



**2019-2020 ANNUAL ACTION
PLAN**

ANNUAL ACTION PLAN

2019-2020 Program Year

August 1, 2019 to July 31, 2020

Presented to the U.S. Department of Housing and Urban Development
Portland Field Office of Community Planning and Development

CITY OF LEWISTON, IDAHO

DUNS #040197261

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EXECUTIVE SUMMARY

AP-05 EXECUTIVE SUMMARY – 24 CFR 91.200(C), 91.220(B)

INTRODUCTION

The City of Lewiston Consolidated Plan (2018-2022) outlines the community's strategies for meeting its identified housing and community development needs, developed through a citizen participation process. The five-year Plan includes a needs assessment, market analysis, identification of priority needs, and long-term strategies. An Annual Action Plan implements the strategies and provides a basis for allocating Community Development Block Grant (CDBG) resources. This document, the City of Lewiston's program year 2019-2020 CDBG Action Plan, represents the goals and programming of funds for activities to be undertaken in year two of the five-year Consolidated Plan.

SUMMARIZE THE OBJECTIVES AND OUTCOMES IDENTIFIED IN THE PLAN

Priority needs were developed based on citizen participation and stakeholder consultation, and analysis of the city's top housing, homeless, special needs populations, and non-housing community development needs in the 2018-2022 Consolidated Plan. The following goals for year two of the Consolidated Plan are in accordance with the five-year Strategic Plan to guide the community's allocation of CDBG resources from 2019-2020.

Priority needs identified in the 2018-2022 Consolidated Plan are as follows:

1. Housing Affordability

- Support the development of affordable rental and owned housing, including projects located near employment and transportation;
- Extend the useful life of existing affordable housing through weatherization, repair, and rehabilitation programs.

2. Homelessness and Homelessness Prevention

- Assist persons who are homeless through emergency, transitional, and permanent housing and supportive services;
- Assist households at risk of homelessness.

3. Non-Housing Community Development

- Fund non-housing community development activities that eliminate blight, improve safety, and support new affordable housing development, such as sidewalk construction and repair, street

improvements, transportation improvements, ADA improvements, and other allowable infrastructure or facility improvements not listed here.

4. Public Services and Economic Opportunity

- Fund projects that provide supportive services to low and moderate-income households, as well as special needs populations. Includes, but is not limited to medical and dental services, childcare, mental health and substance abuse services, services for victims of domestic violence, transportation assistance, and other allowable public services not listed here.

5. Fair Housing Education and Enforcement

- Provide fair housing education activities to the general population and vulnerable groups;
- Fund targeted fair housing activities such as complaint handling services and enforcement.

6. Program Administration and Planning

- Funding for performance of administrative and planning requirements of the CDBG program.

EVALUATION OF PAST PERFORMANCE

The City has historically managed a CDBG homeowner rehabilitation program (SNAP). The program had great success in improving/maintaining the single-family housing stock and in reducing maintenance and operation costs for low and moderate-income homeowners. However, lead-based paint hazard testing/abatement/certification requirements had proved to be both costly to implement and beyond the City's capacity to administer, given the small and declining CDBG budget. Because of this assessment, the City suspended the SNAP program until approaches that were more feasible were fully explored. Evaluation of needs in this Plan and implementation capacity pointed to other methods to meet these requirements, such as sharing of testing equipment and contracting with another agency in the community, which operates a rehabilitation program.

Because of administrative burden associated with managing multiple programs within the City's limited CDBG budget, the City has determined that fewer programs and programs that involve brick and mortar activities are most cost-effective. Therefore, the City generally selects a few capital improvement projects each program year that are undertaken by various non-profit organizations with good records of accomplishment for effectively serving low to moderate-income persons and families. The City has also routinely performed program administration in-house with a very small annual award percentage and undertaken a few of its own infrastructure and ADA accessibility projects to maximize the LMI benefit of its limited amount of CDBG dollars.

SUMMARY OF CITIZEN PARTICIPATION PROCESS AND CONSULTATION PROCESS

The City of Lewiston reached out and consulted with local groups, organizations and units of governments as listed in 24 CFR 91.100, 200 and 220. District Health was contacted to discuss lead poisoning and monitoring in children, as well as services for persons with HIV/AIDS. Upon contacting the District Health, information was shared that the City of Lewiston has very slim resources for persons with HIV/AIDS. City of Lewiston reached out to the North Idaho Aids Coalition to find more information about services and resources for persons with HIV/AIDS in the Lewiston Valley.

Consultation with individuals occurs throughout the year when they present themselves at the Building Permit or Business license counters. Staff has been trained to raise the issue of CDBG funding when the project is located in an LMI area or will serve LMI clientele. This helps increase awareness of the program, but it does not assist with batching requests for funding. Staff also sent out emails regarding information for the Community Housing Rehabilitation Program to City Employees, Planning & Zoning Commission, Lewiston Interagency, Community Action Partnership and to HVAC, Electrical and other contractors.

The City of Lewiston received its allocation amount on April 16, 2019. An advertisement was placed in the local newspaper and on the City's website that solicited proposals for 2019-2020 projects. Once activities were selected for programming, another advertisement was published on May 5, 2019, which described the activities as well as the public hearing date, and solicited comments during the 30-day public comment period.

A public hearing was held on June 10, 2019 and the City Council approved the 2019-2020 Action Plan (note any changes or amendments).

SUMMARY OF PUBLIC COMMENTS

SUMMARY OF COMMENTS OR VIEWS NOT ACCEPTED AND THE REASONS FOR NOT ACCEPTING THEM

All comments or views are accepted.

PR-05 LEAD & RESPONSIBLE AGENCIES – 91.200(B)

AGENCY/ENTITY RESPONSIBLE FOR PREPARING/ADMINISTERING THE CONSOLIDATED PLAN

TABLE 1 – RESPONSIBLE AGENCIES

Agency Role	Name	Department/Agency
Lead Agency	City of Lewiston	Community Development Department

NARRATIVE

The City of Lewiston's Community Development Department is responsible for administering the City's Community Development Block Grant Program. Among other City responsibilities, the Department coordinates the planning process, works closely with agencies and nonprofit organizations on planning and implementation, manages the CDBG program and resources to meet HUD requirements, evaluates project progress, and reports on performance to the City Council and HUD. A wide range of local housing and service provider's partner with the City to carry out activities identified in the Annual Action Plan.

CONSOLIDATED PLAN PUBLIC CONTACT INFORMATION

The primary contact for the Lewiston CDBG Program is:

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AP-10 CONSULTATION – 91.100, 91.200(B), 91.215(L)

INTRODUCTION

The City of Lewiston conducted a variety of public outreach to garner input from city staff, government agencies, nonprofit agencies, affordable housing developers and managers, local service providers, and Lewiston residents in preparing the 2018-2022 Consolidated Plan. The City held a community meeting open to the public; conducted four focus groups for low and moderate-income households, homeless persons, seniors, and people with disabilities, and interviewed key stakeholders in person and by phone. Additionally, local residents and other stakeholders completed surveys regarding community development and housing priorities. A total of 35 people attended the meeting and focus groups, 55

people completed the survey, and 19 people participated in an interview. Results of these outreach efforts are summarized in the Community Participation section of this plan.

As listed in 24 CFR 91.100, 200, and 220, the City of Lewiston consulted with local groups, organizations and units of government. Consultation with individuals occurs throughout the year when persons present themselves at the Building Permit or Business License counters. Staff has been trained to raise the issue of CDBG funding when the project is located in an LMI area or will serve LMI clientele. This helps increase awareness of the program, but it does not assist with batching requests for funding.

PROVIDE A CONCISE SUMMARY OF THE JURISDICTION’S ACTIVITIES TO ENHANCE COORDINATION BETWEEN PUBLIC AND ASSISTED HOUSING PROVIDERS AND PRIVATE AND GOVERNMENTAL HEALTH, MENTAL HEALTH AND SERVICE AGENCIES (91.215(L))

The City strove to include both housing providers and health, mental health, and other service agencies in the development of the Consolidated Plan. Over 35 stakeholders were invited to participate in interviews and flyers advertising the public meeting and survey were sent to 72 local organizations by mail or email. These included nonprofit housing developers, the Idaho Housing and Finance Association, homeless service providers and food pantries, community service providers, transit providers, and school system representatives. The public meeting and focus groups allowed group discussions of the connections between housing and other community needs. The Consolidated Plan was designed to promote enhanced coordination amongst local housing and service organizations over 2018-2022 program years.

Throughout the year, City of Lewiston staff meets with other representatives of various non-profit, public, and private agencies that serve the needs of the homeless, persons at risk of homelessness, persons with mental health conditions, the disabled and other low to moderate income persons. Many of these representatives participate in meetings of the Lewis-Clark Interagency Council, Lewiston-Clarkston Homeless Coalition Task Force hosted by the YWCA, and Housing Roundtable meetings hosted by Idaho Housing and Finance Association. The City continues to consult with agencies and others to seek future opportunities for effective expenditure of CDBG funds to the benefit of LMI persons.

DESCRIBE COORDINATION WITH THE CONTINUUM OF CARE AND EFFORTS TO ADDRESS THE NEEDS OF HOMELESS PERSONS (PARTICULARLY CHRONICALLY HOMELESS INDIVIDUALS AND FAMILIES, FAMILIES WITH CHILDREN, VETERANS, AND UNACCOMPANIED YOUTH) AND PERSONS AT RISK OF HOMELESSNESS.

The City of Lewiston is a member of the balance of state Continuum of Care staffed by the Idaho Housing and Finance Association and provides input regarding local homeless needs and risk of homelessness. In development of the five year Consolidated Plan, the City consulted with several local service providers who work with homeless and at risk populations, including Family Promise, YWCA, Community Action Partnership, and the ROC Rescue Mission. Community Action Partnership and the ROC Rescue Mission also held focus groups at their facilities to discuss the needs of homeless households and those at risk of

homelessness, including chronically homeless individuals and families, families with children, veterans, and unaccompanied youth. The ROC Rescue Mission will close its doors on May 31, 2019 due to its inability to maintain operations with available resources, lack of community support and lack financial assistance to operate their facility.

The City will continue to look for opportunities to forge partnerships with social service agencies, housing developers/managers, and organizations serving special needs populations including elderly, people with disabilities, and youth. Funding for these agencies will be made available.

- City staff participates in meetings of the Lewiston-Clarkston Homeless Coalition Task Force (which provides homeless planning and coordination in the valley) to discuss needs and barriers facing homeless persons in Lewiston.
- City staff participates in the Region II Housing Roundtable meetings hosted by Idaho Housing and Finance Association.
- City staff attends the Lewis-Clark Interagency Council meetings.
- City staff consulted with publically funded institutions about their discharge planning process.
- City staff consulted with organizations that provide services to persons with HIV/AIDS.

In the past, the City has regularly funded projects for homeless persons and those in need of permanent affordable housing such as:

- Salvation Army (Commercial Kitchen, Hygiene Center);
- YWCA (new roof and HVAC in the main building, purchase of six units);
- Family Promise (duplex and van);
- Habitat for Humanity (lot purchase, infrastructure to five lot subdivision);
- Rehabilitation (Seapointe Apartments); and
- New construction (Kinsale).

DESCRIBE CONSULTATION WITH THE CONTINUUM(S) OF CARE THAT SERVES THE JURISDICTION'S AREA IN DETERMINING HOW TO ALLOCATE ESG FUNDS, DEVELOP PERFORMANCE STANDARDS FOR AND EVALUATE OUTCOMES OF PROJECTS AND ACTIVITIES ASSISTED BY ESG FUNDS, AND DEVELOP FUNDING, POLICIES AND PROCEDURES FOR THE OPERATION AND ADMINISTRATION OF HMIS

The Idaho Housing and Finance Association (IHFA) administers Idaho's balance of state Emergency Solutions Grant (ESG), which is available to local governments or nonprofit organizations through competitive application process. ESG funds are intended to support Idaho's Continuum of Care goals by preventing homelessness, rapidly rehousing the homeless, and providing emergency shelter for homeless individuals and families. IHFA also serves as the staffing entity for the balance of state Continuum of Care, of which Lewiston is a member.

As a member of the Continuum of Care, the City of Lewiston provides input regarding local needs and priorities related to homelessness. However, the City does not allocate or administer any ESG funds.

DESCRIBE AGENCIES, GROUPS, ORGANIZATIONS AND OTHERS WHO PARTICIPATED IN THE PROCESS AND DESCRIBE THE JURISDICTION’S CONSULTATIONS WITH HOUSING, SOCIAL SERVICE AGENCIES AND OTHER ENTITIES

In addition to obtaining input from City staff, the City also advertised the planning process and ways to get involved in *The Lewiston Tribune*, on City and Community Development Department webpages, and through flyers placed in public places. Twenty-six representatives from various agencies participated in the planning process; they are listed in Table 2 along with the areas of the Plan for which they provided input.

IDENTIFY ANY AGENCY TYPES NOT CONSULTED AND PROVIDE RATIONALE FOR NOT CONSULTING

Efforts were made to consult as broad a group of community stakeholders as possible. No agency types were excluded from participation.

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TABLE 2 – AGENCIES, GROUPS, ORGANIZATIONS WHO PARTICIPATED

Agency/Group/Organization Name	Type	Section of Plan Addressed	Consultation Method
1	Assist 2 Sell	<ul style="list-style-type: none"> • Housing need assessment • Non-homeless special needs • Market analysis 	<ul style="list-style-type: none"> • Interview
2	Beautiful Downtown Lewiston	<ul style="list-style-type: none"> • Housing need assessment • Market analysis • Non-housing community development strategy/economic development 	<ul style="list-style-type: none"> • Interview
3	Century 21	<ul style="list-style-type: none"> • Business leader • Other – Realtor 	<ul style="list-style-type: none"> • Interview
4	Community Action Partnership (2 representatives)	<ul style="list-style-type: none"> • Housing • Services (children, elderly people, people with disabilities, people with HIV/AIDS, victims of domestic violence, homeless, education, employment) • Regional organization • Planning organization 	<ul style="list-style-type: none"> • Focus groups •
5	Family Promise of Lewis-Clark Valley	<ul style="list-style-type: none"> • Housing • Services (homeless) 	<ul style="list-style-type: none"> • Interview
6	Infinity Management	<ul style="list-style-type: none"> • Housing 	<ul style="list-style-type: none"> • Public meeting
7	Intermountain Fair Housing Council	<ul style="list-style-type: none"> • Services (fair housing) • Other – legal advocacy 	<ul style="list-style-type: none"> • Interview

Agency/Group/Organization Name	Type	Section of Plan Addressed	Consultation Method	
8	Lewis Clark Chamber of Commerce	<ul style="list-style-type: none"> • Regional organization • Planning organization • Civic leaders • Business leaders • Other – economic development 	<ul style="list-style-type: none"> • Housing need assessment • Market analysis • Non-housing community development strategy/economic development 	<ul style="list-style-type: none"> • Written comments
9	Lewis-Clark State College Adult Learning Center	<ul style="list-style-type: none"> • Services (education, employment) • Other – economic development 	<ul style="list-style-type: none"> • Market analysis • Non-housing community development strategy/economic development 	<ul style="list-style-type: none"> • Interview
10	Lewis Clark Valley MPO	<ul style="list-style-type: none"> • Other government (local) • Other – transportation • Regional organization • Planning organization 	<ul style="list-style-type: none"> • Non-homeless special needs • Non-housing community development strategy 	<ul style="list-style-type: none"> • Interview
11	Lewiston City Council members (2 council members)	<ul style="list-style-type: none"> • Civic leaders 	<ul style="list-style-type: none"> • Housing need assessment • Homelessness strategy • Non-housing community development strategy/economic development • Market analysis • Other – fair housing 	<ul style="list-style-type: none"> • Interviews
12	Lewiston Planning Services Division (2 representatives)	<ul style="list-style-type: none"> • Housing • Other government (local) • Planning organization 	<ul style="list-style-type: none"> • Housing need assessment • Homelessness strategy • Non-housing community development strategy/economic development • Market analysis • Fair housing 	<ul style="list-style-type: none"> • Interviews
13	Lewiston Independent School District	<ul style="list-style-type: none"> • Services (children, education, homeless) 	<ul style="list-style-type: none"> • Housing need assessment • Homeless needs (chronically homeless, families with children, veterans) • Homelessness strategy • Non-homeless special needs 	<ul style="list-style-type: none"> • Interview

Agency/Group/Organization Name	Type	Section of Plan Addressed	Consultation Method	
14	Lewiston Transit System	<ul style="list-style-type: none"> • Other government (local) • Other – transportation • Regional organization • Planning organization 	<ul style="list-style-type: none"> • Non-homeless special needs • Non-housing community development strategy 	<ul style="list-style-type: none"> • Interview
15	Opportunities Unlimited, Inc.	<ul style="list-style-type: none"> • Services (persons with disabilities, health) • Health agency 	<ul style="list-style-type: none"> • Housing need assessment • Non-homeless special needs • Non-housing community development 	<ul style="list-style-type: none"> • Focus group
16	Quality Behavioral Health	<ul style="list-style-type: none"> • Services (health, victims of domestic violence) • Health agency 	<ul style="list-style-type: none"> • Housing need assessment • Non-homeless special needs • Non-housing community development 	<ul style="list-style-type: none"> • Public meeting
17	ROC Rescue Mission (2 representatives)	<ul style="list-style-type: none"> • Services (homeless) 	<ul style="list-style-type: none"> • Housing need assessment • Homelessness needs (chronically homeless, families with children, veterans, unaccompanied youth) • Homelessness strategy 	<ul style="list-style-type: none"> • Interview • Focus group
18	Twin County United Way	<ul style="list-style-type: none"> • Regional organization • Business leaders • Civic leaders • Other – funder 	<ul style="list-style-type: none"> • Housing need assessment • Non-homeless special needs • Non-housing community development strategy • Anti-poverty strategy 	<ul style="list-style-type: none"> • Interview
19	Valley Christian Center	<ul style="list-style-type: none"> • Housing • Services (children, homeless, employment) 	<ul style="list-style-type: none"> • Housing need assessment • Homelessness needs (chronically homeless, families with children, veterans, unaccompanied youth) • Homelessness strategy • Anti-poverty strategy 	<ul style="list-style-type: none"> • Public meeting
20	YWCA of Lewiston, ID-Clarkston, WA (3 representatives)	<ul style="list-style-type: none"> • Housing • Services (children, elderly people, people with disabilities, victims of domestic violence, homeless) • Regional organization 	<ul style="list-style-type: none"> • Housing need assessment • Homelessness needs (chronically homeless, families with children, veterans, unaccompanied youth) • Homelessness strategy • Non-homeless special needs • Community development strategy 	<ul style="list-style-type: none"> • Interview • Public meeting

OTHER LOCAL/REGIONAL/STATE/FEDERAL PLANNING EFFORTS CONSIDERED WHEN PREPARING THE PLAN

TABLE 3 – OTHER LOCAL / REGIONAL / FEDERAL PLANNING EFFORTS

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Idaho Housing and Finance Association	IHFA’s 2018 Annual Action Plan for Idaho’s Federal Community Development & Affordable Housing Development Programs informs the discussion of public housing in Lewiston’s Strategic Plan.
City of Lewiston Comprehensive Plan 1999, as amended	City Council	The Comprehensive Plan provides background regarding housing and community development in the City.
Pathways to Accelerate North Central Idaho	Clearwater Economic Development District	There are numerous goals from the CEDS that could potentially overlap with and/or reinforce Consolidated Plan activities.
Asset Limited, Income Constrained, Employed (ALICE) Study of Financial Hardship	Twin County United Way	Data regarding ALICE households in Nez Perce County reviewed to inform the housing need assessment.
Fixed Broadband Deployment Database, December 2016	Federal Communications Commission	Data regarding broadband internet availability and speeds reviewed to inform the housing need assessment and market analysis of the Five-year Plan.
Discovery Report for FEMA Region X, August 2016	FEMA and Resilience Action Partners	Data regarding natural hazard risks and mitigation opportunities reviewed to inform the housing need assessment and market analysis in the Five-year Plan.

AP-12 PARTICIPATION 91.105, 91.200(C)

SUMMARY OF CITIZEN PARTICIPATION PROCESS/EFFORTS MADE TO BROADEN CITIZEN PARTICIPATION

SUMMARIZE CITIZEN PARTICIPATION PROCESS AND HOW IT IMPACTED GOAL-SETTING

Information regarding the CDBG program, application for funding, resources and local program contact information are all posted on the City website. Interested parties are encouraged to send an application for funding to the CDBG administrator at the Community Development Department for consideration in the programming of funds for the annual action plan. Likely candidates that come through the Community Development Department are encouraged to meet with the CDBG administrator to determine eligibility of projects. A number of phone calls and in-person visits are received throughout the year by the CDBG

administrator and the City CDBG program requirements are explained. Very few written questions or comments are received.

The community was notified through newspaper advertisements of the availability of funds for the 2019-2020 program year. The advertisement did not indicate the amount, as the allocation for CDBG funds had still not been received. The advertisement provided information on how to get further information, apply for CDBG funds and the deadline to submit an application.

Another advertisement was published notifying the community of the proposed 2019-2020 activities to be programmed, as well as the public hearing date before the City Council, the 30-day comment period, and how to obtain further information and copies of the draft Action Plan. The draft Action Plan was also posted to the city website.

CITIZEN PARTICIPATION OUTREACH

TABLE 4 – CITIZEN PARTICIPATION METHODS

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Comments not accepted and reasons
1	Newspaper ads	Non-targeted/broad community	Advertisement soliciting project proposals.	One application was received for project proposals, while 10+ calls have been received regarding the Community Housing Rehabilitation Program (CHRP). Six applications for CHRP have been submitted.	N/A
2	Newspaper ad	Non-targeted/broad community	Notification of public hearing date, comment period and CDBG allocation amounts for projects	None	N/A
3	City webpages	Non-targeted/broad community	Notices and information regarding CDBG applications and programs.	City webpage: https://cityoflewiston.org Community Development Department webpage: https://www.cityoflewiston.org/content/850/1066/default.aspx	N/A
4	Public hearing	Non-targeted/broad community	2019 Action Plan public hearing		N/A

EXPECTED RESOURCES

AP-15 EXPECTED RESOURCES – 91.220(C) (1, 2)

INTRODUCTION

Due to its size, the City of Lewiston only qualifies for a formula grant under HUD’s CDBG program. The following table shows the City’s CDBG allocation for the 2019-2020 program year (as announced by HUD), along with an estimate of anticipated grant funding for the remaining three program years covered by this Consolidated Plan. This estimate assumes that funding over those three years will average to be about the same as the 2019 allocation.

Lewiston residents are also eligible for housing assistance through the Section 8 Housing Choice Voucher program and Continuum of Care programs operated by the Idaho Housing and Finance Association. However, the City of Lewiston does not receive direct allocations under either program.

ANTICIPATED RESOURCES

TABLE 5 - EXPECTED RESOURCES – PRIORITY TABLE

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$237,429	\$40,000	\$0	\$277,429	\$832,287	Public improvements are anticipated to leverage other local and federal funds. Housing rehabilitation, new construction, and economic development activities will leverage other private and public funds.

EXPLAIN HOW FEDERAL FUNDS WILL LEVERAGE THOSE ADDITIONAL RESOURCES (PRIVATE, STATE AND LOCAL FUNDS), INCLUDING A DESCRIPTION OF HOW MATCHING REQUIREMENTS WILL BE SATISFIED

While CDBG funds do not require a match, the City anticipates leveraging local, federal, and private funds as they address the priorities and goals outlined in the Consolidated Plan. The City will leverage local (i.e., city) funds to complete public improvements in neighborhoods and business districts with low and moderate-income households. Private funds and other federal funds will be leveraged for housing rehabilitation projects.

IF APPROPRIATE, DESCRIBE PUBLICLY OWNED LAND OR PROPERTY LOCATED WITHIN THE JURISDICTION THAT MAY BE USED TO ADDRESS THE NEEDS IDENTIFIED IN THE PLAN

The City does not anticipate using publicly owned land to address the needs identified in the plan. Public improvement activities, such as sidewalk repair or construction, ADA accessibility improvements, etc., may take place on publicly owned property.

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ANNUAL GOALS AND OBJECTIVES

AP-20 ANNUAL GOALS AND OBJECTIVES

Goals Summary Information

TABLE 6 – GOALS SUMMARY

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Preserve and expand affordable housing	2019	2020	Affordable housing Public housing Homeless Non-homeless special needs	N/A	Housing affordability Homelessness	CDBG: \$254,000	Homeowner Housing Rehabilitation: 21 Household Housing units (+/- 12,000 per home).
2	Provide fair housing education and enforcement	2019	2020	Non-housing community development need	N/A	Fair housing education and enforcement	CDBG: \$8,000	Public service activities other than Low/Moderate Income Housing Benefit: 40 Persons Assisted
3	Program administration	2019	2020	Non-housing community development needs	N/A	Program administration and planning	CDBG: \$15,429	Administration and planning

TABLE 7 – GOAL DESCRIPTIONS

#	Goal Name	Goal Description
1	Preserve and Expand Affordable Housing	Assistance with residential rehabilitation for low and moderate-income homeowners.
2	Provide Fair Housing Education and Enforcement	Provide fair housing education and enforcement through fair housing education activities to the general population and vulnerable groups
3	Program Administration	Funding for performance of administrative and planning requirements of the CDBG program.

AP-35 PROJECTS – 91.220(D)

Introduction

Projects identified for the 2019-2020 program year are identified in the table below, with additional detail provided in AP-38. Over the next year, the City of Lewiston anticipates assisting low and moderate-income homeowners with residential rehabilitation, including roof repair and electrical panel upgrades. The City will also provide fair housing education to local residents and program administration.

Any funding that is available or in need of reprogramming, will be put towards residential rehabilitation or other eligible activities that will assist low and moderate-income persons.

Projects

TABLE 8 – PROJECT INFORMATION

#	Project Name
1	CHRP – Community Housing Rehabilitation Program
2	Fair Housing Education
3	2019 Administration

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

With limited CDBG resources, the City of Lewiston strives to administer its funds as efficiently as possible. To assure CDBG activities have maximum impact on community needs while keeping administrative oversight within the City's means, decisions on project awards considered the following:

- Project activities can be implemented by agencies with adequate administrative capabilities;
- Project activities do not generate City administrative responsibilities beyond the capacity of existing staff to provide effective oversight;
- Projects enhance the development and support of community partnerships;
- Projects have high and lasting impact on priority community needs identified in the 5-year Consolidated Plan;
- Projects emphasize "bricks and mortar" whenever possible; and
- Public services projects help individuals or households transition to stability.

In evaluating proposals from potential CDBG subrecipients, when all other application factors are equal, the City gives preference to applicants that can demonstrate the ability to administer grant funds in compliance with program requirements. The City does not anticipate any obstacles to implementing these projects and meeting the underserved needs their scopes propose to address.

AP-38 PROJECT SUMMARY

Project Summary Information

TABLE 9 – PROJECT SUMMARY

1	Project Name	CHRP – Community Housing Rehabilitation Program
	Target Area	N/A
	Goals Supported	Preserve and Expand Affordable Housing
	Needs Addressed	Housing Affordability
	Funding	\$254,000 (\$214,000 + 40,000 expected in program income)
	Description	Assistance with residential rehabilitation for low and moderate income homeowners
	Target Date	7/31/2020
	Estimate the number and type of persons that will benefit from the proposed activity	Approximately 21 or more families are estimated to be assisted with funding. This amount could be more or less depending on the extent of rehabilitation repairs needed and the amount of program income received. This number is based on an estimate of +/- \$12,000 per home.
	Location Description	City of Lewiston
	Planned Activities	<p>The City will provide funding to low and moderate income homeowners for residential rehabilitation projects, such as:</p> <ul style="list-style-type: none"> • Roof repair; • Electrical panel upgrades; • Repairs to heating system, plumbing system hot water heaters and access to the water supply; • Repair or replacement of windows, when glass is missing, broken, cracked, or when the window framing is rotten; • Lead based paint testing;

		<ul style="list-style-type: none"> • Repairs needed to eliminate barriers to accessibility; • Replacement of electrical panels and wiring; <p>Any other repairs eligible under the CDBG program.</p>
2	Project Name	Fair Housing Education
	Target Area	N/A
	Goals Supported	Provide Fair Housing Education and Enforcement
	Needs Addressed	Fair Housing Education and Enforcement
	Funding	\$8,000
	Description	Provide education and outreach regarding fair housing rights
	Target Date	7/31/2020
	Estimate the number and type of persons that will benefit from the proposed activity	40 persons
	Location Description	City of Lewiston
	Planned Activities	The City will provide funding for fair housing education and outreach activities to residents, landlords, health and human service agencies, and others
3	Project Name	2019 Administration
	Target Area	N/A
	Goals Supported	Program Administration
	Needs Addressed	Program Administration and Planning
	Funding	\$15,429
	Description	Program administration and planning

Target Date	7/31/2020
Estimate the number and type of persons that will benefit from the proposed activity	Not applicable.
Location Description	City of Lewiston
Planned Activities	The management and oversight of the CDBG program by the City of Lewiston Community Development Department.
CDBG Total	\$277,429

DRAFT

AP-50 GEOGRAPHIC DISTRIBUTION – 91.220(F)

DESCRIPTION OF THE GEOGRAPHIC AREAS OF THE ENTITLEMENT (INCLUDING AREAS OF LOW-INCOME AND MINORITY CONCENTRATION) WHERE ASSISTANCE WILL BE DIRECTED

The City of Lewiston has not targeted specific areas as part of its strategic use of CDBG funds; however, the City will use funds to benefit low and moderate-income neighborhoods and households over the 2019-2020 program year. Funds will support neighborhood revitalization through rehabilitation of affordable housing for homeowners. CDBG activities will be focused on assisting some of the most vulnerable population, including households with incomes below 50% of the area median income (AMI) and persons with disabilities.

DRAFT

AFFORDABLE HOUSING

AP-55 AFFORDABLE HOUSING – 91.220(G)

INTRODUCTION

Over the 2019-2020 program year, the City of Lewiston estimates that it will assist an estimated 21 non-homeless low and moderate-income homeowner households with the rehabilitation of existing residential units. Such rehabilitation activities may include, but are not limited to, roof repairs and upgrades to outdated electrical panels.

The City of Lewiston is exploring a partnership with the Community Action Partnership on their weatherization plan. The City is also awaiting a response from the Idaho Housing and Finance Association regarding the Housing Choice Voucher process for landlords to create an incentive program for rental rehabilitation.

TABLE 6 - ONE YEAR GOALS FOR AFFORDABLE HOUSING BY SUPPORT REQUIREMENT

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

TABLE 7 - ONE YEAR GOALS FOR AFFORDABLE HOUSING BY SUPPORT TYPE

One Year Goals for the Number of Households Supported Through	
Rental Assistance	
Production of New Units	
Rehab of Existing Units	21
Acquisition of Existing Units	
Total	21

DISCUSSION

Depending on the amount of rehabilitation funding needed per project, the number of households supported may either increase or decrease.

AP-60 PUBLIC HOUSING – 91.220(H)

ACTIONS PLANNED DURING THE NEXT YEAR TO ADDRESS THE NEEDS TO PUBLIC HOUSING

Not applicable. The state PHA does not operate public housing in Lewiston and there is no local PHA.

ACTIONS TO ENCOURAGE PUBLIC HOUSING RESIDENTS TO BECOME MORE INVOLVED IN MANAGEMENT AND PARTICIPATE IN HOMEOWNERSHIP

Not applicable.

IF THE PHA IS DESIGNATED AS TROUBLED, DESCRIBE THE MANNER IN WHICH FINANCIAL ASSISTANCE WILL BE PROVIDED OR OTHER ASSISTANCE

Not applicable. The state PHA is not designated as troubled.

AP-65 HOMELESS AND OTHER SPECIAL NEEDS ACTIVITIES – 91.220(I)

INTRODUCTION

This section identifies actions Lewiston will take over the next year to address homelessness and other special needs.

DESCRIBE THE JURISDICTIONS ONE-YEAR GOALS AND ACTIONS FOR REDUCING AND ENDING HOMELESSNESS INCLUDING:

1. REACHING OUT TO HOMELESS PERSONS (ESPECIALLY UNSHELTERED PERSONS) AND ASSESSING THEIR INDIVIDUAL NEEDS

The City will support efforts by local nonprofit organizations and by the Idaho Housing and Finance Association to provide outreach and case management services to assess individual needs and link them with appropriate services. The City's participation in the local Continuum of Care and past support for projects (such as the Salvation Army's Hygiene Center) that facilitate nonprofit outreach to people who are homeless, help the front-lines service providers accomplish their mission. Local organizations including the Salvation Army and Community Action Partnership will continue outreach to homeless people and families, including unsheltered persons, to assess needs and connect individuals with services. The City of Lewiston does not have specific one-year goals related to these actions, since no application

was received for allocating funds towards these activities during the 2019-2020 program year.

2. ADDRESSING THE EMERGENCY SHELTER AND TRANSITIONAL HOUSING NEEDS OF HOMELESS PERSONS

The City of Lewiston will explore opportunities to collaborate with local nonprofit organizations to expand emergency and transitional housing for homeless persons, including through support of the Balance of State Continuum of Care and its annual application process for new funding. The City will consider supporting the annual application through contributions of knowledge, in-kind resources, letters of support, and other similar actions. While no CDBG funds will be used for emergency or transitional housing this year, discussions with local nonprofit organizations may lead to future allocations to address needs related to emergency or transitional housing.

Emergency shelter providers in Lewiston will continue to operate over the next year, including the YWCA (10 shelter beds for families with children and 12 for victims of domestic violence), Salvation Army (6 beds for families with children), and Family Promise (4 beds for families with children). The City does not have specific goals in terms of number of households to be assisted with emergency housing over the next year, as the City is not providing CDBG funding for these activities.

3. HELPING HOMELESS PERSONS (ESPECIALLY CHRONICALLY HOMELESS INDIVIDUALS AND FAMILIES, FAMILIES WITH CHILDREN, VETERANS AND THEIR FAMILIES, AND UNACCOMPANIED YOUTH) MAKE THE TRANSITION TO PERMANENT HOUSING AND INDEPENDENT LIVING, INCLUDING SHORTENING THE PERIOD OF TIME THAT INDIVIDUALS AND FAMILIES EXPERIENCE HOMELESSNESS, FACILITATING ACCESS FOR HOMELESS INDIVIDUALS AND FAMILIES TO AFFORDABLE HOUSING UNITS, AND PREVENTING INDIVIDUALS AND FAMILIES WHO WERE RECENTLY HOMELESS FROM BECOMING HOMELESS AGAIN

Homeless providers in the community are members of the Idaho Balance of State Continuum of Care and will emphasize rapid re-housing programs as a way to minimize the amount of time a household is homeless.

The City of Lewiston does not plan to allocate CDBG funding toward homelessness or homelessness prevention during the 2019-2020 program year, due to no applications or requests for funding received. Several local agencies will continue to address homeless needs for chronically homeless individuals and families, families with children, veterans, and unaccompanied youth, as described below. Through emergency housing, case management services, referrals to housing providers, and other programs, these agencies assist in shortening the time that clients experience homelessness, facilitating access to affordable housing, and preventing a return to homelessness. In many cases, these programs and resources are not targeted to specific subgroups of the homeless population and may be accessed by chronically homeless persons, families with children, and veterans.

Chronically Homeless Individuals and Families: ROC Rescue Mission has served chronically homeless individuals and families with substance abuse counseling, nutrition and laundry assistance, and case management to assist participants in addressing barriers to housing and self-sufficiency. The ROC

operated a warming shelter for homeless men during cold weather but will be closing its doors in May 2019. Salvation Army will continue to operate a hygiene center available for use by people experiencing chronic homelessness and provide street-level outreach to homeless individuals and families in Lewiston, including those who are unsheltered. The City does not have specific goals in terms of number of chronically homeless individuals and families to be assisted over the next year, as the City is not providing CDBG funding for these activities.

Families with Children: Emergency shelter resources that will continue to operate over the next year include the YWCA (10 shelter beds for families with children and 12 for victims of domestic violence), Salvation Army (6 beds for families with children), and Family Promise (4 beds for families with children). Family Promise's case management services designed to help a family obtain and maintain employment, save money, and eventually move to permanent housing will also continue during 2019-2020. Community connections developed during the stay in Family Promise's transitional housing are designed to support the formerly homeless family once they move to permanent housing and prevent a return to homelessness. The City does not have specific goals in terms of number of homeless families to be assisted over the next year, as the City is not providing CDBG funding for these activities.

Veterans and their Families: Resources dedicated specifically to homeless veterans and their families are very limited in Lewiston. Over the next year, this group can continue to access the programs and shelters described above, although resources are not anticipated to be dedicated specifically to housing, supportive services, and homelessness prevention for veterans. The City does not have specific goals in terms of number of veterans to be assisted over the next year, as the City is not providing CDBG funding for these activities.

Unaccompanied Youth: Idaho Youth Ranch will continue to serve unaccompanied youth throughout Idaho with emergency shelter, residential care, youth and family therapy, job readiness training, and adoption services. Youth Ranch works with youth and their families so that when they are reunited, they are better able to communicate and avoid future issues, thereby shortening periods of homelessness and helping prevent a return to homelessness. The City does not have specific goals in terms of number of unaccompanied youth to be assisted over the next year, as the City is not providing CDBG funding for these activities.

4. HELPING LOW-INCOME INDIVIDUALS AND FAMILIES AVOID BECOMING HOMELESS, ESPECIALLY EXTREMELY LOW-INCOME INDIVIDUALS AND FAMILIES AND THOSE WHO ARE: BEING DISCHARGED FROM PUBLICLY FUNDED INSTITUTIONS AND SYSTEMS OF CARE (SUCH AS HEALTH CARE FACILITIES, MENTAL HEALTH FACILITIES, FOSTER CARE AND OTHER YOUTH FACILITIES, AND CORRECTIONS PROGRAMS AND INSTITUTIONS); OR, RECEIVING ASSISTANCE FROM PUBLIC OR PRIVATE AGENCIES THAT ADDRESS HOUSING, HEALTH, SOCIAL SERVICES, EMPLOYMENT, EDUCATION, OR YOUTH NEEDS

The City of Lewiston does not plan to allocate CDBG funding toward homelessness prevention during the 2019-2020 program year. Local service providers will continue to offer resources to help individuals and

families avoid becoming homeless, including:

- Rental assistance to help extremely low-income households and households receiving assistance from public and private agencies keep their housing and assist with utility and heating bills (when funding is available) through Community Action Partnership (CAP).
- Homelessness prevention for extremely low-income households and households receiving assistance from public and private agencies via utility payments from vulnerable households through the Idaho Housing and Finance Association.
- Case management to gain stability and avoid homelessness for individuals discharged from correctional institutions and/or with criminal histories through Community Action Partnership (CAP). CAP's case management services may include assistance and referrals for housing resources, if needed.
- Community-based services for seniors designed to help older individuals avoid institutionalization and assist those in long-term care return to their communities through CAP. These services include case management, coordination of other community services, in-home health services, shopping assistance, transportation services, and other health and welfare information or referrals.

The City does not have specific goals in terms of number of households to be assisted with homelessness prevention over the next year, as the City is not providing CDBG funding for these activities.

Supportive services for elderly and frail elderly will continue to be provided through CAP over the next year. CAP also provides case management services and referral services for other special needs populations, including people with disabilities (physical, mental, or substance abuse related) and people with HIV/AIDS, and will continue to do so over the next year. Opportunities Unlimited, Inc. will also continue to provide supportive services to people with physical and developmental disabilities. Such services will include evaluation, training, employment, education, and other support services to increase independent functioning, vocational skills, and earned income. The City of Lewiston does not have any public housing units, and thus does not have service providers focused on support services for public housing residents.

The City of Lewiston does not have specific goals in terms of number of people to be assisted with non-housing supportive services over the next year, as the City is not providing CDBG funding for these activities. The City used CDBG funding to construct a bus shelter near Opportunities Unlimited, Inc. during the 2018 program year to facilitate access to the agency for transit-dependent clients.

AP-75 BARRIERS TO AFFORDABLE HOUSING – 91.220(J)

INTRODUCTION

Although comprehensive plans and zoning and land use codes play an important role in regulating the health and safety of the structural environment, overly restrictive codes can negatively impact housing affordability and fair housing choice within a jurisdiction. In preparing the 2018-2022 Analysis of Impediments, a review of the City's zoning code was conducted to identify any potential policies that could have the effect of limiting the development of affordable housing.

While Lewiston's zoning standards are not facially exclusionary when compared to other jurisdictions, the City can continue to encourage infill development in traditionally low-density neighborhoods and higher-density development where appropriate. This would potentially allow for more supply of housing, which helps put downward pressure on rental prices, so that moderate and low-income families have access to those neighborhoods and all the congruent benefits that come with higher opportunity areas such as access to jobs, better schools, access to transportation, and access to cultural amenities and public accommodations.

Other public policy-based solutions that could encourage more affordable housing development are the extensions of infrastructure to the outermost areas of the city, such as the Orchards. Many parts of the Orchards are on well and septic systems, which limit the density of development. Extending municipal water and sewer lines to serve these communities could allow for more development, including denser, multifamily types.

In addition to these public-sector barriers, the private market creates barriers as well. Known as source-of-income discrimination, some landlords will refuse to rent units to households using a Housing Choice Voucher or receiving another form of public assistance. While not a Fair Housing Act violation, this form of discrimination reduces the affordability of existing units in the private housing stock. The poor quality of some rental housing units also makes them unsuitable for occupancy, thus removing further units for the city's rental housing inventory.

ACTIONS IT PLANNED TO REMOVE OR AMELIORATE THE NEGATIVE EFFECTS OF PUBLIC POLICIES THAT SERVE AS BARRIERS TO AFFORDABLE HOUSING SUCH AS LAND USE CONTROLS, TAX POLICIES AFFECTING LAND, ZONING ORDINANCES, BUILDING CODES, FEES AND CHARGES, GROWTH LIMITATIONS, AND POLICIES AFFECTING THE RETURN ON RESIDENTIAL INVESTMENT

Current and ongoing City activities of the Lewiston Community Development Department to promote and encourage affordable housing include:

- Construction of two mile +/- sewer trunk line into the East Orchards o support future development

and eliminate existing and future septic systems that are polluting the groundwater;

- Identifying the expansion of the housing supply as the Departments #1 Strategic Plan Objective, including zoning provisions that will allow accessory dwelling units and duplexes in all single-family residential zones;
- A second objective is to identify underdeveloped properties that are “ripe” for additional development (this objective will take more than one year to complete).

City staff is currently researching the possibility of creating a rental rehabilitation program to incentivize landlords to accept Housing Choice Vouchers or other forms of assistance as a way to improve the quality of rental housing units, as well as remove the source-of-income discrimination barrier.

AP-85 OTHER ACTIONS – 91.220(K)

INTRODUCTION

This section will detail the City’s actions to ensure safe, decent, quality, affordable housing for Lewiston residents.

ACTIONS PLANNED TO ADDRESS OBSTACLES TO MEETING UNDERSERVED NEEDS

The City will work with homeless housing and services providers toward development of an additional homeless facility in the City. The City has identified zoning districts suitable for a shelter and appropriate development standards after intensive community participation. The City funded a hygiene center at the Salvation Army in 2012 using CDBG funds. This facility is accessible by transit and is open for use at least 30 hours per week. Additionally, the City has been supportive of the ROC Rescue Mission's day center serving people who are homeless, although the ROC will be closing its doors May 2019. Both of these facilities open opportunities for unsheltered homeless persons to engage with the local service delivery infrastructure and encourage outreach to this population.

ACTIONS PLANNED TO FOSTER AND MAINTAIN AFFORDABLE HOUSING

The City will help foster affordable housing with the federal resources that have been awarded. The City will use several strategies including:

- Provide funding to support homeowner rehabilitation programs.
- Seek programs and funding to support construction of new affordable housing in Lewiston.
- Working through Code Enforcement to ensure maintenance and preservation of existing housing stock.

ACTIONS PLANNED TO REDUCE LEAD-BASED PAINT HAZARDS

The City will work with local agencies to seek an effective way of managing lead-based paint hazards requirements so that housing rehabilitation activities can be reinstated.

The City will research the possibility of applying for a Lead-Based Paint Hazard Reduction Grant.

ACTIONS PLANNED TO REDUCE THE NUMBER OF POVERTY-LEVEL FAMILIES

As funding is available, the City will promote eligible services through partnerships with local organizations.

ACTIONS PLANNED TO DEVELOP INSTITUTIONAL STRUCTURE

The City will continue to attend meetings of the local homeless coalition and explore ways in which the City can plan for and support additional homeless program resources.

In concert with other potential housing rehabilitation providers in the community, the City will continue to seek methods to meet Lead Based Paint requirements feasibly.

ACTIONS PLANNED TO ENHANCE COORDINATION BETWEEN PUBLIC AND PRIVATE HOUSING AND SOCIAL SERVICE AGENCIES

The City will continue to attend meetings of the local homeless coalition and explore ways in which the City can plan for and support additional homeless program resources.

City staff will continue to explore options with local agencies to work towards solutions to effectively manage lead-based paint requirements so that housing rehabilitation activities become cost-effective.

PROGRAM SPECIFIC REQUIREMENTS

AP-90 PROGRAM SPECIFIC REQUIREMENTS – 91.220(L) (1, 2, 4)

COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM (CDBG)

REFERENCE 24 CFR 91.220(L) (1)

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

TABLE 82 – PROGRAM INCOME

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	0
5. The amount of income from float-funded activities	0
Total Program Income	\$40,000

OTHER CDBG REQUIREMENTS

TABLE 93 – OVERALL BENEFIT

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

The three year period used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income are 2017, 2018 and 2019.