

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 City identified the following goals and objectives to address in its Consolidated Plan. Included below are goals, benchmarks, and progress this year:

1. Support people in their efforts to transition out of poverty. The City expected to serve 714 persons this year and served 171 or 24% of the annual goal.
2. Prevent homelessness. The City expected to prevent homelessness by offering supportive services for 812 persons this year and served 795 or 98% of its annual goal.
3. Improve the safety and efficiency of the housing stock. The City expected to rehabilitate 25 rental units and rehabilitated 35 units 140% of the annual goal. The City expected to rehabilitate 10 homeowner units and rehabilitated 1 unit or 10% of its annual goal. The Code Enforcement Officer inspected 373 properties in the CDBG target area. Of those, 3 units received CDBG funding to correct code violations. 147 properties were cited for violations; 69 were completed and cleared by the owner; and 107 remain in violation. Outside of the CDBG target area, 1 single family low-income homeowner received CDBG funding for minor violations and improvements such as an electrical upgrade and replacing a furnace.
4. Reduce lead hazards in housing. The City made lead safe 72 rental units and added the count to the overall strategic plan goal.
5. Increase neighborhood pride through investment in infrastructure. In FFY 2018, the City did the environmental assessment on 280 Bartlett Street- Soccer Field, which is being constructed using non-CDBG funding and is not yet complete. Construction has been delayed attributable to permit amendments and approval needed from a federal agency on using this site to replace a recreation site that was funded under that program in the 1970s, but that is no longer used for recreation. Engineering work was completed for the renovation of Howe Street sidewalks with construction to occur in 2021. Sophia's House and Tree Street Youth renovations were completed this year. Not funded with CDBG, but nevertheless of benefit to the Tree Street neighborhood were improved Holiday lighting in Kennedy Park and Pop Up Gardens which engage local residents in physically improving and caring for their neighborhood. Those efforts are not included in the official count of the City meeting

just 1.4 % of its annual goal by serving 180 people.

6. Promote jobs and economic growth. The City met 40% of the annual goal by assisting three businesses and creating two jobs at businesses were assisted using CDBG funds. Those businesses were located at 12 Ash Street, 50 Lisbon Street, and 43 Lisbon Street. One job was located at 12 Ash Street and one job was located at 43 Lisbon Street.

7. Create more stable and diverse mixed income neighborhoods. In late 2019the City launched a Rental Registry ordinance and program which maintains a record of housing unit owners, mix of unit types by building, as well as a history of code violations. This was launched as an initiative to improve properties in the downtown. Just as the program was launching COVID 19 descended on the landscape. With revenues to landlords significantly impacted the City Council waived the penalties for not enrolling in the registry, resulting in low participation. In 2021 that effort has been reinvigorated. Significant planning work was done as part of the "Growing our Tree Streets" plan that will result infill development, increased owner occupancy, and the development of 185 new multi-family units including 92 replacement units of HUD assisted units, 38 LIHTC units, and 55 unrestricted 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
Anti-poverty/Lewiston	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5050	6699	132.65%	714	171	23.95%
Fair Housing	Fair Housing and Housing Choice	CDBG: \$	Other	Other	250	186	74.40%	0	0	

Housing Stock	Affordable Housing Green and Healthy Homes Intervention	CDBG: \$ / OHHLHC: \$ / RLF: \$197000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		35	0	0.00%
Housing Stock	Affordable Housing Green and Healthy Homes Intervention	CDBG: \$ / OHHLHC: \$ / RLF: \$197000	Rental units rehabilitated	Household Housing Unit	150	86	57.33%	25	35	140.00%
Housing Stock	Affordable Housing Green and Healthy Homes Intervention	CDBG: \$ / OHHLHC: \$ / RLF: \$197000	Homeowner Housing Rehabilitated	Household Housing Unit	50	61	122.00%	10	1	10.00%
Housing Stock	Affordable Housing Green and Healthy Homes Intervention	CDBG: \$ / OHHLHC: \$ / RLF: \$197000	Housing for Homeless added	Household Housing Unit	0	0		0	0	
Housing Stock	Affordable Housing Green and Healthy Homes Intervention	CDBG: \$ / OHHLHC: \$ / RLF: \$197000	Housing for People with HIV/AIDS added	Household Housing Unit	0	0		0	0	

Housing Stock	Affordable Housing Green and Healthy Homes Intervention	CDBG: \$ / OHHLHC: \$ / RLF: \$197000	Buildings Demolished	Buildings	50	5	10.00%			
Housing Stock	Affordable Housing Green and Healthy Homes Intervention	CDBG: \$ / OHHLHC: \$ / RLF: \$197000	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	150	525	350.00%	50	373	746.00%
Housing Stock	Affordable Housing Green and Healthy Homes Intervention	CDBG: \$ / OHHLHC: \$ / RLF: \$197000	Other	Other	30	7	23.33%			
Increase Neighborhood Pride through Investment	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	15000	78380	522.53%	12950	180	1.39%
Increase Neighborhood Pride through Investment	Non-Housing Community Development	CDBG: \$	Brownfield acres remediated	Acre	8	0	0.00%	8	0	0.00%
Jobs and Economic Growth	Non-Housing Community Development	CDBG: \$ / RLF: \$250000	Facade treatment/business building rehabilitation	Business	10	1	10.00%			

Jobs and Economic Growth	Non-Housing Community Development	CDBG: \$ / RLF: \$250000	Jobs created/retained	Jobs	50	5	10.00%	2	2	100.00%
Jobs and Economic Growth	Non-Housing Community Development	CDBG: \$ / RLF: \$250000	Businesses assisted	Businesses Assisted	15	6	40.00%	3	4	133.33%
Mixed-Income Neighborhoods	Affordable Housing Education tenant and landlord - LEAD	HOUSING RLF: \$	Direct Financial Assistance to Homebuyers	Households Assisted	10	1	10.00%			
Prevent Homelessness	Homeless	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	10000	9568	95.68%	300	0	0.00%
Prevent Homelessness	Homeless	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	0		175	6	3.43%
Prevent Homelessness	Homeless	CDBG: \$	Homelessness Prevention	Persons Assisted	200	795	397.50%	812	795	97.91%
Reduce Lead Hazards in Housing	Affordable Housing Healthy Homes	CDBG: \$ / OHHLHC: \$	Rental units rehabilitated	Household Housing Unit	150	72	48.00%			
Reduce Lead Hazards in Housing	Affordable Housing Healthy Homes	CDBG: \$ / OHHLHC: \$	Other	Other	30	65	216.67%			

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.

Over the term of the 2015-2019 Consolidated Plan period the City exceeded its anti-poverty goal by consistently funding public service agencies. Over the term of the ConPlan the City achieved 132.65% of goal. In this program year we were only at 23.95% of goal, likely a reflection of COVID effectively shutting down agencies for the last 4 months of the program year. The City received a \$5.2 million Lead Hazard Control Grant in 2019 which provides a source of funding to continue to address this critical issue of making housing lead safe, code compliant and healthier. A new program manager was hired to administer the 2019 Lead Grant as the 2017 Lead Grant manager closed out that grant and transitioned into a new role as the City's Rehabilitation Coordinator. Under the new grant, on a per unit basis, \$1,400 of owner match will be required and \$1,150 of CDBG funds will be granted toward lead hazard control work of up to \$18,000. When needed to fully address code enforcement identified deficiencies beyond the scope of the lead work CDBG funds will be loaned to assist owners make their buildings code compliant. This work will be coordinated between the Lead Program Manager, Code Enforcement Officer and Rehabilitation Coordinator, of which the latter two positions are funded with CDBG.

FFY 2019 was a transition year for the City with the retirement of our long time Community Development Program Coordinator, new staff coming on board, other staff shifting roles, and COVID delaying and complicating most activities.

On Public Facilities the city exceeded its 5 year goal but was way off pace in this program year, with only engineering of Howe Street sidewalk improvements occurring. Necessary work, but an activity that on its own does not produce beneficiaries. Construction of the sidewalks will occur in the 2021 construction season as will, construction of the Linear Park (sledding hill!) and the long delayed soccer field at 280 Bartlett Street in the Choice Neighborhood area.

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)

	CDBG
White	458
Black or African American	692
Asian	1
American Indian or American Native	1
Native Hawaiian or Other Pacific Islander	0
Total	1,152
Hispanic	25
Not Hispanic	1,127

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

Narrative

The City's racial and ethnic background is similar to the state as a whole in that 93% of the population is white. In the past decade, nearly 6,000 African immigrants and refugees have resettled into Lewiston. Nearly 60% of those African immigrants and refugees have settled in the downtown CDBG Target area which is why the demographic information shows approximately 62% of the Black or African American were served by the public agencies that work in the target area.

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
CDBG	public - federal	946,012	1,252,094
Other	public - federal	985,518	1,428,522

Table 3 - Resources Made Available

Narrative

The City spent \$2,680,616 in funding this year to meet its annual goals.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Census Tract 201	30	76	Public service activities
Census Tract 202	2	0	
Census Tract 203	30	8	Rental rehabilitation
Census Tract 204	30	8	Rental rehabilitation

Table 4 – Identify the geographic distribution and location of investments

Narrative

Most of the funding was spent in the CDBG target areas, such as the Choice Neighborhood and Neighborhood Revitalization Area, with only 8% spent outside of the target areas on owner occupied rehabilitation projects.

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.

The City counts all funding sources as match or leverage to the CDBG and records the amount in IDIS. The City receives match funds based on the requirements for each program.

Commercial Loans/Grants: The City requires a 1:1 private match on all commercial development programs, with the exception of the microenterprise which requires a 1:3 match. The match is collected from the owner at the time that each invoice is paid, with the owner paying half of the invoice and the City paying the other half through its loan program. Often, the total investment in a commercial project far exceeds the match required.

Residential Loans/Grants: Investor-owned 1-4 unit properties and homeowners with incomes between greater than 80% of Median Family Income (MFI) are required to provide a 10% match. For loans to homeowners at 65% MFI-80% MFI, no match is required and homeowners are given a 1/2 deferred loan at 0% interest and a 1/2 amortized loan at 1% interest. For loans to homeowners below 65% MFI, no match is required and homeowners are given a deferred loan at 0% interest. On these loans, the City attempts to maximize its CDBG resources to leverage funding sources from local partners to make improvements through weatherization, lead, and green and healthy homes.

Public Services/Infrastructure Improvements: Public Service Agencies are required to leverage CDBG funds by providing funding from other federal, local, state, or private sources.

Lead Program: The City has a \$5.2 million lead grant that will be used to make 280 housing units lead safe. For multi-families of 1 -8 rental units each unit with an income eligible HH is eligible for up to \$18,000 for lead hazard control work. The owner is required to provide a \$1,400 per unit match and the CDBG program will provide \$1,150. For buildings with more than 9 units the owner match requirement is \$1,550 per unit with no CDBG match. Properties are also eligible for CDBG rehabilitation loan funding. Income qualified single family homeowners do not need to provide an owner match. The CDBG program will provide a \$3000 grant and up to \$18,000 will come from the lead grant.

Public and Private Properties # used to further the Plan: As part of the Choice Planning and Action Grant planning effort, working toward applying for a Choice Implementation Grant, the City donated 111 and 114 Bartlett Street, 91 Pine Street and 320 Bates Street to development

to LAAHDC, a development subsidiary of the Lewiston Housing Authority (LHA), as part of the land assemblage needed for development of 74 units of mixed income housing as part of the plan. In February 2020 the City entered into an Option Agreement with the LHA to convey the former Martel School for development of a LIHTC senior housing project. In June 202 the City entered into an Option Agreement with Raise Op Housing Cooperative to convey 186 Blake at below the City's cost of acquisition in order to support development of a 9 unit cooperative housing project. LAAHDC has acquired numerous other properties in the Choice Neighborhood area. Many of the properties were derelict and vacant. The city used CDBG funds and other resources to assist with demolition. The sites will be used to build high quality affordable replacement housing.

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	11	6
Number of Non-Homeless households to be provided affordable housing units	0	0
Number of Special-Needs households to be provided affordable housing units	0	0
Total	11	6

Table 5 – 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	0	0
Number of households supported through Rehab of Existing Units	35	36
Number of households supported through Acquisition of Existing Units	0	0
Total	35	36

Table 6 – Number of Households Supported

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

The City rehabilitated 35 rental units and 1 homeowner unit to address code violations. The City met 57% of its 5-year rental rehabilitation Con Plan goal by completing 86 rental units. A rehabilitation coordinator position has been created and is expected to be filled during FFY 2020. Construction to renovate a convent into 11 units of combined homeless and affordable housing was completed this year.

Discuss how these outcomes will impact future annual action plans.

This is the last year of the 5-year Con Plan.

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	9	0
Low-income	16	0
Moderate-income	8	0
Total	33	0

Table 7 – Number of Households Served

Narrative Information

Many of the households served were at or below 80% of MFI. Three units were non-low moderate income, but met the rehabilitation program guidelines.

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

In Lewiston's Consolidated Plan, preventing homelessness is a high priority goal. There are over 7,800 people living in poverty in Lewiston. Many are on the brink of crisis. A survey of low income Maine people in 2015 found that at one point in the prior year 46% couldn't pay their utility bill; 39% couldn't pay the full monthly rent; 36% experienced having a car break down with no money to fix it; and 25% were forced to move because they couldn't afford their housing. Given this reality, preventing homelessness requires more than additional shelter beds. It requires help for people to identify needs, alleviate barriers, and connect with jobs, as is described in the recommendations with regard to poverty above. Most importantly, it requires helping homeless individuals and families to find new permanent housing. Without a stable address, it is impossible for people to get to work regularly, to stay healthy, or to plan for the future. The City of Lewiston is an active member of a collaboration of 20+ homeless service providers known as the Lewiston Auburn Alliance for Services to the Homeless (LAASH). LAASH meets monthly to communicate needs and services being provided and coordinate services to the greatest extent possible to address the needs of homeless and near homeless persons in Lewiston-Auburn. LAASH sets annual priorities and goals to address identified gaps in service delivery. LAASH facilitates the Point in Time Survey for the Lewiston-Auburn area. The link to Maine's Continuum of Care (CoC) is:

<https://www.mainehousing.org/partners/partner-type/homeless-service-providers/homeless-initiatives>

Addressing the emergency shelter and transitional housing needs of homeless persons

On June 5, 2019, LAASH and the State of Maine CoC hosted a Conversation about Homelessness at Lewiston City hall to address the recent increase in homeless individuals in Lewiston. 37 persons attended, including staff from our congressional delegation, providers, homeless persons, citizens, housing authority representatives, and City representatives to discuss issues, resources, barriers and recommendations. There were three recommendations: 1) People need to be safe and secure in housing that is affordable to them; 2) Once housed, provide supportive or case management services to help the person housed stay in their home; and 3) Establish a communication hub where good up to date information can be given to homeless people. Information could be distributed through Trinity Jubilee Center, The Club House, or the Lewiston Public Library. The City will include many of these strategies in the next Con Plan. This year the historic renovation of Sophia's House, a former convent, into a combined transitional shelter and affordable housing option was completed and put into service. Sophia's House provides 2 year shared living arrangement for 6 women who have recently left and are healing from prison, trafficking or exploitation, prostitution, drug addiction, in a supportive

atmosphere. The six women live in SRO's on the 3rd floor. They share the house, meals and common spaces with 5 women on the second floor who are in permanent apartments, living on fixed incomes, who serve as mentors. Sophia's House provides supportive services, and purposeful work in a cottage industry based out of the house. CDBG funds were used to assist with redevelopment of the building and with programs.

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

The State of Maine has launched a new initiative with their Shelter Plus Care vouchers for long-term stayers. If a person is homeless 180 out of the previous 365 days, they will go to the top of the list to receive a voucher. The State of Maine will utilize the Homeless Management Information System (HMIS) system to identify at-risk people. A large challenge for Lewiston's chronically homeless is the lack of shelters that allow individuals to remain in the shelter more than 60 days. Two new faith-based shelters have recently been added; however, they do not count the Homeless that seek shelter in these facilities in the HMIS data system. LAASH improves access to services and housing for persons who are homeless or at risk, shares information and strengthens cooperation among local agencies and homeless providers, identifies gaps in services, increases public awareness about homeless issues, and seeks funding to service the homeless and at-risk. The Lewiston Auburn 10 Year Plan to End Homelessness identified difficulty locating assistance and navigating services (including for health, mental health, employment, and housing) as a problem for homeless persons, particularly for families and domestic violence survivors. Homeless service providers describe the challenge of keeping people housed and the need for case management to help with jobs, budgets and basic needs. For persons without a mental health or disability diagnosis, supportive services can be difficult to access unless there is a crisis. This year, the City funded 6 programs through its CDBG public services, who provided support services to 795 households who are homeless or near homeless. Sophia's House, described in the section above, addresses many of these issues.

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

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

Actions taken to address the needs of public housing

The City and Lewiston Housing Authority (LHA) work collaboratively to further fair housing initiatives and have a MOU to provide financial assistance for security deposits under the HME program. Additionally, LHA is a collaborating partner on the L-A Lead Program and Choice Neighborhood. They make referrals to owners of properties that have Section 8 tenant vouchers to enroll their property in the LEAD program. LHA works independently and does not require City assistance to further its goals. LHA has its own initiatives to address the needs of public housing residents, such as collaborating with Lewiston Schools and Lewiston Adult Education to bring educational services to its residents in an effort to open doors of opportunities to which they may not have otherwise had access.

In 2019 the Lewiston Housing Authority hired a new executive director with a strong affordable housing development background. In his short time in the role he has worked closely with City staff to move development opportunities forward. He identified parking and green space on LHA's Blake Street Towers parcel as a site where more housing could be developed. That discussion led to the City rezoning that parcel and several adjacent blocks to Centreville zoning which allows much higher residential density. The rezoning also changed space and bulk standards that resulted in several nonconforming buildings with old, poorly maintained housing stock becoming conforming, increasing their attractiveness for new investment or redevelopment. LHA is the lead applicant on the CHOICE Neighborhood Implementation Grant with the City as co-applicant. LHA is taking the lead on the housing section of the plan. The Blake Street Tower site that was rezoned is housing site development #3 in the Choice Plan, with 40 mixed income, one, two and three bedroom apartments in two elevator serviced, 2 story townhome buildings.

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

Lewiston Housing Authority convenes a Resident Advisory Board to provide input for its Annual Plan. LHA encourages and provides financial support for residents to organize resident council and encourages homeownership through its Family Self-Sufficiency and Voucher Homeownership programs. The City provides rehabilitation funding through CDBG and HOME programs to support homeowners in homeownership and offers homebuyer assistance to pay for down payment or closing cost assistance.

Actions taken to provide assistance to troubled PHAs

Lewiston Housing Authority is a top performer under the rating system.

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 Planning Board and City Council thoughtfully consider rezoning proposals and are actively taking steps to amend zoning to allow higher density development in the CDBG Target Area and NRSA when warranted. Blake Street Towers and several adjacent blocks were rezoned resulting in the density requirement being reduced from a minimum of 1,250 s.f. of lot area per dwelling unit to no minimum lot size requirements. The rezoning also resulted in 22 buildings and 33 parcels becoming conforming that were non-conforming. This will make those parcels more attractive for new investment or redevelopment.

In August 2020 the City approved Design Standards, targeted to the Tree Street Neighborhood to promote quality development that create incentives and flexibility that supports infill development, increase landscaping and street scape requirements, and streamline the development review process.

In late 2019 the City created a Rental Registry Ordinance to improve properties in the downtown. Just as the program was launching COVID 19 descended on the landscape. With revenues to landlords significantly impacted the City Council waived the penalties for not enrolling in the registry, resulting in low participation. In 2021 that effort has been reinigorated.

The City has a long history of partnering with the private sector to develop LIHTC projects, providing tax increment financing, and when warranted, HOME funds. The City Council authorized the City to be a co-applicant on a Choice Neighborhood Implementation Grant, with the Lewiston Housing Authority (LHA) being the lead applicant. This is the culmination of several years of effort to work with citizens to develop a plan, "Growing our Tree Streets," that reflect the vision and desires of residents. Avesta Housing Development was chosen as the housing development partner to work in concert with LHA. The City is a co-applicant on the grant, and lead on the Neighborhood portion of the plan. Community Concepts is lead on the People part of the plan. The plan may be viewed at <https://www.growingourtrestreets.com/>

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

With staff changes in the CD department the City's rehabilitation program began to ramp up, with Code enforcement and CD Rehab staff providing technical assistance and funding to help property owners improve their properties and become code compliant. In 2019 the City was awarded a \$5.2 million lead hazard control grant which is more fully described in the following section.

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

The lead program provides up to \$18,000 per dwelling unit to make properties lead safe. That program is matched with a CDBG funded grant of \$1,150 per unit toward the lead hazard control work, with additional CDBG funded loans for qualified applicants. Owners are required to prove a \$1,400 per unit match.

During FFY 2019, the City continued implementing its 4th LEAD grant and, as of June 30, 2020, the City has performed lead hazard control interventions in 72 units; performed lead risk assessments/lead paint inspections to identify hazards in 119 units; performed healthy homes interventions in 65 units; educated 2,695 about the dangers of lead paint; and trained 42 persons in lead safe practices. CDBG funded lead hazard interventions in 6 units in the target area.

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

The City is focusing its efforts on an anti-poverty strategy that reduces intergenerational poverty. In FFY 2019, the City funded 6 public agencies, benefitting 795 households by providing: subsidized childcare to enable families to work; classes and training skills to improve housing stability; soft skills employment training; and classroom tutoring and academic activities for youth that boost proficiency in the academic skills such as basic math, reading, and writing. Skills attained through these services are designed to break the cycle of intergenerational poverty.

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

During FFY 2019, the City added two additional staff member to the Economic and Community Development Department (ECDD): 1 full time Rehabilitation Coordinator and 1 full time Intake Coordinator. Other members of the Department include a full time Director; 1 full time Economic Development Manager; 1 full time Economic Development Specialist; 1 full time Grants Accountant; 1 full time Community Development Coordinator; 1 full time Lead Program Manager; 1 part time Administrative Assistant; and 1 full time Code Enforcement Officer. The staff skill sets compliment each other which allows for a thoughtful and thorough response to Lewiston's economic and community development needs. The ECDD is housed within the City so staff is able to seek support from other City departments who are always willing to help. City staff is strongly encouraged to attend training to improve knowledge.

Adding a Rehabilitation Coordinator and Intake Coordinator to the Department will negate the need to contract several key functions out to a third party. We anticipate ramping up both the rehab and lead programs once those positions have been filled.

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

The City has been able to maintain strong collaborative partnerships that bring additional resources to further community goals. The City works well with Lewiston Housing Authority, Community Concepts,

Inc., Coastal Enterprises, Inc., and several LIHTC developers and private landlords to address Lewiston's housing needs. The GHHI partnership includes both hospitals, the City of Auburn, Healthy Androscoggin, and private nonprofits to meet the needs of the residents in the CDBG target area. The City is involved in LAASH and works closely with homeless providers. The City has built a network of providers that work collaboratively to accomplish goals. The City has nurtured relationships with several affordable/mixed income housing developers as well as with the Maine State Housing Authority. In the scoring structure, Maine's LIHTC Qualified Allocation Plan Lewiston is one of the preferred communities for housing.

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 2020 -2024 Analysis of Fair Housing Impediments identified the following issues: 1) zoning codes that restrict development, 2) lack of smaller housing options for singles and seniors, 3) barriers to safe housing for renters with prior records of substance abused, sex offender, prison time, chronic homelessness or mental health concerns, 4) unhealthy/unsafe housing stock, 5) lack of Sharia compliant financing, 6) shortage of ADA accessible units, 7) shortage of units suitable for large families, 8) few owner occupancy options in multi-family neighborhoods.

The Choice Neighborhood planning initiative identified many of these issues and recommended that home ownership opportunities be created as part of the infill development strategy. All of the replacement housing recommended in the plan included the creation of ADA compliant units in elevator service buildings when multi-family. The plan calls for the Tree Streets area to be "lead free by '43", and that new housing be energy efficient and built to Passive House standards.

The availability of Sharia compliant financing remains elusive, but the City and local lending partners continue to develop a product that meets federal banking regulations but that also does not charge interest. The City as well as CEI have been able to provide interest free loans with service charges on commercial properties, but have not yet been able to do so for residential mortgage financing. However, the effort continues.

Raise Op Cooperative Housing has renovated a total of 15 units in 3 buildings that employ the cooperative model, where members of the cooperative have ownership and management control of their buildings, bringing home ownership to low and moderate income people, albeit in a non-traditional way. Raise-OP has secured land and begun the design and financing process to develop 9 units of cooperative housing by new construction. The City has partnered in that effort, selling land at below the city's cost of ownership and considering providing HOME funds.

Sophia's House was established in 2019 and provides no cost housing and support services to women coming out of prison, addiction, prostitution, or trafficking. The CDBG program helped fund the renovations and continues to support programming.

As noted elsewhere in this CAPER zoning in Lewiston is a work in progress and evolving. Over the last

year several areas of the downtown were rezoned to allow increased density and make non-conforming uses conforming. This has already resulted in a 35 unit mixed income LIHTC project being developed at the corner of Blake and Pine by Avesta Housing. Under the Choice Plan, and with LHA and Avesta Housing as partners, more is on the way.

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

The Director, Community Development Coordinator and the Grants Accountant monitor the activities funded under the Consolidated Plan and the Annual Action Plan as follows:

- Contractual Agreements are executed between the City and Subrecipients that includes the applicable HUD regulations and addresses requirements of reporting, performance measures, documentation to support the request to be funded, agreement that the City can access and monitor files and the requirement to meet all applicable federal, state, and local regulations.
- Training sessions are held with all subrecipients on the requirements of the program, frequency of reporting, outcome measures, etc.
- A desk audit is performed by the Grants Accountant at each draw and the Administrative Assistant ensures that the reporting is completed quarterly and that the reporting is complete with number of participants served and that race & ethnicity data is provided.
- The Administrative Assistant insures annual compliance with affordability, insurance, and continued residency or other requirements as required with city loan and grant recipients.
- In April all files are reviewed to ensure compliance and that the reporting reflects the goals and objectives they identified during the application process.
- Run periodic performance reports in IDIS to monitor funded activities to the AAP
- City staff make on site visits every 3 years for grantees receiving public services grants and City staff perform a desk audit when the sub-recipient submits its quarterly report and drawdown request to ensure compliance with CDBG rules and that the sub-recipient is meeting its stated goals.

For CDBG activities conducted with other City Departments, a Memorandum of Understanding is completed with information about the expected roles and responsibilities of the department written out.

City staff follow a City adopted procurement policy that identifies the cross cutting regulations, minority business outreach, etc. CDBG staff are notified when services are being procured for a project to ensure that the appropriate language is included in the bid package. The City maintains a log of names and addresses of contact persons in our Ethnic-based Community Organizations and state registered Women, Disabled -and Minority Business Enterprises to make sure that they are included in the notifications from the City.

Program policies are reviewed on a consistent basis to ensure they are compliant with current CDBG rules.

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.

Each year the City places a notice that the CAPER is available and ready for review and provides a 15 day comment period; the notice is published to the City's various social media accounts; the DRAFT CAPER is placed on the City's website; and a copy is provided to each member of the Citizen's Advisory Committee.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

As the 2015 -2019 Consolidated Plan term draws to a close the City has been redoubling its efforts to engage low/moderate residents to envision the neighborhood they want to live in - what kind of housing, what kind of physical lanscape, what kinds of opportunities? The City's programs and funding priorities will reflect the priorities referenced in the Choice "Growing our Tree Streets" plan. The impacts of COVID have also shaped the City's programs, with grant programs added to our loan programs. The eligible uses of those programs broadened from simply brick and mortar improvements, to include technical assistance, working capital, childcare/transportation support for entrepreneurs.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

CR-45 - CDBG 91.520(c)

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