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# 2013 CAPER

SUBMITTED FEBRUARY 12, 2015

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## CR-05 GOALS AND OUTCOMES

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

The City of Lewiston's 2013 CDBG Action Plan submitted in August of 2013 initially programmed the \$276,143 (\$216,143 Annual Allocation plus \$60,000 Program Income) in 2013 grant funds for the following:

- \$ 266,143      ADA Access Ramp and Sidewalk Projects
- \$    5,000      Neighborhood Transit Shelters
- \$    5,000      2013 Admin

The ADA Access Ramp and Sidewalk Projects, along with the Neighborhood Transit Shelters, address the City's need for improved public facilities and infrastructure emphasized in the 2013-2017 Consolidated Plan. By constructing new sidewalks and curbs, the ADA Access Ramp and Sidewalk Projects will improve mobility and accessibility to the 5,367 disabled persons living in the City. The construction of Neighborhood Transit Shelters will also improve accessibility to public transportation for households in primarily low and moderate income neighborhoods.

The SNAP #45 Multi-Unit Residential Rehabilitation was carried over from the 2012 CDBG program year and was completed January 6, 2014. The Burrell Street Station apartments had issues with its fire alarm system, which caused health and safety issues for residents. With a new fire alarm system, frequent false alarms and noise disturbances were eliminated. The new fire alarm system also eliminated the frequency of false alarms to the City of Lewiston Fire Department, thus allowing the Fire Department to be available for more critical and essential services needed within the community of Lewiston.

The Salvation Army Hygiene Center activity, which assists the Salvation Army in providing needed bathing and clothing laundering resources to homeless and low-income families and individuals, was carried over from the 2012 CDBG program year and was completed in September 2014; data will be included in the 2014 CAPER.

CDBG funds expended towards administrative reimbursement activities during the 2013 program year were for advertisements and notices for hearings, and availability of documents to review, as well as updating the Consolidated Plan and Analysis of Impediments to Fair Housing.



**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)**

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Improve public facilities and infrastructure	Non-Housing Community Development	CDBG: \$276143	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	5367	1789	33.33%	5367	1789	33.33%
Improve public facilities and infrastructure	Non-Housing Community Development	CDBG: \$276143	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	700	43	6.14%	388	0	0.00%
Preserve and expand affordable housing	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development Fair housing	CDBG: \$	Rental units rehabilitated	Household Housing Unit	5	5	100.00%		0	
Preserve and expand affordable housing	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development Fair housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	25	0	0.00%		0	
Preserve and expand affordable housing	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development Fair housing	CDBG: \$	Housing for Homeless added	Household Housing Unit	1	0	0.00%		0	
Preserve and expand affordable housing	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development Fair housing	CDBG: \$	Other	Other	1	0	0.00%		0	
Provide services and economic opportunities	Homeless Non-Homeless Special Needs	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	25	0	0.00%		0	
Provide services and economic opportunities	Homeless Non-Homeless Special Needs	CDBG: \$	Homelessness Prevention	Persons Assisted	25	0	0.00%		0	

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

**Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.**

The City of Lewiston's 2013-2017 Consolidated Plan noted that the highest priority activities are

- Affordable Housing;
- Non-Housing Community Development;
- Homelessness; and
- Public Services and Economic Opportunity

The City continued to proactively and systematically seek to rezone lands for affordable housing development, and has sought developers to construct affordable housing. An example of this would be the Canyon View Suites, a 120 unit multi-family housing complex that will improve the housing situation in the jurisdiction by increasing the supply of affordable rental units, as well as meeting accessibility requirements for disabled persons. The project is located in a low density single family residential zoning district and was approved by the Lewiston Planning and Zoning Commission, as well as the Lewiston City Council. The project met a lot of opposition from residents in the area and is still pending legal action. The City continues to support the building of the apartments due to the fact that it will meet the jurisdictions need for more affordable housing. To date the project is nearing the completion of the second and third phase, while the first phase of 48 units has been completed.

The City's use of funds to complete the Salvation Hygiene Center at the end of the 2013 program year focused on helping to prevent homelessness. The Salvation Army Center was delayed due to contractor delays, organization issues, and staff shortages. The Hygiene Center, which was completed September 26, 2014, will serve the homeless and low income individuals and families, and has two shower rooms, two heavy duty industrial washing machines, three dryers, and a table for folding laundry. The Salvation Army Hygiene Center data will be included in the 2014 CAPER, and has helped the City address the priority of homelessness identified in the plan.

Projects that address the priority of public services and economic opportunity, as well as the goal to improve public facility and infrastructure include the ADA Ramps and Sidewalks Accessibility project and the Neighborhood Transit Shelters project. The ADA Ramps and Sidewalks Accessibility project is 90% complete from 10th Street to 17th Street, but has been put on hold for the winter weather. The project is expected to be completed in the spring. The goal and activities in the 2013-2014 Action Plan year included making improvements to increase accessibility for persons with disabilities and will help improve residential and commercial neighborhood safety and livability.

The current public transportation system has limited transit shelters serving the population which presents an obstacle to meeting the underserved needs. Currently persons living in low and moderate income neighborhoods, seniors and disabled person must stand unprotected in inclement weather waiting for public transportation. The Neighborhood Transit shelters project was designed to help overcome these obstacles, but has fallen behind due to a delay in the FTA Environmental review, as well as searching for the best possible place to locate a shelter. The City is working on a remediation plan due to this project being at risk in order to get the project back on track.



### 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	286
Black or African American	3
Asian	12
American Indian or American Native	34
Native Hawaiian or Other Pacific Islander	3
<b>Total</b>	<b>338</b>
Hispanic	22
Not Hispanic	0

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

#### Narrative

CDBG funds were used to replace the fire alarm system for the Burrell Street Station Apartments, a 40 unit LMI/disabled apartment complex. The families assisted were as follows:

- 37 White
- 1 Asian
- 1 American Indian/Alaskan Native
- 1 Asian & White (included with Asian)

Reporting information for the LCSC Adult Learning Center was as follows:

- 249 White
- 3 Black/African American
- 10 Asian
- 33 American Indian/American Native
- 3 Native Hawaiian/Other Pacific Islander
- 22 Hispanic/Latino

Data has not been received for the Salvation Army Hygiene Center, ADA Ramps and Sidewalks, and Neighborhood Transit Shelters. This data will be entered as soon as it has been received and projects completed.





**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		1,100,000	84,210

**Table 3 – Resources Made Available**

**Narrative**

The actual amount expended was distributed as follows:

- \$2,707 2013 Admin
- \$81,503 ADA Access Ramps and Sidewalks Project

Funds committed but not spent during the 2013 program year are as follows:

- \$5,000 programmed and committed for Neighborhood Transit Shelters.
- \$268,880 programmed and remaining for ADA Access Ramps and Sidewalk Projects

The City of Lewiston will expend more funds to the ADA Access Ramps and Sidewalks project during the 2014 program year. The ADA Access project is still in progress and is expected to draw down more funds. The Neighborhood Transit Shelters fell behind schedule, but is expected to draw down on funds during the 2014 program year.

The City did not receive resources from Section 8, LIHTC, or competitive McKinney-Vento funds in large part due to major cutbacks in those federally-assisted programs.

**Identify the geographic distribution and location of investments**

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description

**Table 4 – Identify the geographic distribution and location of investments**

**Narrative**

Even though IDIS does not allow us to input this information, the projects for the 2013 program year were located as follows:

- ADA Sidewalk Improvements – Located on 18th Avenue (10th Street to 17th Street has been completed) Lewiston ID 83501
- Salvation Army Hygiene Center- Located at 1220 21st Street, Lewiston ID
- SNAP #45 Multi-Unit Residential Rehab is Located at 1124 Burrell Avenue Lewiston, ID 83501

**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.

CDBG funds do not require a match but, during the 2013 program year, the City leveraged funds for street/sidewalk improvements, expected to be completed during the 2014 program year, in neighborhoods and business districts serving low and moderate income households. The City also used publically-owned property for the construction of new sidewalks. City Transit funds have been leveraged for expansion of public transportation services serving low and moderate persons and



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disabled persons. While the Neighborhood Transit Shelters was delayed, the project is expected to be completed during the 2014 program year.

Public and private resources that were leveraged during the 2013 program year include the SNAP #45 Multi-Unit Residential Rehabilitation, and the Salvation Army Hygiene Center, with the Salvation Army contributing about \$20,000. Other public and private resources that will be leveraged by CDBG funds programmed for 2013 activities delayed to program year 2014 and will be reported in the 2014 CAPER.

The City actively seeks out partnerships with housing and social service providers to utilize a variety of Federal, State and local funding sources to meet the needs identified in the consolidated plan. The City has actively supported low income housing tax credit projects sponsored by private developers. The CDBG funds used in these projects help leverage significant private investment by other community members, resulting in quality housing being built and creating a lasting asset for the property owner and community.

## CR-20 – AFFORDABLE HOUSING 91.520(B)

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

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

**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	0	43
Number of households supported through Acquisition of Existing Units	0	0
Total	0	43

**Table 6 - Number of Households Supported**

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

Although the City of Lewiston did not anticipate any affordable housing projects in the 2013 Action Plan, the SNAP #45 Rehabilitation Project was carried over from the 2012 program year and has since been completed. New affordable housing units were created by Noel Blum as a result of ten new buildings. The Hillcrest Suites development was set up in three different phases: phase I created 48 units, phase II will create 48 more units, and phase III will create 24 units. Phase I has been completed and phases II and III are expected to be completed in the spring.

### Discuss how these outcomes will impact future annual action plans.

The major goal of the 2013 program year was to focus on public improvement and infrastructure strategies of the Five-year strategic plan; therefore, the City did not anticipate any affordable housing projects, but began planning for year 2 and year 3 activities which would focus on households below 50% AMI.



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 Persons Served	CDBG Actual	HOME Actual
Extremely Low-income	27	0
Low-income	9	0
Moderate-income	3	0
Total	39	0

Table 7 – Number of Persons Served

**Narrative Information**

The SNAP #45 Multi-Unit Residential Rehabilitation was carried over from the 2012 CDBG program year and was completed during the 2013 program year. The apartments received a new fire alarm system, which eliminated the frequency of false alarms to the City of Lewiston Fire Department, thus allowing the Fire Department to be available for more critical and essential services needed within the community. Forty three total residents were benefitted, of which 35 are disabled, 27 are extreme low income, 9 are low income, and 3 are moderate income.

The City of Lewiston does not receive HOME funds. No housing activities were anticipated in the 2013 Action Plan, but the City sought developers, such as Noel Blum and Thomas Mannschreck, to construct affordable housing. Noel Blum recently finished the first phase of his three phase affordable housing complex, and Thomas Mannschreck is in the process of locating land to build senior housing on.

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## **CR-25 – HOMELESS AND OTHER SPECIAL NEEDS**

### **9 I.220(D,E);9 I.320(D,E);9 I.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**

The City of Lewiston used CDBG funds to complete the Salvation Army Hygiene Center. The Hygiene Center assists the Salvation Army in providing needed bathing and clothing laundering resources to homeless and low-income families and individuals. The Hygiene Center provides homeless, transients, and low income residents with a place to launder clothing and bathe thus helping the homeless overcome cleanliness obstacles on their way to gaining employment and creating a suitable living environment. This activity was carried over from the 2012 program year and was completed at the end of the 2013 year; data will be included in the 2014 CAPER.

**Addressing the emergency shelter and transitional housing needs of homeless persons**

The State Emergency Grant Program provided homelessness prevention funding in cases where a family was in imminent danger of becoming homeless and provided rapid re-housing where families are already homeless.

**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**

To improve successful transitions from transitional housing to permanent housing in 2013, IHFA provided training on May 12, 2014 for project sponsors to encourage them to develop concrete permanent housing strategies for people exiting transitional housing programs. The City does not own or fund any homeless shelters, transitional housing, or public housing itself but relies on other organizations to provide these services. The City looks for opportunities to assist these organizations—such as the YWCA, Family Promise, New Bridges Community Church, and the Salvation Army—who do provide housing and services for the homeless and low-income individuals and families.

**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**

On March 20, 2014 the IHFA received a \$97,000 grant from the National Foreclosure Mitigation Counseling Program that supported its efforts to provide counseling to Idaho homeowners in danger of foreclosure. IHFA has provided more than 11,500 Idahoans with foreclosure prevention counseling in the past five years, thus helping individuals and families avoid becoming homeless.

The City of Lewiston continues to participate in a Continuum of Care through an already well-established relationship with community-based housing and social service groups in the city to utilize a limited amount of Federal, State and local funding sources to meet the needs identified in the Consolidated Plan.

As described in the YWCA's 2014 Resource Guide, the following organizations provided services to the homeless (organizations which provide housing services to homeless Lewiston residents are designated with \*) and special needs persons who required supportive housing:



- Area Agency on Aging and Adult Services;
- Community Action Partnership;
- Community Action Partnership, Food Bank;
- City of Lewiston, Senior Nutrition;
- Department of Health and Welfare, Idaho Mental Health;
- Disability Action Center Northwest, Inc.;
- Family Promise of Lewis-Clark Valley\*;
- Goodwill Working Solutions;
- Habitat for Humanity, Lewiston-Clarkston Partners;
- Idaho Housing and Finance Association\*;
- Idaho Legal Aid Services;
- New Bridges Community Church\*;
- St. Vincent de Paul;
- Salvation Army\*;
- Snake River Community Clinic;
- Valley Meals on Wheels;
- YWCA of Lewiston, ID-Clarkston, WA\*;

Although the City does not provide direct services to the homeless or special needs, it assists some of the above organizations in doing so. For example, the City employs the two Senior Nutrition staff who prepares the meals as well as providing the location for preparing and serving meals for Senior Nutrition and Valley Meals on Wheels. The City also recently spent CDBG funds for construction of a hygiene center at the Salvation Army. Provision of CDBG funding for capital improvements allows organizations such as the YWCA and the Salvation Army to use their limited funds on programs and services for the homeless and LMI persons.



## **CR-30 – PUBLIC HOUSING 91.220(H);91.320(J)**

### **Actions taken to address the needs of public housing**

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

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

Not applicable.

### **Actions taken to provide assistance to troubled PHAs**

Not applicable.



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## 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 City encourages mixed-use commercial and residential development and focuses on fostering an environment conducive to private development by increasing the downtown density to provide a platform for increased amenities, services, employment and ease of access. The City has also taken steps to remove delays in permitting and ordinance approvals that were potential barriers to affordable housing and has enacted time limits on the planning and zoning process.

The Lewiston Community Development Department proactively and systematically sought to rezone lands for affordable housing development, sought developers to construct affordable housing and facilitate and support of applications related to rezoning and construction for affordable housing. One of the local developers in the City of Lewiston, Noel Blum, is in the process of constructing an affordable housing apartment complex consisting of 120 units. The first phase of constructing 48 units has been completed and they are in the process of constructing the second phase of 48 units. The second and third phase is expected to be completed during the spring of the 2014 program year.

The City continues to promote affordable housing and worked to facilitate and support applications related to rezoning and construction for affordable housing during the 2013 program year. Although no lands were rezoned for affordable housing development during the 2013 program year, these activities are still current and ongoing.

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

The 2013 Action Plan listed four actions that were planned to address obstacles to meet underserved needs. These actions were: (1) Work with homeless housing and service providers toward development of an additional homeless facility in the City, (2) Work with service providers to assure that the CDBG-supported hygiene center is constructed, (3) Work toward providing additional access to public transportation to low and moderate income employees by providing expanded hours of service, and (4) Construct accessible sidewalks, curbs and gutters, and transit shelters to provide safe access to public transportation for disabled persons and low and moderate income neighborhoods.

The actions taken to address these obstacles during the 2013 program year were:

- 1) During the 2013 program year, an individual approached the Community Development staff with a development proposal. Staff determined it was a permissible use in the zoning district and is awaiting submission of a building permit. The individual would like to construct a Gospel Rescue Mission for men in need, and the facility will include approximately 40 beds, central dining, hygiene and support services.
- 2) The CDBG supported hygiene center was completed at the end of the 2013 program year and data will be provided in the 2014 CAPER.
- 3) The City expanded hours of public service transportation to provide access to low and moderate income employees, the new expanded hours went into effect on January 6, 2014 and are from 6 a.m. to 7 p.m.
- 4) The primary focus, and over half of the City's 2013 CDBG award went towards ADA Access and Sidewalk Ramps project. The ADA project has three phases; the first phase runs from 10th Avenue to 14th Avenue, the second phase runs from 14th Avenue to 16th Avenue, and the third phase runs from 16th Avenue to 18th Avenue. So far, the first phase has been completed and the second phase is half way finished. The third phase is expected to be completed around November, during the 2014 program year. Unfortunately, the Neighborhood Transit Shelters experienced a delay, but will be carried over and completed in the 2014 program year.



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

Because the City staff has experienced difficulties in finding contractors certified to work on pre-1978 homes and willing to work on these typically smaller residential rehabilitation projects in the SNAP program, the City staff is moving towards projects that do not trigger lead-based paint issues.

The City recognizes the health dangers posed by lead and continued its lead-safe practices in all residential rehabilitation projects. Educational materials regarding lead-based paint health hazards and abatement procedures are included in the SNAP information packets that were provided to those who prequalified for the program. Any dwelling that is built prior to 1978 that was accepted into the SNAP program received lead-based paint testing prior to any work being performed. The City will also add the HUD recommended brochure Protect Your Family From Lead In Your Home to the brochures available to the public and in the SNAP information packets.

While the City had not found a local business capable of providing the necessary lead-based paint testing required under HUD regulations (which caused the City to take a different approach in its CDBG program), the City received a visit from STRATA representative, Joshua T. Kannenberg P.G. Mr. Kannenberg informed us that he has the necessary qualifications to do lead inspections and is located in Pullman, Washington (about 32 miles away). This will significantly help the City reduce lead-based paint hazards.

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

The City continued to support the efforts of homeless providers in the community to end homelessness and continued to support economic development planning activities in the region to develop and strengthen employment opportunities. The goal over the period of the Consolidated Plan (2013-2017) is to move households successfully out of poverty. The Port Authority has continued to undertake actions to sustain/expand economic activity in the region which results in maintaining/expanding jobs available to low and moderate income persons.

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

The City attended meetings of the local homeless coalition to help explore ways the City can plan for and support additional homeless program resources and has moved towards projects that do not trigger lead-based paint issues.

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

The City of Lewiston has continued an already well-established relationship with community-based housing and social service groups in the city. The City continues to attend meetings of the local homeless coalition and explore ways to support and plan for additional homeless program resources. The City still continues to seek methods to meet Lead Based Paint requirements feasibly, but is also moving towards projects that do not trigger lead-based paint issues.

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

According to the Fair Housing and Equal Opportunity's review, the two relevant impediments are 1) the lack of sufficient acreage zoned, readily available, and appropriately located for multi-family resident zoning and development, and 2) discriminatory or potentially discriminatory advertising of rental housing relative to Fair housing.

In response to the lack of sufficient acreage zoned, readily available, and appropriately located for multi-family resident zoning and development, the City has not received any zone change applications during the 2013 Program year. On December 3, 2013 the City Planner presented a staff report to the Lewiston Planning and Zoning Commission. This staff report proposed Conditional Use Permit approval to construct 144 apartment units on approximately 10 acres in the Low Density Residential, R-2, Zoning District. Housing stock in Lewiston is older than in many other parts of the state. The city's Consolidated Plan regarding housing states that there is a low vacancy rate, which compounds housing



affordability problems, particularly for renters. The biggest factor contributing to the low rental vacancy rate is lack of supply of multi-family residential housing. The additional 144 apartment units would help improve this situation and lack of supply does not incent owners to upgrade the condition of their rental units. Construction has been slow and costs of providing new housing are steep, out of reach of lower-wage earners in the community, and the City encourages development of a diversity of affordable housing.

**Please see the attached table in regards to the City of Lewiston's action steps to remove barriers (as there is a limit on the number of characters) The Table will be attached to the hard copy due to the fact that IDIS will not allow the attachment to IDIS.**

In response to discriminatory or potentially discriminatory advertising of rental housing relative to Fair Housing, the City of Lewiston keeps brochures on hand for property owners and residents seeking rental housing. The City did not host any Fair Housing Training this year through the Intermountain Fair Housing Council, but arrangements are being made to host training in April of 2015.

The current and ongoing activities of the City are:

- Proactively and systematically seeking to rezone lands for affordable housing development.
- Proactively seeking developers to construct affordable housing.
- Facilitation and support of applications related to rezoning and construction for affordable housings.
- Expansion of public service transportation hours to provide access to low and moderate income employees, the new expanded hours went into effect on January 6, 2014 and are from 6 a.m. to 7 p.m.
- Current activity to install bus shelters in lower-income areas for the transit system.
- Introduction to a certified lead-inspector located in Pullman Washington, about 32 miles away.
- The Lewiston City Council has amended its ordinance adoption process for rezoning lands for affordable housing so they no longer require three complete and separate readings.

The new Analysis of Impediments update provides the City with recommended actions to address the concerns and impediments in the area. The City hopes to meet these recommendations in order to overcome the effects of impediments on fair housing choice.

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## 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**

Most of the City's CDBG funds for the 2013 program year have gone into either ADA Access Ramps and Sidewalks or the SNAP residential rehabilitation program. City staff monitors the progress of its residential rehabilitation projects through the inspection process (each major work component must pass City inspection prior to the release of funds to pay for the work), but does not typically conduct follow-up on SNAP properties. The City still receives monitoring information on the LCSC Adult Learning Center.

The City monitors activities by:

- Providing CDBG pages on the City of Lewiston website which provides information on the program, including accomplishments, program requirements, projects/activities currently funded, as well as those which are still available for application, directions on submitting a pre-application proposal as well as a formal application for funds, and links to HUD resources for subgrantees. Proposals and/or applications can be submitted at any time during the program year for consideration for funding as it becomes available or for the upcoming program year action plan;
- A formal application has been developed to capture the information required to be kept on file for CDBG subrecipients as well as more detailed project information;
- Subgrantees will be provided a portfolio of information with program requirements and links to HUD resources on the web as well as directed to the City's CDBG pages on its website where these links may also be found;
- Subrecipient agreements have been revised to conform to HUD requirements and will not be signed until all prerequisite documentation has been submitted by the applicant, project eligibility has been confirmed, environmental clearance has been obtained, and project timelines have been established; and
- If a subrecipient cannot complete a project in a timely manner as stated in the subrecipient agreement, the City will review the status and determine whether to extend more time or reprogram funds so that it may meet its own timeliness requirements.

All new activities are prequalified for eligibility prior to acceptance into the program. Spreadsheets track expenditures and award reimbursement. Rehabilitation activities, especially residential, require inspection for satisfactory work completion and code compliance prior to providing funds to subrecipients. The manual contains a reporting calendar/task schedule to ensure that project reporting requirements are being met on a regular base in compliance with the subrecipient agreements in each project file. When necessary, correspondence may be issued to remind subrecipients of their annual reporting requirements so that accomplishment data may be updated in IDIS on a regular basis in accordance with the calendar/schedule.

Since the City of Lewiston now has a certified lead inspector, compliance with lead paint regulations can be verified for any housing activity through inspections conducted prior, during, and after construction work for rehab projects.

Actions taken by the City to monitor its subrecipients are as follows:

- Check sheets developed for project files require complete documentation for each section to be obtained prior to moving forward with the project and next section of the worksheet;
- Site visits made by the CDBG administrator to monitor progress;
- Tracking systems developed where applicable to capture LMI beneficiary demographics that are accurate and consistent for IDIS reporting;
- Utilization of the Checklist for On-site Monitoring of a Subrecipient found in Appendix 5 of the *Managing CDBG* handbook by City staff;
- Project files are kept with information in regards to findings of eligibility, project application, environmental review, agreements/liens, permits/bids/invoices/receipts, and correspondence/miscellaneous.

**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.**

A display advertisement was to originally be published on November 9, 2014, but due to an error the hearing notice was actually published in the Sunday, November 16, 2014 edition of the Lewiston Morning Tribune. This advertisement announced the availability of the PY2013 CAPER, describing how to obtain a copy of the report, noting the public comment period beginning November 16, 2014 and providing contact information for Community Development Specialist Tanya Brocke for submission of comments.

A public hearing was held at the Lewiston City Council meeting on December 1, 2014. No comments were received at the public hearing or during the public comment period from November 16, 2014 to December 1, 2014. A hard copy of the approved city council meeting agenda item history/commentary, along with the public hearing notice was submitted December 2, 2014 with the 2013 CAPER.



## **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.**

The ADA Access and Sidewalk Ramps is currently in progress and is expected to be completed in the 2014 program year and is expected to improve accessibility and mobility for the City's disabled population. The Neighborhood Transit Shelters has experienced a delay, but is expected to begin drawing funds during the 2014 program year and is expected to improve accessibility to public transportation for 388 households in primarily low and moderate income neighborhoods. These projects focus on public improvement and infrastructure strategies of the Five-year Strategic Plan.

The City of Lewiston will work on ensuring that projects/activities continue in a timely manner. Unfortunately unexpected delays may happen, but activities should continue to progress. Due to the challenges of finding contractors certified to work on pre-1978 homes and willing to work on typically smaller residential rehabilitation projects in the SNAP program, the City staff is moving towards projects that do not trigger lead-based paint issues.

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

No



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## CR-60 – ESG 91.520(G) (ESG RECIPIENTS ONLY)

ESG Supplement to the CAPER in e-snaps  
For Paperwork Reduction Act

### I. Recipient Information—All Recipients Complete

#### Basic Grant Information

Recipient Name	LEWISTON
Organizational DUNS Number	040197261
EIN/TIN Number	826000219
Identify the Field Office	PORTLAND
Identify CoC(s) in which the recipient or subrecipient(s) will provide ESG assistance	

#### ESG Contact Name

Prefix  
First Name  
Middle Name  
Last Name  
Suffix  
Title

#### ESG Contact Address

Street Address 1  
Street Address 2  
City  
State  
ZIP Code  
Phone Number  
Extension  
Fax Number  
Email Address

#### ESG Secondary Contact

Prefix  
First Name  
Last Name  
Suffix  
Title  
Phone Number  
Extension  
Email Address

### 2. Reporting Period—All Recipients Complete

Program Year Start Date	08/01/2013
Program Year End Date	07/31/2014

### 3a. Subrecipient Form – Complete one form for each subrecipient



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**Subrecipient or Contractor Name**

**City**

**State**

**Zip Code**

**DUNS Number**

**Is subrecipient a victim services provider**

**Subrecipient Organization Type**

**ESG Subgrant or Contract Award Amount**



Table for CR-35 – Other Actions 91.220(j)-(k); 91.320(i)-(j)  
 Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a).

<b>2008-2013 Lewiston’s Action Steps to Remove Barriers to Multi-Family Housing and Increase Supply of Affordable Housing</b>				
<b>Year</b>	<b>Code</b>	<b>Title</b>	<b>Acres</b>	<b>Information</b>
2008	<ul style="list-style-type: none"> <li>• ZC-03-08</li> <li>• CU-09-08</li> <li>• ZA-06-08</li> </ul>	<ul style="list-style-type: none"> <li>• TCF from I to C-5 three (3) duplexes</li> <li>• Definition of Multi-Family</li> </ul>	<ul style="list-style-type: none"> <li>• +/- 38 acres</li> <li>• Citywide</li> </ul>	<ul style="list-style-type: none"> <li>• Allows multi-family w/o density limit</li> <li>• Allows duplexes in single family zone</li> <li>• Allows greater flexibility in what constitutes multi-family</li> </ul>
2009-2012	<ul style="list-style-type: none"> <li>• ZA-01-11</li> <li>• ZC-01-11</li> <li>• ZA-01-12</li> <li>• ZC-01-12</li> </ul>	Normal Hill Development Standards	650 acres +/-	Densely populated historic neighborhood previously non-conforming now conforming & new allowances for 2 <sup>nd</sup> units. 13 meetings and hearings.
2009	PUD-01-09	R-2 to PUD for 3 lots		Increased density by 2 units
2010	<ul style="list-style-type: none"> <li>• CPC-1-10</li> <li>• ZC-04-10</li> <li>• ZC-06-10</li> </ul>	<ul style="list-style-type: none"> <li>• Blum N-C to R-3</li> <li>• F-2 to R-1</li> </ul>	<ul style="list-style-type: none"> <li>• 3 acres</li> <li>• 4.76</li> </ul>	<ul style="list-style-type: none"> <li>• 72 Multi-family apartment complex</li> <li>• Increased density from 1 SF to 17</li> </ul>
2012-2013		Review R-3, R-4 zones in context of Analysis of Impediments to Fair Housing	City-wide	Staff approached land owners to rezone for multi-family. Nothing has come of it as yet. 4 hearings.
2013	CU-07-13	Blum CUP	10 acres	Originally planned 144 units, reduced to 120 units as a result of neighbor protest. Lawsuit ensued





## **LEWISTON PY2013 CAPER REVIEW – NARRATIVE SECTION**

### HUD Comment #1:

Report on citizen comments or views on the performance report –

### City of Lewiston Response:

See page 26 of the revised 2013 CAPER.

### HUD Comment #2:

The citation of examples from the two tables was insufficient and did not explain why progress was not made. Please revise and resubmit.

### City of Lewiston Response:

The city has revised and resubmitted the citation of examples. See pages 5 and 6 of the revised 2013 CAPER.

### HUD Comment #3:

Table comments – Table I – Improve public facilities and infrastructure – Households assisted – Actual – Strategic Plan – 43 with 6.14% completed; however Actual – Program Year – indicates 0 completed and 9% completed.

### City of Lewiston Response:

The Actual – Program Year – indicates 0 completed and should be 0% complete due to the 388 households benefitting from the Neighborhood Transit Shelters project, which has fallen behind schedule.

### HUD Comment #4:

It appears the city did not enter racial and ethnic composition of the families assisted into IDIS. Please enter the racial and ethnic composition data for all projects the city worked on during the year.

There was no correlation between the narrative provided and requirements for CR-10. Please revise the narrative to reflect the racial and ethnic composition of families assisted during the program year with CDBG funds.

### City of Lewiston Response:

The city has revised the narrative and has entered all available data for the racial and ethnic composition of families assisted. See page 7 of the revised 2013 CAPER.

### HUD Comment #5:

The narrative needs to discuss the geographic distribution and location for investments during the program year; i.e., where were the activities located that were worked on and or completed during the program year.



City of Lewiston Response:

IDIS does not allow the city to insert the geographic distribution; therefore in the narrative of the revised 2013 CAPER, on pages 8 and 9, the location for each project has been included.

HUD Comment #6:

In future submissions please include the amount of all of the leveraged funds.

City of Lewiston Response:

Staff will make note for future CAPER submissions.

HUD Comment #7:

The narrative states that 48 new affordable housing units were created; however, there were no CDBG dollars associated with the new units, which were reported on Table 6 – Number of Households Supported. As there were no CDBG dollars associated with the new units, only the 43 rehabilitated units reported under “number of households supported through rehab of existing units” should have been reported on Table 6. Please revise and resubmit the data on Table 6.

City of Lewiston Response:

The city has revised table 6 and resubmitted the 2013 CAPER. See page 14 of the revised 2013 CAPER.

HUD Comment #8:

This question (The city is to describe actions taken to reduce lead-based paint hazards) is not only about what CDBG funding the city used for projects that will reduce lead-based paint; it is also about what actions the city has taken to reduce lead-based paint hazards.

City of Lewiston Response:

The city has revised its response to the question. See page 21 of the revised 2013 CAPER.

HUD Comment #9:

The city did not describe any specific actions taken to affirmatively further fair housing or how the city is working to overcome the effects of any impediments identified in the jurisdiction’s analysis of impediments to fair housing choice. Please revise and resubmit.

City of Lewiston Response:

The city has revised the narrative. See pages 22-24 of the revised 2013 CAPER.

HUD Comment #10:

The narrative provided was insufficient to meet the requirements. Please revise by providing more information on the standards and procedures used to monitor CDBG 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 and resubmit.



City of Lewiston Response:

The city has revised the narrative. See pages 25-26 of the revised 2013 CAPER.

## **LEWISTON PY2013 CAPER REVIEW- IDIS REPORTS**

### Response to Review of IDIS Reports

#### PR-03

- Salvation Army Hygiene Center financing: The total funded amount, as listed on the PR-03 report totals \$133,000 (\$74,793.54 plus \$58,206.46) which corresponds to the drawdown and total funded amount on the IDIS system as \$133,000. The 2012 Action Plan originally provided the Salvation Army Hygiene Center with \$116,000 and the amount was increased to \$133,000.
  - No numbers, income data or annual accomplishments were entered into IDIS due to the fact that the project was completed during the 2014 program year. Data and other information will be included with the 2014 caper.
- The 2012 Admin Activity #47 was funded a total amount of \$3,736.14 that was used for ads, publications, etc. while the 2012 Admin-Plans Activity #48 was funded a total amount of \$46,000 (\$5,500 from EN and \$40,500.00 from PI) which was used for the Consolidated Plan and Analysis of Impediments updates.
- ADA Financing - \$206,143 was programmed from the 2013 Year, while the amounts of \$11,577.52 (PY2010), and \$112,750.46 (PY2011) were reprogrammed into the project, this information is provided on IDIS – thus giving the total amount of \$330,470.98.
  - No annual accomplishments narrative was entered into IDIS due to the project not being completed yet. As noted in the 2013 CAPER, the project is expected to be completed early spring of the 2014 Program year.
- Neighborhood Transit Shelters
  - No annual accomplishment was entered into IDIS due to the project falling behind. A remediation plan is being drafted in order to get the project caught up.
- 2013 Admin
  - IDIS will not allow the CDBG Administrator to enter the proposed accomplishment data, as well as annual accomplishment data. The CDBG Administrator is waiting for Technical Assistance to explain this problem, but the [www.hudexchange.info/get-assistance/my-question/](http://www.hudexchange.info/get-assistance/my-question/) informs the Administrator that the CDBG and HOME Ask a Question desks are closed and no longer accepting questions.
  - Drawdowns for the 2013 Admin include:
    - January 3, 2014 total amount of \$1,562.28
      - Lewiston Tribune ads for CAPER, NOI-RROF/FONSI - \$1,528.80
      - FedEx Overnight shipping for 2012 CAPER - \$33.48



- May 22, 2014 total amount of \$1,145.10
  - Lewiston Tribune ads for 2014 CDBG Project proposals - \$610.32 and \$534.78
- November 20, 2014 total amount of \$2,287.10
  - Travel for CDBG training in Indiana - \$1,882.49
  - Travel for CDBG training in Richland, WA - \$404.61



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