPMENT NEEDS:**

**High Priority: Commercial Industrial Rehabilitation & Infrastructure & Other Improvements**

**Investment Plan**
During the next five years the City anticipates continued funding in the Dover Economic Loan Program (DELP), on an as-needed basis. The loan pool has been self-sustaining over the past years.

**High Priority: Other Businesses**

**Investment Plan**
During the next five years the City anticipates continued funding in the Dover Economic Loan Program (DELP) Loan payments are put back into the revolving loan account for additional lending. On an as needed basis, funds designated toward housing rehabilitation can replenish the economic loan fund.

**Progress**
Over the past year, one Economic loan was made for job retention. This loan assisted the continuation of a retail shop in downtown Dover that has existed for over 20 years. The retention of 4 positions was possible through the funding. Both full and part time positions were retained.

**OTHER COMMUNITY DEVELOPMENT NEEDS:**

**High Priority: Energy Efficiency Improvements**

**Investment Plan**
During the next five years the City will continue to offer weatherization through the Community Action Program as Dover no longer does their Housing Rehabilitation Program.

**Progress**
Community Action was funded with a $25,000 grant for weatherization and other repairs. A total of 12 Dover homes were weatherized and repaired under the Weatherization program with CDBG funding.

**ACCESSIBILITY NEEDS**

1. **Medium Priority: Accessibility Needs**

   Need level determined by Planning Department, other City Departments and Public Service Agencies

   **Investment Plan:**
   The City continues to work toward identifying needed accessibility projects in the public facilities and infrastructure in the downtown areas.

   **Progress**
   Funds were appropriated for door openers at the Senior Center located in the McConnell Center, a social and human service hub.

2. **Medium Priority: Public Facilities**

   **Investment Plan:**

   **Progress**
   Dover Children’s Center on Back River Road received energy efficient appliances to replace some that had broken down.

   The Dover Housing Authority requested funding for the completion of additional education and community space within an existing community center. This center is used for afterschool homework assistance and community building for children living in the Authorities family complex.

**Medium Priority: Lead Base Paint / Hazards**

**Investment Plan**
The City will continue to attempt to partner and offer letters of support with Community Action and the New Hampshire Housing Finance Authority for a set aside to do lead abatement in Dover homes containing lead and children under the age of six (6).

Based on the City’s small entitlement amount and limited staffing, Dover is looking to only partner with other agencies and offer support for LBP removal at this time.

Implementing The HUD’s lead base paint regulations may make this program undesirable to many homeowners or landlords that do not have children in their
home or unit and that do not want to deal with lead paint interim controls, which ultimately push up the price of the work they desire to be done on the home. The passage of the EPA’s RRP program has helped level the playing field with HUD’s rules however. It has also provided the City with many new potential contractors to select since they have been through the lead safe renovators course offered by the New Hampshire Housing Finance Authority and many local lumber yards for their contractors.

Progress
The City annually has supported a lead grant to NHHFA. The State has the Community Action Programs (CAP) administering the lead grant it received.

The City was not requested to provide any funding for lead abatement in the City during last fiscal year.

PLANNING:

1. High Priority: Planning

Investment Plan
During the next five years, the City will be working on transportation issues, creating Annual C. D. Plans, updating the Consolidated Plan, working on Capital Improvement Plans, develop codes, ordinances and regulations. Funding for planning in the community comes mainly from the City of Dover and is supplemented by the Community Development Block Grant Program.

Progress:
In addition to the zoning work already underway in 2014, the Planning Department utilized Block Grant funding to begin work on an update to the Transportation Master Plan. This portion of the plan will focus on access to mass transit by low and moderate income residents.
**Affirmatively Further Fair Housing**

**Description of Actions Taken to Effect an analysis of Impediments.**

The actions taken to effect the Analysis of Impediments included:

- A comprehensive review of the City's laws, regulations, administrative policies, procedures and practices with regard to fair housing in Dover;
- An assessment of how those laws, regulations, policies, and procedures effect the location, availability, and accessibility of housing; and
- An assessment of public and private sector conditions affecting fair housing choice.

The process of preparing the analysis has included drawing on the expertise of several agencies, boards, and organizations with years of experience dealing with impediments to fair housing. Participants included: local non-profit housing providers, New Hampshire Legal Assistance, the Dover Housing Authority, the NH Association for the Blind, and the Seacoast Board of Realtors. A brief questionnaire and an invitation to comment on any aspect of fair housing choice were sent to those organizations. A complete list of these organizations is as follows:

- Strafford & Rockingham Continuum of Care (social service agencies)
- City of Dover Department of Planning and Community Development.
- City of Dover Department of Public Welfare
- Dover Housing Authority
- NH Legal Assistance
- NH Commission on Human Rights
- NH Housing Finance Authority
- Catholic Charities
- COAST
- United Way – Community Impact

In preparing the Analysis, the Department, contacted a number of private and public agencies for their input on Fair Housing issues in Dover and the surrounding Strafford County, and possible impediments. The Department relied upon the following methods in developing this analysis.
Housing advocates and organizations representing minority and protected classes were solicited for their input using a brief questionnaire and an invitation to comment on any aspect of fair housing choice. To build on past efforts in Fair Housing planning, earlier studies were revisited and incorporated into the analysis. Housing and demographic data from the New Hampshire Housing Finance Authority (NHHFA), the U.S. Census, and Dover's Comprehensive Housing Affordability Strategy (CHAS), Consolidated Plan and Housing Section of the City’s Master Plan were used as a base of information. Additional comments were sought from the private sector, including housing providers, and affordable housing advocates. Public sector involvement included the Inspection Services Division of the Fire and Rescue Department, and the Dover Housing Authority, in addition to the Planning Department.

**Barriers to Affordable Housing:**

**INTRODUCTION:**

The following is an analysis of barriers to affordable housing using the regulations governing administration of the Community Development Program. The analysis will indicate what barriers to affordable housing, if any, exist within the City, and whether said barriers fall under the public sector or the private sector, or a combination of the two. The analysis will indicate whether a barrier has already been analyzed, or is in need of initial or further analysis. The analysis will prioritize any barriers based on their severity. Finally, what mitigating actions are planned to be taken, and what actions should be continued, strengthened or ended will be included in the analysis. Also included is how Community Development gathered its information for the analysis.

**COMMUNITY BACKGROUND:**

Based on the 2010 Decennial Census, Dover had a population of 29,987, which represents an increase of 3,103 (11.5%) since 2000. This is higher than the 7.3% growth rate that Dover experienced between 1990 and 2000. As a result, Dover became the State’s fifth most populated community, and the most populated in Strafford County. After the 2000 census, the New Hampshire Office of Energy and Planning projected that by 2010, Dover’s population would be 29,310. Dover exceeded that number and had population growth that exceeded all of the other communities in the top ten.

The City of Dover is a suburban, combination workplace-oriented, bedroom community of approximately 29,987 with a 8.4% minority population. The City is located in the geographic and transportation network center of an intricate regional economy. The City's role as an employment and housing center in the seacoast metropolitan region is expanding, due primarily to its central location and
its nexus on the region's roadway network and its availability of relatively lower-priced housing units as compared to Portsmouth (which is situated somewhat closer to a majority of the jobs in the region).

The City consists of 28.6 square miles of which 51% of the land area has been developed for residential use and 10% has been developed for non-residential uses. The remaining 39% are either vacant, in public, agricultural, or institutional use. Of the developed residential area, about 84% consist of single-family dwelling units. Most of the multi-family development is located in and around the urban core, with expanding suburban subdivision development.

The following chart indicates the percentage of land use in 2015:

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Acreage</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential</td>
<td>8,016</td>
<td>51.5%</td>
</tr>
<tr>
<td>Conservation</td>
<td>2,195</td>
<td>14.1%</td>
</tr>
<tr>
<td>Civic</td>
<td>1,860</td>
<td>12.0%</td>
</tr>
<tr>
<td>Vacant</td>
<td>1,726</td>
<td>11.1%</td>
</tr>
<tr>
<td>Commercial</td>
<td>717</td>
<td>4.7%</td>
</tr>
<tr>
<td>Industrial</td>
<td>688</td>
<td>4.4%</td>
</tr>
<tr>
<td>Non-Profit/Utility</td>
<td>355</td>
<td>2.3%</td>
</tr>
<tr>
<td>Total</td>
<td>15,557</td>
<td></td>
</tr>
</tbody>
</table>

Forty-seven percent of the year round housing stock is rental property, while fifty-three percent is intended for owner occupancy. In 2010 these values were the 49/51; this statistic reflects the trend towards more single-family housing starts. 12.7% of the rental housing stock and 1.2% of the owner housing stock is substandard as defined by overcrowding, a lack of adequate plumbing or kitchen facilities, or a cost burden of greater than 30% of total income. It is estimated that approximately 10% of the housing stock is in physical disrepair.

The City's population is 92.7% white, with the 7.3% minority and ethnic populations being divided between Black at 1.8%, Asian at 4.7%, and American Indian/Alaskan Native at 0.2%. The racial/ethnic minorities are not concentrated within any location in the jurisdiction; in fact, the 2010 Census Data indicates an
even distribution of minorities throughout the City. This is consistent with the results of the 2000 Census.

Similarly, low-income residents remain rather evenly distributed throughout the City. Slightly higher numbers of low-income residents are found in the urban core and Cochecho River areas, primarily due to the availability of multifamily rental units. The average household income for the jurisdiction is 113% of the national average. Despite this, 21% of all households are very low income, and 20% of all households are low income as defined by Department of Housing and Urban Development criteria. This compares favorably with regard to the entire region (Portsmouth-Dover-Rochester, NH-ME PMSA[now the Dover-Rochester MSA]), which tallies a 35.3% of all household being very low income.

**PUBLIC SECTOR:**

This section deals with analyzing building, zoning, health, community development, transportation, and community services policies, practices, procedures, and actions or omissions of actions to determine if they affect affordable housing choice.

Current Subdivision, Site Review, and Zoning ordinances were reviewed during the January through April 2012 timeframe, using Chapter 5 of the Fair Housing Planning Manual, December 5, 1995, as a guide for analysis.

Following are the City of Dover's 5 principal impediments to affordable housing choice in the public sector:

a. The Zoning Ordinance Allows Group Homes by Special Exception only, not by right, in two of the City’s zoning districts. The districts, RM-U, and O represent a small area of the City’s Zoning district area. The CBD district allows the use by right, as well as the use of a rooming house by right. A further barrier is that the RM-U does not offer either developable land or adequate in-fill opportunities for such a use to reasonably locate. The Special Exception criteria and requirement for a public hearing may subject the process to NIMBY reactions that may influence decisions made by the Zoning Board.

b. It has been estimated that approximately 40% of the rental housing stock in the jurisdiction have some amount of lead-based paint hazard on the premises. Low income and minority households tend to rent units which still have this hazard, simply because the rent amount is lower than other rental units. Because a unit’s age, condition, and location define the rents, these are units that can least afford to be made lead-based paint free for the foreseeable future. Fair housing choice between lead-based paint contaminated and lead-based paint free rental units should not just be
dependent on state laws prohibiting renting to families with children under the age of six, the ability of the units owner to pay for mitigation, or the ability of the household to pay more funds for the rent.

c. Large numbers of very-low and low-income homeowners are overpaying for their housing costs, and many are living in substandard housing. Sixty-nine percent of all very-low income homeowners in the City expend more than 30% of their gross income on housing costs and 45% of those expend more than 50% on housing costs. Most all of these dwellings have rehabilitation needs. These low-income homeowners are finding it difficult to refinance existing mortgages allowing reduced monthly debt service costs to draw on equity or to rehabilitate their homes. Low income and minority households also need assistance with down payment and closing costs to purchase a home.

d. A majority of the respondents to the Planning Department’s solicitation for comments on fair housing identified affordability of family-sized units as an impediment to fair housing. While the city has programs and policies, targeted to meeting local affordable housing needs for larger families, housing affordability continues to be a high local and regional issue. Dover is both a regional job center and a bedroom/student housing community within a relatively high-cost housing market area, given that Portsmouth and Durham housing is higher than Dover’s, yet Dover is higher than the rest of the County.

e. Public Transportation Availability was not identified in the previous AI as a barrier to housing choice, but should have been. That it is now is more a result of what has been accomplished to ameliorate the impediment over the past two years.

**PRIVATE SECTOR:**

The one private sector barrier that may have existed last year has become much less of a concern because of the economic downturn and paucity of available rental units relative to what had been a very low vacancy rate. The issue involved a previous trend in the City whereby private landlords appeared to be taking (possible fairly) advantage of the tight rental market in the MSA, and charging maximum rents for an increased profit. This issue has receded during the year.

Approximately 40% of all renters in the Portsmouth, Dover, and Rochester area are unable to afford fair market rent for a two-bedroom apartment, which is $1,064 per month (average). One-bedroom units go for $800 (average). Approximately 30% are unable to afford a one-bedroom apartment. Three-bedroom units average is $1458, however a poll taken during 2015 indicated that rents for such units ran from $1040 upwards to $1390 at that time. Two bedroom
units were running from $950 to $1200 according the Planning Department informal telephone poll taken by the Planning Office. This year’s information was taken from the National Low Income Housing Coalition for 2015 and represents the metropolitan statistical area:

**Portsmouth-Rochester HMFA Fair Market Rents**

In Portsmouth-Rochester HMFA, the Fair Market Rent (FMR) for a two-bedroom apartment is $1,064. In order to afford this level of rent and utilities, without paying more than 30% of income on housing, a household must earn NA monthly or $42,580 annually. Assuming a 40-hour work week, 52 weeks per year, this level of income translates into a Housing Wage of $20.46. New Hampshire as a whole ranks 43’rd highest in the country for the housing wage needed to afford a two bedroom unit.

In Portsmouth-Rochester HMFA, a minimum wage worker earns an hourly wage of $7.25. In order to afford the FMR for a two-bedroom apartment, a minimum wage earner must work 113 hours per week, 52 weeks per year. Or, a household must include 2.8 minimum wage earner(s) working 40 hours per week year-round in order to make the two bedroom FMR affordable.

In Portsmouth-Rochester HMFA, the estimated mean (average) wage for a renter is $13.14 an hour. In order to afford the FMR for a two-bedroom apartment at this wage, a renter must work 62 hours per week, 52 weeks per year. Or, working 40 hours per week year-round, a household must include 1.6 worker(s) earning the mean renter wage in order to make the two-bedroom FMR affordable.

Monthly Supplemental Security Income (SSI) payments for an individual are $710 in Portsmouth-Rochester HMFA. If SSI represents an individual's sole source of income, $213 in monthly rent is affordable, while the FMR for a one-bedroom is $852.

*A unit is considered affordable if it costs no more than 30% of the renter's income.*

<table>
<thead>
<tr>
<th>Location</th>
<th>Number of Households</th>
<th>Rent Households</th>
<th>Renter Households as Percent of Total Households</th>
</tr>
</thead>
<tbody>
<tr>
<td>New Hampshire</td>
<td>514,869</td>
<td>141,527</td>
<td>27%</td>
</tr>
<tr>
<td>Portsmouth-Rochester, NH-ME</td>
<td>88,174</td>
<td>27,203</td>
<td>31%</td>
</tr>
</tbody>
</table>

The obstacles to meeting the underserved needs are both the lack of affordable housing and the lack of resources to address the need. This creates a “landlords
“market” where many of the lowest income, those with special needs and households with children are considered a higher housing risk and subsequently are not competing well for the limited housing supply.

**STRATEGY TO REMOVE OR AMELIORATE NEGATIVE EFFECTS OF PUBLIC POLICIES THAT MAY SERVE AS BARRIERS TO AFFORDABLE HOUSING:**

In response to the identified barriers, the City will take the following actions over the next five years:

a. The Planning Department completed work on its Land Use Analysis Master Plan update in 2015. This chapter included a housing component. Part of this work included a study to ascertain which zoning districts would be appropriate to allow increased density. Furthermore, the chapter suggests that the City investigate new and innovate ways to incentivize smaller size units, which would increase the availability of affordable small units within the City.

b. The City continues to have a considerably higher number of public housing and government assisted rental units than all other communities in the MSA. The City is proactive in maintaining this high number of units through its public and governmental agencies. This is an on-going action.
This model could be updated annually using NHDP estimates of the current housing supply. The model also awards communities credits for multi-family construction that potentially serve rental needs.
EXAMPLE 2: DISTRIBUTION OF EXISTING AND PROJECTED AFFORDABLE RENTAL HOUSING NEED TO 2015

Need is defined by the estimated number of non-elderly renters who will have a high housing cost burden in 2015 if affordable rental housing is not available to reduce housing costs. The model includes recognition of the assisted rental housing units in general occupancy projects already located in the municipality.

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<tbody>
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<td>Factor Weighting Points</td>
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<td>4.3</td>
<td>2.6</td>
<td>2.6</td>
<td>1.6</td>
<td>1.4</td>
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<td>0.5</td>
<td>0.5</td>
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<td>0.3</td>
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<tr>
<td>Factor Weighting Points (Outer)</td>
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<td>0.6</td>
<td>0.5</td>
<td>0.5</td>
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<td>0.3</td>
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<td>Factor Weighting Points (Suburbia)</td>
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<td>Factor Weighting Points (Spare)</td>
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<tr>
<td>Factor Weighting Points (Ninjas)</td>
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<tr>
<td>Factor Weighting Points (Gnomes)</td>
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<tr>
<td>Factor Weighting Points (Bugs)</td>
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Note: When "future need" is defined to include remedies for existing affordability gaps, the theoretical needs is of a scale that is well above any reasonable level of supportable multifamily productivity for an eight-year period. However, the allocation of future needs might be reasonable across a 15-20 year timeframe.
EXAMPLE 3: DISTRIBUTION OF FUTURE GROWTH IN WORKFORCE HOUSING SUPPLY 2007-2015 (OWNERS AND RENTERS)

The model assigns the workforce portion of total growth to all communities based on the share factors. Workforce units include the projected increase in ownership units affordable at or below 100% of the AMFI, and rental units affordable at or below 60% of the AMFI. The model allocates regional growth projected for 2007-2015 to each community based on the allocation formula. The model could show a workforce goal total (per column J) or a breakout between owner and rental goals as shown in columns K and L. (In the example below, the own/rent split for each community is based on the regional proportion of need in each segment.)

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<th>MUNICIPALITY</th>
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<th>SHARE OF SRPC COMMERCIAL INDUSTRIAL LAND IN 2007</th>
<th>SHARE OF SRPC RESIDENT LABOR FORCE</th>
<th>SHARE OF SRPC INCOME</th>
<th>LOCAL SHARE OF NEW WORKFORCE UNITS BASED ON SHARING FACTORS</th>
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<table>
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<th>MUNICIPALITY</th>
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<tr>
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<td>Relative Weight of Factor</td>
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COMPOSITION OF NEEDS THAT ARE DISTRIBUTED WITHIN REGION

- 4.77: 2007-2015 GROWTH TO BE PROPORTIONATELY DISTRIBUTED
- 2.86: PROJECTED GROWTH - NUMBER OF HOMEOWNERS UNDER 100% AMFI
- 1.08: PROJECTED GROWTH - RENTERS UNDER 60% AMFI
- 4.172: WORKFORCE INCOME SECTOR - GROWTH IN SUPPLY 2007-2015
- 8,000: TOTAL HOUSING PRODUCTION (ALL RENTALS)
- 3%: WORKFORCE SHARE OF REGIONAL SUPPLY GROWTH

17
c. The City Health Officer continues to work with State Health officials, local landlords, and City Fire/Life-Safety officials to reduce the number of lead-based paint units in the City. This is an on-going action.

d. The City will continue to work proactively with the New Hampshire Housing Finance Authority when conditions merit such action. The City continues to work with the Strafford Regional Planning Commission in their Affordable/Workforce Housing Initiative regarding ways to achieve affordable housing for the City and the region as a whole. This is an on-going action.

e. In 2012, the City adopted new regulations which allow accessory dwelling units of between 300 and 800 square feet be allowed in all zoning districts where single family homes are allowed. This increases the availability of smaller rental units which may assist in improving the availability of affordable/workforce housing in Dover. In addition, the 2015 Land Use Analysis Master Plan suggests that household size will continue to decrease, and that the City needs to create innovative ways to encourage the private sector to construct smaller dwellings. Staff and the Planning Board will review options to create these incentives and remove barriers to smaller dwellings.

f. In follow up to the Land Use Analysis Master Plan, the City plans to draft a Transportation chapter. Part of this chapter will evaluate current options for transit in Dover, and look for ways to connect housing choice to transit, and review transit infrastructure.

**Affordable Housing Initiatives:**

The city funded The Housing Partnership in 2013 in its acquisition of a former warehouse which through low income tax credits will be converted to 42 low income housing units. The City provided $210,000.00 in financing for the approx. 9 million dollar project. The project was completed during the previous reporting cycle and 35 of the units were occupied as of the end of June. As of this program year, it is fully occupied.

The Dover Welfare Department and Community Partners were each awarded $8,000.00 for a security deposit assistance program. The program provides security deposits for low-income renters who cannot afford the security deposit on a rental unit. Dover Welfare provides deposits for their clientele and Community Partners provides deposits and emergency assistance for people with mental illness.
As a result of zoning work, accessory dwelling units (in law apartments) are allowed in all zones where single family residential units are allowed by right. This change updates a previous regulation which allowed conversion to allow ADUs solely in pre 1964 single family homes.

**Continuum of Care:**

The City of Dover has worked closely with the Strafford County Consortium in developing and updating the County’s Continuum of Care. One member of the City’s staff attend the consortium meetings. The Consortium will meet as necessary to update the Continuum of Care for Strafford County, as new gaps are identified or new services available for listing. The group will continue to meet on an as-needed basis to discuss pertinent issues and new funding announcements from HUD, the State and other agencies. It also acts as the disseminator of information to most of the local nonprofits.

**Other Actions:**

**I Special Needs of Persons who are not Homeless but Require Supportive Housing**

An $8,000.00 grant was provided to AIDS Response of the Seacoast, a non-profit organization that offers programs relating to the issue of AIDS. The funds were used for a Services Coordinator position.

A major objective and task of the AIDS organization is the provision of educational services. These services educate people on the subject of AIDS in an effort to get facts straight and alleviate common fears. By eliminating fears and misconceptions through education, discrimination toward people with AIDS is greatly reduced. In the 2014-15 program year, hundreds of Dover residents received educational services from AIDS Response to the Seacoast. In addition, 27 AIDS patients from Dover were served by the organization.

**II Obstacles to addressing underserved needs.**

While the City as a whole has come out of the down turned economy in a positive manner, for those with little to no advanced manufacturing skills continue to see a loss of jobs and light hiring The City is working with local banks to provide economic loans that create jobs for Dover residents. Furthermore, the City continues to review options for a locally funded business park. The City’s Economic Development Director has been very proactive in visiting Dover businesses and assisting with any financing issues as well as employment resources. He has also been active in trying to bring new businesses into Dover to help stimulate the local economy. Between January and July, the City permitted over 400,000 square feet of industrial use in a new public/private industrial park.
III Foster and Maintain Affordable Housing

The City supported the collaboration between Community Partners and the Dover Housing Authority to apply for Section 8 certificates for developmentally disabled clientele. Unfortunately the application was not awarded funding.

IV Mitigate Barriers to Affordable Housing

In December of 2010, the City revised the zoning in the downtown area, which eliminated unit density requirements along with parking requirements, thereby allowing developers to increase the density of units they can get on a piece of land or development; it also allows rooming houses in the downtown area and nearby. Additionally, density requirements and/or recreational land requirements based on the number of bedrooms has been eliminated and there is no minimum on the area of units other than the Building Code and the Life Safety Code regulations. The City received two planning grants from NHHFA utilized to review implementation of this zoning in other areas of the downtown corridor where it makes sense. This review resulted in rezoning of land over the past year.

V Mitigate Barriers in Institutional Structures

The City has continued to support the development and infrastructure in the McConnell Center. The Center houses many non-profits that offer support services to the City’s low and very low population. For many of the residents, it is one stop shopping, where they can receive public assistance, fuel assistance, subsidized day care, parenting classes, adult education, ESL classes, computer learning and it also includes a food pantry.

VI Public Housing and Resident Initiatives

Dover Housing Authority’s 458 units of public housing and 327 housing choice vouchers will continue to serve the area’s low- and extremely-low income population. In addition, the DHA has several public housing units designated specifically for use as transitional housing by Community Partners and My Friend’s Place as well as 30 Section 8 vouchers designated specifically for persons with disabilities.

The DHA’s housing stock is kept viable through HUD’s Capital Fund Program which grants funding for planned capital improvements and renovations. However, along with the decrease in rental subsidies, HUD is also cutting Capital Fund Program grant funding making it harder to maintain the public housing developments in decent, safe and sanitary condition. The DHA currently has a total of 493 applicants on its waiting lists. The DHA houses approximately 100 new applicants per year, leaving a shortage of over 400 affordable housing units.
**VII Resident Initiatives**

The DHA continues to seek funding to provide supportive services to all its residents. In 2011 the DHA was awarded Federal grant monies to continue the position of Senior Supportive Services Coordinator and Section 8 Family Self-Sufficiency Coordinator. In addition, the DHA was recently awarded Federal grant monies to create a new position of Public Housing Family Self-Sufficiency Coordinator. Together, these three employees will work to bring necessary services to the assisted housing population. Through a previous Federal grant, the DHA and Wentworth Douglass Hospital continue their collaborative program known as the “Hand in Hand Van”, which provides DHA elderly and disabled residents with transportation to medical appointments.

Over the past 15 years the DHA Senior Supportive Services Coordinator has successfully brought services and programs to public housing seniors and persons with disabilities, allowing them to live independently and avoiding premature institutionalization. Presentations and one-on-one interviews about Medicare Part D Program have been a major component of the past several years’ services. Exercise, health awareness, and computer literacy programs are among others.

Resident initiatives targeted for public housing families focus on improving residents’ employability and financial stability. After-school and enrichment programs for children and parents are offered at the DHA’s Seymour Osman Community Center.

In addition to owning and managing 458 public housing units, the DHA also manages 347 vouchers under the Section 8 Housing Choice Voucher (HCV) Program. The Section 8 HCV Family Self-Sufficiency Program Coordinator assists HCV participants in acquiring skills and experience to obtain employment, further their education, change their living environments and become free of public assistance.

**VIII Lead Based Paint Hazards**

The City’s community development program provides residents a copy of Protect Your Family from Lead in Your Home to any one that wants one. This brochure provides information on the danger of lead paint hazards and ways to minimize risk associated with them. Homeowners and first time homebuyers are advised of the availability of testing for elevated levels of lead in the blood of children. Dover has undertaken an assessment of existing housing programs funded with CDBG funds to implement necessary changes in policies and procedures. The following steps have been undertaken to ensure compliance with the new regulations while maintaining efficient program delivery: The City continues to work with the Community Action Program (CAP) to make free training in lead
safe work practices available to local contractors. Local building supply businesses are also offering this training for a fee. Local realtors have been advised of the issues concerning lead-based paint hazards and the applicable regulations.

The general public is being informed through the media and distribution of educational material about lead paint hazards and the new regulations as they apply to all renovation, repair and painting (RRP) federally funded programs.

The City inspected 1 housing unit for lead based paint hazards in the 2014-15 program year, and performed 1 risk assessments on a unit. As in the past, the City will continue to deal with these issues as they arise.

The Strafford County Community Action Committee’s Lead Based Paint Hazard Reduction program has been licensed by the State of New Hampshire to perform lead based paint work.

IX Compliance and Monitoring:

As a means of ensuring compliance of CDBG funded activities, Community Development has established the following monitoring plan to be used for sub-recipients.

1. Sub-recipients will be required to submit quarterly reports on their programs and activities. These reports will include information such as, the number of units completed, and/or persons served; the amount of funds expended; factors which adversely affect or hinder implementations; accomplishments of programs or activities.

2. The City will require written verification on the work accomplished with requests for funds prior to release of payment unless previous approval for advances has been granted in writing.

3. Annual site visits are be made to monitor record-keeping, reports and administration compliance.

The City continues to monitor its public service grant recipients on an annual basis and monitor all other activities for compliance with all applicable rules and regulations, including environmental reviews, Federal Labor Standards and benefit to low-moderate income persons.

X Reduce the number of families in Poverty:

The City over the past year has supported Economic Development and job creation in the City. Additionally, we have continued to support Dover Children’s
Center which supplies subsidized daycare, thereby allowing the parents to work and provide family income.

**Leveraging Resources:**

No matching funds were required for any of the CDBG activities. Strafford County Community Action’s weatherization program leveraged $33,000 in Eversource funds and DOE funds for owner occupied housing.

**Citizen’s Comments:**

The City received no Citizen’s comments on the Annual Performance Report. Any comments received before the end of the comment period will be forwarded to HUD.

**Self-Evaluation:**

The City is satisfied with this past years CDBG accomplishments. This year’s expenditures exceeded the grant amount. Due to the retirement of a long time staff, and some administrative issues, the City expenditure rate fell slightly short of the HUD requirements by not being below the required entitlement amount by May. The city did made great strides in reducing the amount of loan pool (Revolving Funds) funds available and moved its rehabilitation funds into the Economic loan fund. Some of the public facilities have lagged in completion though due to volunteer efforts and lack of adequate funding.

Dover is once again attempting to partner with NHHFA in a lead base paint grant from the Office of Healthy Homes and working on other affordable housing issues through the Continuum and the Dover Housing Authority

**Geographic Distribution of funds:**

There are no specific geographic areas within the City, targeted for assistance. CIAP Funds for Dover Housing Authority will be expended on specific public housing locations, all other programs will be offered on a citywide basis. While there are higher concentrations of low income residents within certain sections of the urban core, a sufficient number exist Citywide to warrant the expanded coverage.

In regard to minority populations, the City does not anticipate expending funds in any specific geographic area. Although there are no concentrations of minorities or an inordinate number of low-income residents located in specific areas, Census data does indicate that the Black population does appear to suffer a higher rate of poverty. This does not seem to appear in client cases of human service agencies.
### Action Plan

#### Priorities for FFY14:

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### Changes in Program Objectives

No changes to the program objectives were made over the past year. Federal resources are limited and spread throughout the needs of the community based on their priorities.

### Pursuit of Resources

The City was in contact with New Hampshire Housing Finance Authority and Community Action over the past year for lead funds for Dover and a planning grant provided by HUD.

### Affirmation that Funding was just to meet National Objectives

All expenditures of funds as indicated in the HUD 4949.3 were used for low/mod benefit.
Relocation Narrative
No project utilizing CDBG funds required tenant relocation.

Job Creation and Retention Narrative
Only one economic development loan was made during the last year. The business anticipates retaining 4 jobs by its expansion over the next year. The business was able to continue to operate in downtown Dover.

Home foreclosures in Dover/Strafford County

The effects of the down-turned economy have been modestly felt in Dover compared to the County overall. In comparison to other parts of the country, Dover is doing very well with foreclosures, delinquencies and bank REO. The area did not have the real estate speculation this time around that occurred in the late 1980’s.

Through September, there were 15 bank owned properties in the City, well down from a year ago. For the 2015 year to date, there were 189 foreclosures in Strafford County. Dover accounted for 26 of the total, or 13%. Dover accounts for approximately 25% of the housing in Strafford County as well as 24% of the population in the County. That being said, the lower foreclosure rate bodes well for the City. Dover remains toward the bottom of the States foreclosure list, which shows over 2,119 foreclosures statewide in 2015.

The Planning Office will continue to monitor, as needed, the number of foreclosures in the future occurring in Dover as well as the County. At this point, due to the low volume, the City will not be taking any steps to address the issue locally.

There are signs of the sub-prime housing loan rate crisis having an effect on the state. 18,000 mortgages were listed as delinquent as of the end of March 2008, according to the New Hampshire Housing Finance Authority. By way of comparison, the delinquency rate for prime loans stands at 4.2%, with less than 1% already foreclosed upon, while (the smaller number of) sub-prime loans reported a delinquency rate of 19.5%, with approximately 7% already foreclosed upon. The loan crisis is coupled with rising costs in transportation and food.
IDIS Reports
U.S. Department of Housing and Urban Development

MASSACHUSETTS STATE OFFICE, NEW ENGLAND AREA
Office of Community Planning and Development
Thomas P. O'Neill, Jr. Federal Building
10 Causeway Street - Fifth Floor
Boston, Massachusetts 02222-1092

Christopher Parker, AICP
City of Dover
Department of Planning and Community Development
288 Central Avenue
Dover, NH 03820

Dear Mr. Parker:

Subject: FY 2014 Consolidated Annual Performance and Evaluation Report (CAPER)

We have reviewed and approved the City of Dover’s Consolidated Annual Performance and Evaluation Report (CAPER) for the program year July 1, 2014 to June 30, 2015. Based on the information provided, we find Dover’s FY 2014 CAPER to be consistent with the City’s Five Year Consolidated Plan and One Year Action Plan for FY 2014. The narrative describes how the City is working to meet the goals identified in the plans as well as proposed versus actual outcome results. We also find the City to be within the 15% cap for public services and the 20% cap for planning and administration for the Community Development Block Grant Program.

As a result of our review, we have determined that the City of Dover has carried out its activities and certifications in a timely manner, consistent with the requirements and primary objective of the Housing and Community Development Act of 1974, as amended, and with other applicable laws and program requirements. Pursuant to 24 CFR 570.905, we find that the City of Dover has the continuing capacity to carry out its activities in a timely manner based on the information provided in the City’s CAPER.

Please remember that a copy of this letter must accompany all copies of the CAPER. If you have any questions or if we can be of any assistance, please contact your CPD Representative, Adam Ploetz at 617.994.8351 or adam.c.ploetz@hud.gov.

Sincerely,

Robert D. Shirey
Director