

BARNSTABLE COUNTY HOME CONSORTIUM CONSOLIDATED ANNUAL PERFORMANCE EVALUATION REPORT (CAPER) PROGRAM YEAR 2018 (July 1, 2018 through June 30, 2019)

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The Barnstable County HOME Program has been actively participating in the development of multi-family affordable rental housing with many projects being completed; in the process of being completed; or starting construction in the last several years. Additionally, there are several other affordable rental housing developments in the pipeline. This seems to be a good use of Barnstable County's limited HOME funds. In Program Year 2018, fifteen (15) HOME Rental units were completed. An additional total of fifteen (15) HOME Rental units in two projects have committed funds and are in the process of being constructed; and two other projects consisting of a total of nineteen (19) HOME Rental units has just be conditionally awarded funds. It is noted that for the purposed of this Consolidated Annual Performance Evaluation Report ("CAPER") only those projects that have been **completed** within a program year are counted for that program year. As rental development activities may take up to two years from initial funding date to completion date, it is important to note the current and pending development projects. To date, 69 affordable rental units have been **completed** during the current Strategic Plan.

The Barnstable County HOME Program set a goal of 5 CHDO Housing Production Units per year, but has been unable to meet that goal due to a lack of possible CHDO entities seeking project funding. The last CHDO development was initiated in 2013 and completed in May of 2016 which consisted of 11 affordable rental units. The Barnstable County HOME Consortium has been actively attempting to recruit a CHDO to collaborate with on funding; however after meeting with several non-profit entities, there does not appear to be any appetite for the creation of a CHDO. The Barnstable County HOME Program will continue to try to foster relationships with local non-profits for CHDO development.

The Barnstable County HOME Program is reporting 2 Homebuyer Assistance (DPCC) activities for PY18. However, it is noted that in reviewing the last CAPER for PY17, 4 DPCC activities were reported for PY17 but were actually completed in PY18. So as to not report duplicate progress activities, we are not reporting those 4 DPCC activities which are shown on the completion report for PY18. The goal for DPCC is 5 units per year / 25 for the five-year strategic plan. To date, under the current five-year strategic plan, the Barnstable County HOME Program has completed a total of 44 DPCC activities, far surpassing its goal of 25 units.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and

explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee’s program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
CHDO Housing Production	Affordable Housing Homeless	HOME: \$	Rental units constructed	Household Housing Unit	25	11	44.00%	5	0	0.00%
Homebuyer Assistance (DPCC)	Affordable Housing	HOME: \$	Homeowner Housing Added	Household Housing Unit	0			0		
Homebuyer Assistance (DPCC)	Affordable Housing	HOME: \$	Direct Financial Assistance to Homebuyers	Households Assisted	25	44	176.00%	5	2	40.00%
Rental Housing Production	Affordable Housing	HOME: \$	Rental units constructed	Household Housing Unit	100	69	69.00%	20	15	75.00%
Tenant Based Rental Assistance	Affordable Housing Homeless Non-Homeless Special Needs	HOME: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	10	0	0.00%			

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan,

giving special attention to the highest priority activities identified.

The Barnstable County HOME Consortium continues to provide funding for affordable rental housing development to provide affordable housing for families earning less than 30% AMI and for families earning less than 65% AMI. In addition, the HOME Program provides downpayment and closing cost assistance to assist homeowners earning less than 80% AMI purchase a first moderate priced home. Barnstable County does not administer CDBG funds.

DPPC CORRECTION

As stated herein, the actual number of DPCC activities completed in PY18 was six (6) units. However, as four (4) of these units was erroneously entered on last year's (PY17) CAPER, we are only reporting two (2) for this PY18 so as to not over report DPCC activity.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	HOME
White	15
Black or African American	2
Asian	0
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	0
Total	17
Hispanic	1
Not Hispanic	16

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
HOME	public - federal	556,344	104,567

Table 3 - Resources Made Available

Narrative

The resources available was determined based on the 2018 Annual Action Plan's \$481,905 allocation plus prior year's resources of \$37,939 and then added actual program income received during PY18 of \$36,500 for a total of \$556,344. Out of the \$104,567 funds expended in PY18, \$48,227 was expended on project activity (\$40,268 on DPCC activities and \$7,960 on Rental Development activities) and \$56,339 expended on Administration. However, it should be noted that in PY18, two rental development projects received commitments and have begun construction: Cape Cod Village in Orleans (\$250,000) and Little Pond Place in Falmouth (\$140,000). In PY19, Cape Cod Village has received its first drawdown of \$100,000 and Little Pond Place is expecting to draw soon. Additionally, the Canal Bluffs III rental development project in Bourne has just finalized completion and has received its last drawdown of \$25,000. And lastly, two other rental development projects have just recently received their conditional commitments: Terrapin Ridge in Sandwich (\$250,000) and Yarmouth Gardens in Yarmouth (\$150,000). So there are numerous active rental development projects expected to proceed through to completion in PY19 and PY20. See attached Cape Cod Times opinion article dated August 27, 2019 regarding positive housing activity on the Cape.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Barnstable County	100		Region

Table 4 – Identify the geographic distribution and location of investments

Narrative

Barnstable County is comprised of fifteen towns and all towns are included in the target area. For Program Year 2018, two rental developments were completed; one in Bourne and one in Wellfleet. And the two reported DPCC activities for PY18; one in Dennis and one in Yarmouth.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

HUD has allowed HOME Consortia in Massachusetts to use the Massachusetts Rental Voucher Program (MRVP) expenditures in the consortia communities as a source to count toward the 25% match requirement. For 2018 Housing Assistance Corporation, the region's primary administrative issuing agency for MRVP vouchers, reported that it had expended \$367,097 in Barnstable County MRVP vouchers. The Barnstable County HOME Consortium has over \$25 million in excess match credit that it has accumulated over the history of the County HOME program. The Barnstable County HOME Consortium, as in prior years, exceeded its match requirement through the use of the state's Mass Rental Voucher Program funds that were expended in the region and administered by the Housing Assistance Corporation.

Additionally, the HOME Program's federal funds leverage additional state and local fund as follows: Mostly all of Barnstable County's HOME Program's affordable rental housing development receives various state funding. And many receive Local Community Preservation Funds ("CPA") funds which are available in all fifteen towns and local Housing Trusts funds. Additionally many towns have obtained land that is donated land to the development of affordable housing.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	24,821,987
2. Match contributed during current Federal fiscal year	367,097
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	25,189,084
4. Match liability for current Federal fiscal year	153,937
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	25,035,147

Table 5 – Fiscal Year Summary - HOME Match Report

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match
MRVP	10/01/2018	0	0	0	0	0	0	367,097

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at begin-ning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
3,819	36,500	37,089	0	3,230

Table 7 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Dollar Amount	15,666,876	0	0	0	0	15,666,876
Number	2	0	0	0	0	2
Sub-Contracts						
Number	63	0	0	1	3	59
Dollar Amount	13,197,341	0	0	348,855	405,073	12,443,413
	Total	Women Business Enterprises	Male			
Contracts						
Dollar Amount	15,666,876	0	15,666,876			
Number	2	0	2			
Sub-Contracts						
Number	63	2	61			
Dollar Amount	13,197,341	155,328	13,042,013			

Table 8 - Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	2	0	0	0	0	2
Dollar Amount	700,000	0	0	0	0	700,000

Table 9 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired		0		0		
Businesses Displaced		0		0		
Nonprofit Organizations Displaced		0		0		
Households Temporarily Relocated, not Displaced		0		0		
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

Table 10 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	29	17
Number of Special-Needs households to be provided affordable housing units	1	0
Total	30	17

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	25	15
Number of households supported through Rehab of Existing Units	0	0
Number of households supported through Acquisition of Existing Units	5	2
Total	30	17

Table 12 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

The Barnstable County HOME Program set a one-year goal of the production of 25 new units; five of which was to be created by a CHDO development. For PY18, the HOME Program completed 15 new units of rental developments; none of which were CHDO developments. We were not able to meet our goal of the creation of 5 CHDO rental units as there is currently no CHDO development opportunities in Barnstable County. Additionally, in discussions with local non-profit developers there does not seem to be an appetite for CHDO-funded projects. As to our goal of creating 20 other new affordable housing

units, we completed 15 new units. However, an additional 15 new units are presently under construction and another 19 units have been conditionally awarded Barnstable County HOME funds. As to the Acquisition of Existing Units through the Barnstable County HOME Program's DPCC activity. Two units have been reported for PY18. However, an additional 4 units that were completed in PY18 were erroneously reported in the 2017 CAPER. The 2017 CAPER reported a total of 13 DPCC units. Thus in the two years, a total of 15 DPCC units were completed, exceeding our annual goal.

Discuss how these outcomes will impact future annual action plans.

During the last several years, the production of affordable rental housing on the Cape has increased as the need has increased coupled with several towns revising their local zoning bylaws to allow for multi-family development. Thus the production of rental units has been a priority. Contrarily, with the increase in housing prices on the Cape, it had proven difficult, especially recently, to assist homeowners acquire first time homes under the DPCC program activity. The 95% moderate home under the DPCC program at \$333,000 after rehab coupled with locating an 80% AMI purchaser to qualify for the required loan has proven extremely difficult, especially in the lower and outer Cape region.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	0	13
Low-income	0	2
Moderate-income	0	2
Total	0	17

Table 13 – Number of Households Served

Narrative Information

With the increase of multi-family affordable housing rental development in recent years on the Cape, the Barnstable County HOME Program has been able to leverage their funds with other state and local funding sources to provide rental opportunities for our extremely low-income and low-income families.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

Several participating CoC agencies incorporate street outreach programs, including Vinfen, Duffy Health Center, Housing Assistance Corporation, and Homeless Prevention Council. Outreach staff are specially trained to interact with unsheltered populations and to assess them for services utilizing the Vulnerability Index - Service Prioritization Decision Assistance Tool (VI-SPDAT), a survey administered both to individuals and families to determine risk and prioritization. Street outreach providers are expected to engage those persons that have been resistant to accepting an offer of housing or services and to follow a low barrier engagement approach.

Addressing the emergency shelter and transitional housing needs of homeless persons

The local emergency assistance shelters and transitional housing programs (including a project dedicated to veterans) participate in the CoC's HMIS. The emergency shelter for individuals (St. Joseph's House) operates with a low barrier threshold and coordinates with health care and social service providers to assist shelter guests in transitioning out of shelter into housing. Client level demographic data, client assessments, numbers and configurations of beds, client utilization, and current openings / availability are tracked through HMIS.

The Regional Network on Homelessness / CoC has organized an ad hoc Emergency Services Committee attended by numerous local service agencies to address the need for emergency shelter options for unsheltered homeless individuals during extreme weather events when overflow beds at the emergency shelter are filled/occupied. Strategies have been developed to leverage local resources for the short term (i.e., one-night motel vouchers, designated regional shelters). The Committee continues to plan for sustainable solutions to build capacity of existing systems to address the need to shelter all of the homeless during weather related events.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that

address housing, health, social services, employment, education, or youth needs

With the increase of multi-family affordable housing rental development in recent years on the Cape, the Barnstable County HOME Program has been able to leverage their funds with other federal, state and local funding sources to provide rental opportunities for our extremely low-income and low-income families. Most of the multi-family affordable rental housing developments consists of a high number of their rental units being set aside for extremely low-income and low-income families and include project based Section 8 vouchers, Section 811 vouchers, and CBH units.

This year, the Sandwich Housing Authority and Falmouth Housing Authority received MainStream vouchers that were dedicated to people with disabilities leaving institutions such as nursing homes. The vouchers are paired with community based services to increase the likelihood of a successful housing placement and housing stability.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

In 2017 HUD introduced the housing grant project category of DedicatedPLUS to provide CoCs with more flexibility to serve vulnerable populations and to more effectively and more immediately address the needs of persons experiencing chronic homelessness, at risk of experiencing chronic homelessness, or who were chronically homeless prior to being housed and who have recently become homeless again. HUD encourages CoCs to continue adopting prioritization standards based on the length of time a potential program participant resided on the streets, in an emergency shelter, or in a safe haven, along with the severity of their service needs.

The CoC partners with the McKinney-Vento School Liaisons in every school district on the Cape and Islands and with the Cape Cod Community College in order to identify unaccompanied homeless youth and to offer them housing and stabilization services. Provider organizations in the CoC (e.g. Duffy Health Center, a health care for the homeless agency) also work closely with the House of Corrections on a re-entry task force to assist those leaving the House of Correction find housing and community based supports.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

Thirteen of the fifteen towns of Barnstable County now have local housing authorities that address the needs of low-income housing. Oftentimes, the Barnstable County HOME Consortium combines funding with the local housing authorities in multi-family affordable housing rental development to provide rental housing for low and very-low income residents. Most of the local housing authorities on Cape Cod do not have federally funded housing.

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

This question was asked of all the local housing authorities during the preparation of the PY19 Annual Action Plan, no responses were received.

Actions taken to provide assistance to troubled PHAs

This question was asked of all the local housing authorities during the preparation of the PY19 Annual Action Plan, no responses were received.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

The Barnstable County HOME Consortium has initiated a roundtable discussion at its HOME Advisory Council meetings wherein each member provides an overview of his or her town's issues facing the development of affordable housing and its successes and failures and discuss regional policies in conjunction with the Cape Cod Commission in an attempt to provide regional solutions to known barriers. The Advisory Council is made up of a member representative from each of the fifteen towns, two at-large members, and includes the Affordable Housing Specialist of the Cape Cod Commission as an ex officio member.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

Currently, the most significant obstacle on Cape Cod is the high cost of land due to current zoning which favors larger single-family lot housing development; and the high home sales prices due to a higher percentage of second home ownership which drives up the housing prices. Additionally, with the substantial increase of seasonal Air B&B properties on the Cape, year-round housing has become a scarce commodity. To address some of these obstacles to meeting the needs of our low to moderate-income year-round residents, the Cape Cod Commission is actively working with communities to change their zoning, particularly in village center areas, to accommodate greater density and to provide for the creation of year-round accessory dwelling units. Additionally, many of the non-profit affordable housing advocates are compiling information on the cause and negative effect of increasing seasonal homes and rental units in the region.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

While the cost of lead paint removal can potentially be prohibitively expensive, the Consortium will vigorously enforce the revised 2002 lead-based paint regulations for all its program activities and will continue to support efforts of local organizations to attract lead paint removal resources to the region.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

In addition to dedicating HOME Program funds to rental housing for extremely low-income households, and encouraging the set aside of housing vouchers for homeless or at risk homeless individuals/households, the Consortium supports all efforts in the region, and works with individual towns, to protect low income households in deed restricted ownership units from losing their affordable restricted units through foreclosure.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

Barnstable County has co-located the HOME Program and the Continuum of Care program under the Department of Human Services. The Cape Cod Commission's Affordable Housing Specialist participates in the HOME Advisory Council meetings, as well as meets with HOME staff monthly to discuss local/regional affordable housing issues that are affecting the region. The member towns of the HOME Consortium are able to contact the HOME Program Manager and/or the Cape Cod Commission to seek guidance and assistance with any affordable housing issues or questions which provides a regional informational source.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

The Barnstable County HOME Program HOME Advisory Council meetings maintains communication between the fifteen towns and serves as an information resource center for the Cape. Barnstable County HOME Program staff plans to meet with local and regional affordable housing advocates and social service agencies over the course of the year to gather information on the needs of the region and on the barriers to meeting those needs.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

The Barnstable County HOME Program requires all affordable housing rental developers and project managers to have an approved Affirmative Marketing and Tenant Selection Plan which includes a list of criteria that will be used in the selection of tenants. Compliance with adherence to this Plan is monitored by the Barnstable County HOME Program's Monitoring agent.

CR-40 - Monitoring 91.220 and 91.230

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

See Barnstable County HOME Program's rental Housing Development Monitoring Policy in the Attachments. Additionally, the Barnstable County HOME Program requires as a condition of funding that all HOME projects must have Section 3 and MBE/WBE outreach and reporting plans in place before closing. The HOME Program also requires as a condition of funding that the developer submit an Affirmative Fair Housing and Marketing Plan and Tenant Selection Plan.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

The public outreach efforts are detailed in the Citizen Participation Plan attachment.

CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

Please see the FinePoint Onsite Monitoring Report in the Attachments

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)

Notices of Public Hearings and Document Availability of the Barnstable County's HOME Consortium's Annual Action Plans, CAPERS, and Consolidated Plans are provided in English, Spanish, and Portuguese and are posted in the Barnstable County Human Services Department E-Newsletter that has a subscriber list of over 2,800 individuals who are generally in the Human Services fields across Cape Cod and the Islands including minority organizations and organization working with low-income residents. The Notice in English is published in the Cape Cod Times as required by the Citizen's Participation Plan. Additionally, as part of the scheduled monitoring of rental development projects, the monitoring agent reviews the property management's implementation of policies and procedures to affirmatively further fair housing and for compliance with an approved Affirmative Fair Housing Marketing Plan and tenant selection.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

The Barnstable County HOME Program used \$37,089 in program income for PY18 to help complete the two DPCC units that were reported in this 2018 CAPER and was also used to help create three of the other DPCC units that were erroneously report in the 2017 CAPER. In all, this money assisted five families earning less than 80% of the Area Median Income purchase first homes. The owner characteristics consisted of one minority single-parent household with three children; two (2) two-parent households with a total of four children; and two (2) single-parent households with a total of three children.

Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)

The Cape Cod Commission, through its regulatory program requires housing development that require

regional review to allocate 10% of units created for affordable and workforce housing. For commercial projects requiring regional review, the Commission may require an economic analysis to calculate the expected demand for affordable housing the development is expected to generate given the type of business(s) to be housed and wages earned. The Commission may require the development to mitigate the impact, usually in the form of a cash payment to be used by the municipality and other housing agencies to create affordable housing in the region. Additionally, the Barnstable County HOME Program staff notifies individual towns, local housing authorities, and local affordable housing advocates when potential loss of affordable housing units due to foreclosure, bankruptcy, or other financial distress is brought to the County's attention in an effort to bring together the necessary stakeholders to attempt to save the units.