

### City of Auburn, Maine

Community Development 60 Court Street | Auburn, Maine 04210 www.auburnmaine.gov | 207.333.6600

### Citizen's Advisory Committee Meeting Agenda June 17<sup>th</sup>, 2022 @ 10am Community Development Conference Room - 95 S. Main St 4<sup>th</sup> Floor

- 1. Review Annual Action Plan
  - a. Formal recommendation to City Council.
- 2. Adjourn

# Community Development Block Grant & Auburn-Lewiston HOME Consortium

ACTION PLAN | Program Year 2022

City of Auburn Business & Community

Development Department



# auburnmaine

### **Executive Summary**

### AP-05 Executive Summary - 91.200(c), 91.220(b)

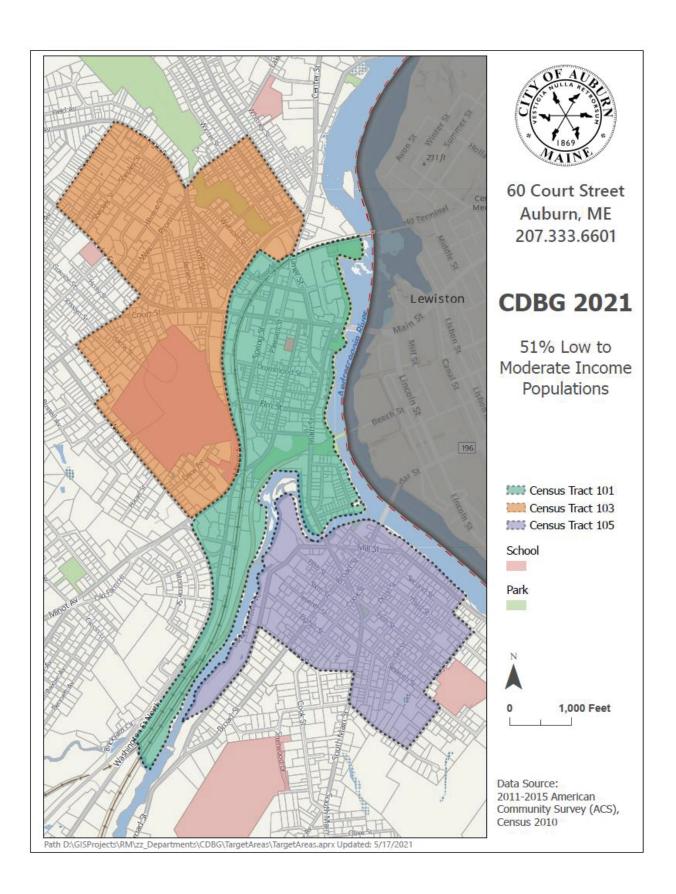
### 1. Introduction

The City of Auburn is submitting its PY22 Action Plan with the U. S. Department of Housing and Urban Development (HUD). The national purpose of the Community Development Block Grant (CDBG) program is the development of viable urban communities by providing decent housing, a suitable living environment, and expanding economic opportunities principally for persons of low and moderate income. The national purpose of the HOME Investment Partnership (HOME) program is to create affordable housing for low-income households.

The City of Auburn has adopted the 2020-2024 Consolidated Plan (PLAN) for the CDBG program and the HOME program which includes both the City of Auburn and Lewiston. The PLAN identifies many community challenges and unmet needs, establishes priorities, and describes how these federal resources will address unmet needs. The PLAN also establishes goals, objectives, and performance benchmarks for measuring progress. These are used as a framework for determining prioritization of requests and the development of individual program guidelines while establishing conditions of support and recipient expectations.

CDBG funds are targeted to areas of the community in which there is a high proportion of low- and moderate-income people as well as for housing improvement programs throughout the jurisdiction which serve this target population. The uses of funds are limited to housing improvements, elimination of blight, infrastructure improvements, job creation, and providing of essential social services. So long as the national test is met, there is an amount of flexibility in the use of the funds, although CDBG funded social service spending is capped at 15% of the annual allocation.

This Action Plan describes the third-year budget and proposed activities to be carried out while advancing the goals and objectives set forth in the PLAN. Identified within this plan are 11,965 households in Auburn & Lewiston (47%) which qualify as being under 80% HUD Area Median Family Income (HAMFI). This means nearly half of households in Auburn & Lewiston are considered Low-moderate income and qualify for assistance under the CDBG or HOME programs. Additionally, the Comprehensive Housing Affordability Strategy (CHAS) contained within the Consolidated plan demonstrates that 54% of the households identified as Low- to Moderate income have at least 1 child under the age of 6 years.



### 2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

### **GOALS OF THE 2020-2024 CONSOLIDATED PLAN**

The Auburn Community Development Office (ACDO) intends to work towards measurable outcomes established when the 2020-2024 Consolidated Plan was adopted. This plan established the 4 goals and outcome expectations indicated below:

### **Goal 1: Provide Safe & Affordable Housing**

- 100 Rental Units Rehabilitated
- 50 Homeowner Units Rehabilitated
- 125 Tenant Based Rental Assistance

### **Goal 2: Improve Infrastructure & Reduce Blight**

• 3,000 Persons Assisted

### **Goal 3: Promote Economic Opportunities**

- 10 Jobs Created/Retained
- 10 Businesses Assisted

### **Goal 4: Provide Essential Services**

500 Persons Assisted

### 3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

**Federal oversight:** U.S. Department of Housing & Urban Development (HUD) oversees all funds invested into the cities through their respective Community Development Offices. In response to a recent city audit and on-going monitoring conducted by HUD, compliance reviews and substantial corrective actions have been carried out during PY21 for both cities of the consortium. Within this process all new

policies, program guidelines and standard operating procedure manuals were developed. In concert with HUD staff, programs were discontinued or substantially rebuilt as to be compliant with federal regulations, and an all-new staff has been brought in and trained to oversee and ensure compliance of these programs. Additional monitoring and corrective actions will continue through PY22 as the ACDO continues to improve processes redevelopment and compliance measures. Because of this extensive process there were a limited number of new projects begun in PY21.

As ACDO worked with HUD staff to correct previous year's financial and project reporting data it was necessity to conduct extensive internal quality control checks to re-qualify projects already under way. A limited number of projects which had already begun or had been completed prior to PY21 have now been deemed to be out of compliance with HUD requirements. For cases which cannot be brought into compliance the City of Auburn will be seeking to complete a Voluntary Grant Reduction (VGR) from the PY23 allocation. This process requires ACDO staff to revise previous year's impact numbers contained within the Consolidated Annual Performance Evaluation Report (CAPER) by removing projects which were deemed non-compliant with HUD requirements. The result is a reduction in not only PY21 impact metrics but in the PY20 & PY19 previously reported performance reports.

**Citizen Participation:** This plan includes a revision of the Citizen Participation Plan. During PY21 there was a consistent problem attracting new committee members and achieving the required quorum of appointed members to conduct business. Three separate meetings of the Citizens Advisory Committee (CAC) failed to achieve a quorum and one failed to have any members presents. In response to the difficulties in public meetings caused by Covid-19 precautions and the lack of committee participation the ACDO took new efforts to solicit input from a wider breadth of the Auburn and Lewiston communities.

The ACDO piloted a new, annual survey for housing matters. This survey, now set in policy to be conducted annually prior to the development of the Annual Action or Consolidated plans, will be more effective and equitable at influencing and informing programmatic decisions while also better accommodating a more diverse population who, for language, time, resources, and comfort levels may otherwise not have been included under the previous citizen participation model. By simultaneously using traditional methods of direct outreach through local service hubs as well as modern technology and social media to appeals to people at their homes or on their mobile devices greater accessibility and inclusiveness was achieved in the development of this plan.

This revision will allow for programmatic efficiencies to be made in the determination of community needs assessments from a broader participation base. It serves to better inform staff by providing quantifiable data points which are otherwise not available from the state or national surveys traditionally utilized and aids the department in more rapidly developing programmatic improvement based on concrete and measurable needs assessments which were not readily available.

### 4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The Action Plan for the city of Auburn and the Auburn-Lewison Consortium is due to be released each year by March according to the included draft citizen Participation Plan and relevant HUD guidelines. In March of 2022 HUD released CPD Notice 22-05, which suspended this process and related requirements until the formula-based allocations are published by HUD. These allocations, due to various approval delays at the federal level, were not made available to the city of Auburn until May 16, 2022. The ACDO will hold the final Public Hearing and approval of the draft Action Plan on July 18th.

Prior to the development of this Action Plan a community needs survey was circulated in 5 languages. This survey method utilized digital as well as paper surveys which were distributed at key service points within the city including food pantries, youth centers, head start service providers and municipal offices. The result was over 362 households including over 1,000 residents being received. This information, along with direct consultation efforts with area service provider partners helped craft the plan as presented.

The Citizen Advisory Committee, at their meeting on December 21, 2021, agreed that prioritization of the following four national objectives will be used to distribute Public Service Grant allocations: Senior Services (05A), Youth Services (05D), Battered & Abused Spouses (05G) and Other (05Z) to be used for the support of Auburn's community garden and food security programs.

The consultation process also entailed direct correspondence with dozens of area service providers. By educating them on the specifics of the qualified population as defined by HUD in CPD notice 21-10 this outreached further solicited quantifiable or anecdotal narratives which may serve to highlight unmet needs they regularly encounter. Additional meetings were held with members of a new regional homelessness service provider coalition and the MaineHousing HUB Coordinator housed within Lewiston Housing Authority. The information contained within these letters and discussed at these gatherings highlighted the lack of unreliable data to effectively quantify the size and needs of the at-risk community as defined.

Adoption of the CDGB and HOME Action Plans and budgets require a 30-day public comment period. This plan was made available for further public input on June 1, 2022. This is concluded with a Workshop with the City Council and a final Public Hearing. The Public Notice for these hearings as well as the solicitation of public input was run in the Sun Journal, was posted on the city's website and social media accounts to solicit the maximum input possible. The Action Plan & supplemental information were available on the City's website.

### 5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

Comments received will be summarized here.

6. Summary of comments or views not accepted and the reasons for not accepting them

Comments responses will be summarized here.

7. Summary

STRATEGY #1: PROVIDE SAFE & AFFORDABLE HOUSING

**Description:** Auburn's Funds from the CDBG program will be used to provide matching funds to leverage the city's Lead Hazard Control program. This will greatly increase community impact by focusing on reducing the amount of hazardous housing units occupied by children and low-to-moderate income families. Additional new unit development projects will begin utilizing previous-year HOME funds. These units are not expected to be completed within the current project year but will be included in production goals in the subsequent 2 Action Plans.

Anticipated Outcomes: 25 Rental Units Rehabilitated, 10 Homeowner Units Rehabilitated, 1 Rental Unit Created, 3 Homeowner Housing Units Created, 30 Tenant-households Rental Assistance, 5 Homebuyers

assisted

STRATEGY #2: IMPROVE INFRASTRUCTURE & REDUCE BLIGHT

**Description:** Funds will be used to address blight remediation, continue the Neighborhood Challenge grant program as well as continue the development of publicly owned infrastructure and amenities within targeted neighborhoods. Additional focus will be placed on addressing distressed buildings and

code violations.

**Anticipated Outcomes:** 

1,000 Persons Assisted.

STRATEGY #3: PROMOTE JOBS AND ECONOMIC OPPORTUNITY

Business Loans will be provided to businesses city wide, with a focus on promoting entrepreneurship through the development of the Auburn Incubator Kitchen & Learning Center, a facility located at Pettengill road. This programming is supplemented by funds previously approved within the CDBG-CV

budget.

**Anticipated Outcomes:** 10 Business Loans

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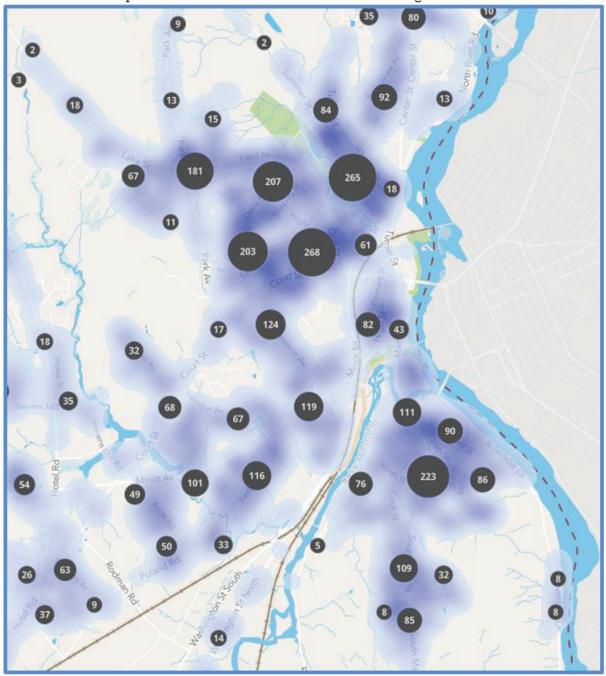
### **STRATEGY: PROVIDE ESSENTIAL SERVICES**

**Description:** The Citizen Advisory Committee recommended setting 4 qualified services as budgetary priorities. The committee agreed to focus the Public Service budgets on, in order of priority, Senior Services (05A), Youth Services (05D), Battered and abused Spouses (05G) and Other (05Z) which is reserved to support the City's community garden and food security programs.

**Anticipated Outcomes:** 500 Persons Assisted.

### Identified: Auburn Neighborhoods with high concentration of homes built prior to 1978.

These homes have a potential for Lead Paint Hazards which causes negative health effects in children.



# PR-05 Lead & Responsible Agencies - 91.200(b)

# Agency/entity responsible for preparing/administering the Consolidated Plan

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name		Department/Agency
Lead Agency	AUBURN		
CDBG Administrator	AUBURN	City of Auburn Business 8	City of Auburn Business & Community Development
HOPWA Administrator			
HOME Administrator	AUBURN	City of Auburn Business &	City of Auburn Business & Community Development
HOPWA-C Administrator			

Table 1 – Responsible Agencies

## Narrative

The consortium was formed to meet the funding threshold for HOME funds. Historically, ten percent of the current year allocations and program Admin funds to cover the overall administration of the program for the Consortium. Lewiston utilizes the remaining 30% for their administration In 2001, Auburn and Lewiston formed a consortium with Auburn as the lead agency to receive HOME Investment Partnerships Program funds. updated and re-approved within PY22. Any negotiated changes or updates to the agreement will be included within subsequent action plans. costs. The balance of current year allocations is then divided evenly between both cities to provide programing. This agreement is set to be income combined can be set aside for administration of the HOME program. Auburn, serving as the program sponsor, utilizes 70% of these

The current consortium agreement includes provisions that each member city is responsible for conducting programs and required monitoring in compliance with HUD regulations. This agreement also outlines the responsibility of the City of Auburn, in its role as Representative Member, to step in and to manage and monitor another member's programs upon receipt of written notification of any member that may not be able to meet the standards established by HUD. At this time no notice has been given.

# Consolidated Plan Public Contact Information

The PY22 Action Plan is the 3rd year of the 2020-24 Consolidated plan. Comments may be submitted at any time to the Auburn Community Development Office, 60 Court Street, Auburn, ME 04210, tel. 333-6601 or via e-mail at CDBG@auburnmaine.gov

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### AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

### 1. Introduction

In addition to a public survey and meeting of the Auburn Citizens Advisory Committee the city of Auburn has been in continual dialogue with Maine State Housing, the Auburn Housing Authority, private developers, and community service providers in a concerted effort to develop new communications channels. These efforts are substantially focused on activities which address the needs of individuals who are homeless, at risk of homelessness or otherwise identified as a Qualified Population (QP) under the HOME-ARP program requirements.

This Annual Action plan can and should recognize the tandem development and submissions of the Annual Action plans and the HOME-ARP plan. The development of these two plans included direct outreach and solicitation of needs assessment data from organizations and partners as outlined below.

The city has also increased its direct consultation and resiliency planning with the local Emergency Management Agency, state, and local health agencies as well as first responders such as local Police, Fire and Sherriff departments. These partnerships are in a response to emergent climate changes, civil emergencies such as homelessness, food insecurity and substance/mental health concerns within the community.

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(I)).

The Maine State Housing Authority works with homeless service providers and other organizations toward a shared goal of preventing and eliminating homelessness in Maine. Collaborative efforts include the Continuum of Care (COC) a group of service providers serving a particular geographic area who work together to develop programs that address homelessness. Lewiston and Auburn are part of the Maine State Continuum of Care. This plan also includes the recent appointment of a Hub Coordinator housed within the Lewiston Housing Authority. This position will serve as a coordinated entry position for the COC services as well as a point for consolidating locally generated homelessness service data.

Locally, providers who address the continuum of homeless services for the area collaborate through the Lewiston-Auburn Alliance for Services to the Homeless (LAASH). LAASH works to improve access to services and housing for persons who are homeless or at risk of homelessness. This group 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 group meets monthly to focus on local homeless issues and provide a forum for educating its members. Auburn and Lewiston Community Development staff participate in LAASH,

and a consultation meeting with LAASH informed the needs and priorities of the Consolidated and Action Plans.

During consultation the ACDO identified that the traditional assessments and sources of data would not adequately demonstrate a modern GAP analysis for the identified Qualified Populations (QPs) for two specific reasons. First, traditional sources of data, such as the American Community Survey (ACS) or the Comprehensive Housing Affordability Strategy (CHAS) were most recently completed in 2019, prior to the onset of the Covid-19 pandemic. Second, the ongoing impact of the Covid-19 pandemic has negatively impacted more recent efforts to update this traditional data, including regional Point in Time (PIT) studies. Many of these annual studies have been put on hold altogether, or recent surveys have demonstrated detrimentally small respondent numbers.

Instead, the ACDO cultivated local data sources from other public housing providers, private and government health, mental health, and emergency service providers. By using data generated by the Auburn Fire Department's incident reporting system the ACDO confirmed officers had 198 separate encounters with homeless individuals from March 2020 to March 2022 with the second year containing 113 recorded encounters. This establishes a 34% increase from the previous year, a relation directly inverse to the trend demonstrated by state-level assessments. Of the 51 contacts with homeless individuals that the Auburn Fire Department serviced in the last 3 months, 87% if those involved substance abuse, Anxiety/psychiatric individuals, or those with exposure to the elements.

In order to combat the lack of recent, or post-covid data the ACDO employed tactics to collect meaningful and informative data regarding the size, demographic makeup and unmet needs of the local population. ACDO staff has reached out to local homeless service providers, community advocates, educational institutions, veterans' groups, community action programs, state agencies, domestic violence organizations, public housing authorities, and mental healthcare providers. This outreached included an appeal to these organizations to provide quantifiable data on hand or anecdotal narratives which may serve to highlight unmet needs they regularly encounter.

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.

On October 27th, 2021, Maine Housing and the CoC held a focus group to assess needs of homeless persons service providers and establish funding priorities. 59 persons were in attendance including homeless persons, and representing state, federal and local government staff, Senator King's office, housing providers, homeless shelters, interested citizens, mental health, health, nutrition, and substance abuse providers. The Auburn-Lewiston Consortium is not an ESG recipient, however there are multiple area homeless agencies that deal directly with the ESG program administered by Maine Housing.

The City of Auburn has integrated not only the Community Development Office but their General Assistance and Public Health Offices to combined efforts with groups like LAASH and its constituent parts. These three offices within Auburn have met with and continue to share resources and coordinate services and referrals with the HUB Coordinator. New positions created within the HOME-ARP plan will work in partnership with the HUB Coordinator to provide outreach and direct services to qualified populations of homeless and at-risk residents.

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

In 2017 LAASH membership agreed that as a group, LAASH did not have the capacity to undertake the work and the expense of updating the 2009 10-year plan to end homelessness. LAASH members agreed to use the Statewide Homeless Council's updated plan as the on-going framework for advocacy and assessments. Unfortunately, before the creation of the HUB Coordinator position to be housed locally the data collection and service coordination provided under this fell short of expectations. Organizations initially bought into the HMIS system locally ceased to enter data and the local homelessness counts regularly under-reported the actual populations.

Statewide Homeless Council went through the process of updating their plan to end homeless in 2017, which served as a guide for LAASH members. The interaction with CoC service providers was revisited in June of 2021 during the Maine Homeless System Re-Design Initiative. This report detailed new funding priorities and access to care processes for all of the local service hubs which utilize ESG funds. This new effort is welcomed locally and ACDO staff have worked to dovetail the current Action Plan and HOME-ARP plan to fit within identified gaps in the continuum of care. Primarily, these gaps have been identified at the early intervention and crisis response phase of homelessness. By utilizing new funding sources, the ACDO will be able to establish itself as a consistent resource for the HUB Coordinator and the COC system.

2. Agencies, groups, organizations and others who participated in the process and consultations

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	MAINE STATE HOUSING AUTHORITY
	Agency/Group/Organization Type	Housing PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was consulted as data source for Point in Time reporting as well as continued coordination of the Continuum of Care. Consultation and coordination of activities is on-going. ACDO staff has consulted with the MSHA HUB Coordinator to ensure that plans being developed will be complimentary in nature.
2	Agency/Group/Organization	Maine Department of Labor
	Agency/Group/Organization Type	Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was consulted through public services survey. MDOL is a great resource for labor information that informs community leaders as they make decisions that affect the local economy. Consultations with MDOL regarding workforce development efforts within the city is ongoing.

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n	Agency/ Group/ Organization	עפנפומוט וווכ
	Agency/Group/Organization Type	Services - Housing Services-homeless Services-Health
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Needs - Veterans
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was consulted through public services survey and participates in the LAASH group. It is anticipated that Veteran's Inc. will continue to participate in advocating for homelessness and other veteran concerns.
4	Agency/Group/Organization	Community Clinical Services
	Agency/Group/Organization Type	Services-Health Health Agency
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was consulted through public services survey. There is an opportunity to increase coordination with Community Clinical Services with other service providers serving the homeless.
2	Agency/Group/Organization	AUBURN HOUSING AUTHORITY
	Agency/Group/Organization Type	Housing PHA Service-Fair Housing

	what section of the Plan was addressed by	Housing Need Assessment
	Consultation?	Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of	Agency was consulted through public services survey. Auburn Housing will remain a partner in executing multiple activities anticipated in the consolidated plan, such
	the consultation or areas for improved coordination?	as TBRA and Community Housing Development. Consultation and development activities with AHA are on-going.
9	Agency/Group/Organization	WESTERN MAINE COMMUNITY ACTION
	Agency/Group/Organization Type	Services-Children
		Services-Employment
		Health Agency
		Other government - State
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children
	Briefly describe how the Agency/Group/Organization	Agency was consulted through public services survey. Western Maine Community
	was consulted. What are the anticipated outcomes of	Action will continue to help area residents access available resources and
	the consultation or areas for improved coordination?	programs. Workforce development programing in coordination with WMCA is ongoing.
7	Agency/Group/Organization	LEWISTON-AUBURN TRANSIT COMMITTEE
	Agency/Group/Organization Type	Other government - Local
		Regional organization
		Planning organization
	What section of the Plan was addressed by	Homelessness Strategy
	Consultation?	Anti-poverty Strategy

	Briefly describe how the Agency/Group/Organization	Agency was consulted through public services survey. The Transit Committee
	was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	provides valuable insignt to local transportation policies that may affect housing decisions. The city of Auburn is continuing to work directly with the LA transit
		committee on transportation design and optimization assessments.
<sub>∞</sub>	Agency/Group/Organization	Seniors Plus
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of	Agency was consulted through public services survey. The creation of the Senior Center in Auburn that Seniors Plus will increase program coordination with the
	the consultation or areas for improved coordination?	Rec Department. SeniorsPlus is an existing Public Service grant awardee and works regularly with city staff.
6	Agency/Group/Organization	SAFE VOICES
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Victims of Domestic Violence Services-homeless Services - Victims
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was consulted through public services survey. Safe Voices assists in carrying out homeless goals of the consolidated plan. They are one of the areas most active agencies for domestic violence victims. Safe Voices is an existing Public Service grant awardee and works regularly with city staff.

10	Agency/Group/Organization	COMMUNITY CREDIT UNION
	Agency/Group/Organization Type	Services-Education Business Leaders Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Market Analysis Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was consulted through public services survey. The Community Credit Union has been making efforts in the community to provide banking services needed by low/mod households.
11	Agency/Group/Organization	RAISE-OP HOUSING COOPERATIVE
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was consulted through public services survey. Raise-Op Coop has successful experience with the HOME and CDBG program and provides valuable insight to the housing market. City staff has met with Raise-op regarding the administration and founding of new, city constructed co-op housing options.
12	Agency/Group/Organization	LA Metro Chamber of Commerce
	Agency/Group/Organization Type	Services-Education Services-Employment Regional organization Business Leaders

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	What section of the Plan was addressed by	Market Analysis
	Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of	Agency was consulted through public services survey and community leaders regularly attend Chamber events. The Chamber provides valuable insight of the
	the consultation or areas for improved coordination?	local economy and needs of area employers. City staff works regularly with the Chamber regarding workforce development activities.
13	Agency/Group/Organization	NEW BEGINNINGS, INC.
	Agency/Group/Organization Type	Services-Children
		Services-homeless Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Needs - Unaccompanied youth
		Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of	Agency was consulted through public services survey. New Beginnings is a local shelter servicing runaway and homeless youth.
14		COMMUNITY CONCEPTS, INC.
	Agency/Group/Organization Type	Services - Housing Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Lead-based Paint Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of	Community Concepts works regularly with staff from both Lewiston and Auburn. They provide many needed services to area low/mod households, including
	the consultation or areas for improved coordination?	housing, transportation, health, employment, and others. CCI has provided essential information and community needs data including the Emergency Rental Assistance program and community needs assessments.
15	Agency/Group/Organization	John T. Gorman Center
	Agency/Group/Organization Type	Civic Leaders Foundation
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was consulted through public services survey. They have four priority areas: improving educational achievement for young children; promoting successful transitions to adulthood for vulnerable older youth; helping struggling parents support their families and enabling low-income seniors to age in place.
16	Agency/Group/Organization	Maine Center for Disease Control and Prevention
	Agency/Group/Organization Type	Health Agency Other government - State
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was consulted through public services survey and is relied upon for public health data. The department is responsible for the State's lead paint response and makes regular referrals to the city in the case of Elevated Blood Lead Level (ebll) cases in children. The city meets quarterly with CDC staff in relation to the Lead Hazard Control grant.

17	Agency/Group/Organization	Androscoggin Valley Soil and Water Conservation District
	Agency/Group/Organization Type	Agency - Managing Flood Prone Areas Agency - Management of Public Land or Water Resources Regional organization
	What section of the Plan was addressed by Consultation?	Hazard Management
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Androscoggin Valley Soil and Water Conservation District goals are determined by using recommendations from partners, the Natural Resources Assessment, and our their internal review process. These tasks are broken down as follows; providing technical assistance, improving public relations, improving outreach and educational assistance improving funding opportunities
18	Agency/Group/Organization	Androscoggin Land Trust
	Agency/Group/Organization Type	Agency - Managing Flood Prone Areas Agency - Management of Public Land or Water Resources Regional organization
	What section of the Plan was addressed by Consultation?	Conservation
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Androscoggin Land Trust regularly works with community leaders with the conservation along the Androscoggin River. The strategic focus of the Androscoggin Land Trust includes conserving areas of ecological importance, working farms, and forests, and the promotion of outdoor experiences on and around the Androscoggin River Greenway. The ALT is also a managing member of the Auburn Community Gardens and meets regularly with city staff.

19	Agency/Group/Organization	COMMUNITY CONCEPTS FINANCE CORPORATION
	Agency/Group/Organization Type	Services-Education Services-Employment Regional organization Community Development Financial Institution
	What section of the Plan was addressed by Consultation?	Market Analysis Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	CCFC is a CDFI providing financial educational resources and access to capital for regional families and businesses. Their program directors were consulted during the creation of this plan and they will be an ongoing partner in the development and delivery of improved program impacts. City staff makes regular referrals to CCFC financial coaching and Homebuyer educational classes as a requirement of o-going education for program participants.
20	Agency/Group/Organization	Androscoggin Valley Council of Governments
	Agency/Group/Organization Type	Services-Education Other government - Local Regional organization
	What section of the Plan was addressed by Consultation?	Market Analysis Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	AVCOG is a regional council of government providing financial educational resources and access to capital for regional businesses. Their program directors were consulted during the creation of this plan and they will be an ongoing partner in the development and delivery of improved program impacts.

21	Agency/Group/Organization	Auburn Police Department
	Agency/Group/Organization Type	Services - Victims Other government - Local
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted with Chief of Police regarding homelessness activities and strategies. Auburn Police Department is a partner in the newly developed Homelessness outreach and crisis mitigation efforts carried out by Community Development staff.
22	Agency/Group/Organization	Auburn Fire Department
	Agency/Group/Organization Type	Services - Victims Other government - Local
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted Fire Chief regarding interactions and unmet needs of homeless population. Auburn Fire Department is a partner in the newly developed Homelessness outreach and crisis mitigation efforts carried out by Community Development staff.
23	Agency/Group/Organization	AUBURN SCHOOL DEPARTMENT
	Agency/Group/Organization Type	Services-Education Child Welfare Agency
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation with School Department and Adult Education staff regarding Mckinney Vento services and transportation needs of students. Auburn School Mckinney Vento liaison is a partner in the newly developed Homelessness outreach and crisis mitigation efforts carried out by Community Development
		staff.
24	Agency/Group/Organization	Lewiston-Auburn Alliance for Services to the Homeless (LAASH)
	Agency/Group/Organization Type	Regional organization Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children
		Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Cities of Lewiston and Auburn participate as Members of LAASH and gather monthly to discuss service needs and coordinating responses.
25	Agency/Group/Organization	New Auburn Neighborhood Watch
	Agency/Group/Organization Type	Neighborhood Watch Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Local security
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Held multiple listening session with the Auburn Neighborhood watch group regarding affordable housing and homelessness services.

26	Agency/Group/Organization	Androscoggin Emergency Management Agency
	Agency/Group/Organization Type	Housing
		Services - Victims
		Agency - Managing Flood Prone Areas
		Agency - Emergency Management
		Other government - County
		Regional organization
	What section of the Plan was addressed by	Housing Need Assessment
	Consultation?	Homeless Needs - Chronically homeless
		Homeless Needs - Families with children
		Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization	The city consulted with the EMA Director in preparation of this Action Plan. The
	was consulted. What are the anticipated outcomes of	city reviews and participates in the development of the Natural Hazard Mitigation
	the consultation or areas for improved coordination?	plan which focuses on community planning and preparedness involving
		environmental climate changes (including flooding and storm impacts),
		community lifelines and housing.

Identify any Agency Types not consulted and provide rationale for not consulting

No agency types were intentionally not consulted.

# Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Maine State Housing Authority	The Cities of Auburn and Lewiston have formed a consortium to qualify for HOME Investment Partnerships Program funds whereby the grant is shared by both cities. The 3-year HOME Consortium plan includes a consultation process with Maine State Housing Authority for the recertification. Lewiston and Auburn Community Development staff both participate in the Lewiston-Auburn Alliance for Services to the Homeless (LAASH), which meets monthly. As part of the process to develop the 2020-2024Consolidated Plan, the Auburn and Lewiston Community Development staff work closely on both the development and implementation of the plan. Both Lewiston and Auburn have continued the development of new, affordable rental units. Coordination of General Assistance and Public Health offices with the Coordinated entry system and emergency shelters.
Natural Hazard Mitigation Plan	Androscoggin EMA	This plan addresses the potential impacts of climate change and social emergencies utilizing the HAZUS method, a model for estimating the risk of damage from earthquakes, floods, solar flares, hurricanes, and other known hazards. This plan identifies a potential 866 households (1,225 individuals) which would need sheltering in response to flood impacts. Additionally, this plan estimates 2,323 individuals which would require emergency shelter options in response to a potential increase in hurricane damage.
Analysis of Impediments to Fair Housing Choice	Maine State Housing Authority	Published in October 2019, this plan recognizes similar impediments at the state level as are seen locally, including: Lack of Affordable Housing unit development, Racial and Ethnic barriers and zoning difficulties posed by NIMBYism efforts (discrimination by communities and neighbors).
Hope & Opportunity for ME	Coordinated Community Plan (CCP) Planning Committee	This HUD funded Youth Homelessness Demonstration Program (YHDP) is the result of a \$3.3 mil planning and Technical Assistance grant to assess and respond to the needs of homeless youth and young adults in Maine. Plan identifies additional partners including Department of Education, DHHS and identified coordinated entry positions. This initiative will not only increase the efficacy of data collection and analysis within the HMIS system but increases coordination between service provider partners.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
		This plan focuses on established priorities which provide for the quality of life for not just the
Comprehensive Plan,	22.14.10 to 14.10	current, but future residents of Auburn. It outlines specific zoning and services to be
2021	City of Adodin	equitably provided across the diverse types of neighborhoods, from rural to high-density
		urban and everything in between.
C+r2+04ic D10	ميانانان کو بران	The city Strategic Plan establishes 3 committees which oversee the implementation and
Strategic Fram, 2013	City of Addulli	progress being made as outlined within the city Comprehensive Plan.

Table 3 – Other local / regional / federal planning efforts

## Narrative

Community Development Staff. This new internal integration of service delivery provides a more holistic approach to the delivery of services. The City of Auburn has incorporated the General Assistance office as well as the Public Health officer into regular, weekly meetings with

households, including Spectrum and Consolidated Communications. Lewiston and Auburn are both served by multiple broadband providers, but Wireless, and available satellite providers. Cost is often the major factor whether a household is connected or not, especially for the rural LMI Auburn and Lewiston are both comprehensively covered by broadband providers: Spectrum, Consolidated Communications, GWI, RedZone households or those located further away from the public right of way. Many of the providers offer programs for qualifying low/mod increased competition typically benefits consumers.

increased in climactic changes (as caused by climate change & solar flares) as well as civil needs including food insecurity, migration/immigration increased flooding in the 100-year floodplain may increase due to climate change. the most recent EMA flood impact analysis report indicates a and housing stresses within Auburn and Lewiston. Lewiston and Auburn are located on the banks of the Androscoggin River. The potential for The consortium is working regularly with the Androscoggin County Emergency Management Agency in the assessment and preparation of increased natural hazards such as floods, hurricanes, and civil emergencies. This type of resiliency planning is in response to a measured potential 866 displaced households (1,225 individuals) estimated to need emergency shelters during a major flood event.

Many rural house lots in the area are supplied by personal wells that can run dry if a drought is experienced. The most recent severe drought Department of Agriculture. Drought has been more regularly addressed through consultation with the City Water department or emergency recorded which received a formal disaster designation in 2020 and provided support to farms and low income homes through the US

repair program for private wells. Risk mitigation by flooding from the Androscoggin river or its tributaries is continually monitored and responses are being developed with regular partnerships with AVCOG, Androscoggin Land Trust & the Androscoggin Valley Soil & Water Conservation.

### AP-12 Participation - 91.401, 91.105, 91.200(c)

### 1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

For this PY22 annual Action Plan further improvements to increase participation are incorporated. The addition of an annual, locally focused, and managed housing and community needs assessment within this revision will allow for greater programmatic efficiencies to be implemented based on sound data.

These changes include more pragmatic improvements which directly respond to the current needs of community residents. The primary need is to solicit greater participation in the identification of local community needs on an annual basis. By developing and refining a local survey program, which demonstrates more diversity while eliminating traditional (or Covid-19) barriers to participation, city staff will be better prepared to respond to new and rapidly changing needs of Auburn and Lewiston residents.

In response to the difficulties in public meetings caused by Covid-19 precautions and the lack of committee participation the Community Development staff took a combination of new and traditional efforts to better solicit input from a wider breadth of the Auburn community. By simultaneously using technology and social media to appeal to people at home or on their mobile devices in 5 different languages greater accessibility and inclusiveness was achieved in the development of this plan.

Still, traditional methods of paper surveys, disseminated though dozens of service provider partners and area non-profits allowed for the additional inclusion of input from community members with substandard access to and capabilities managing internet connectivity and fluency. This will remain an essential part of diversifying community engagement and outreach efforts to ensure that as the methods of operation modernize, no members are left behind.

Additionally, and in coordination with the development of the HOME-ARP plan Auburn and Lewiston staff reached out to multiple homeless service providers, first responders and educational institutions. This input was incorporated into the development of both plans.

In order to combat the lack of recent, or post-covid data the Community Development staff employed the following two tactics to collect meaningful and informative data regarding the size, demographic makeup and unmet needs of the local population. First, staff has reached out to local homeless service providers, community advocates, educational institutions, veterans' groups, community action programs, state agencies, domestic violence organizations, public housing authorities, and mental healthcare providers. This outreach included an overview of the qualified population as defined by HUD in CPD notice 21-10 as well as potential situations in which these populations may be encountered which they may not have considered in the past. This outreached concluded an appeal to these

organizations to provide quantifiable data on hand or anecdotal narratives which may serve to highlight unmet needs they struggle to respond to.

The second approach was to release a broad community survey focused specifically on the impact of Covid-19 on access to adequate housing and essential services. This survey was circulated in 5 languages. This survey method utilized digital as well as paper surveys which were distributed at key service points within the city including food pantries, youth centers, head start service providers and municipal offices. The result was over 362 households including over 1,000 residents being received.

### **Citizen Participation Outreach**

Sort Or der	Mode of Ou treach	Target of Ou treach	Summary of response/attend ance	Summary of comments re ceived	Summary of co mments not accepted and reasons	URL (If applica ble)
1	Public Comment Period June 1 - June 30	Non- targeted/bro ad community	Solicitation of written feedback directed to CDBG@auburnM aine.gov. Plan posted on website, promoted on SM, city eblast list and advertised in newspaper.			
2	Public Hearing	Non- targeted/bro ad community	Public Hearing at City Council broadcast via Local Cable Access & City Youtube Channel on May 2, 2022	None received		

Sort Or der	Mode of Ou treach	Target of Ou treach	Summary of response/attend ance	Summary of comments re ceived	Summary of co mments not accepted and reasons	URL (If applica ble)
4	Newspaper Ad	Non- targeted/bro ad community	Public Hearing notice published with a link to the Action plan and solicitation of written input directed to cdbg@AuburnMa ine.gov ran in local newspaper			

Sort Or	Mode of Ou	Target of Ou	Summary of	Summary of	Summary of co	URL (If
der	treach	treach	response/attend	comments re	mments not	applica
			ance	ceived	accepted	ble)
					and reasons	
				Numerical		
				data		
				developed		
				though the		
				community		
				survey will be		
				summarized		
				within the		
				GAP analysis		
				below. A		
				selection of		
				narrative		
				input		
				received		
				during the		
				local survey		
				is included		
				below. This		
				input,		
				sourced from		
				over 1,000		
				households		
				across two		
				surveys, was		
				key to filling		
				data gaps		
				caused by		
				the Covid-19		
				pandemic		
				and		
				demonstrate		
				s the		
				changed		
				landscape		
				residents and		
				service		
				providers		
				need to		
			Annual Action Pla			33
			2022	adapt to in		
OMB Contro	l No: 2506-0117 (exp	. 09/30/2021)		order to		
				better		
				address the		

Sort Or der	Mode of Ou treach	Target of Ou treach	Summary of response/attend ance	Summary of comments re ceived	Summary of co mments not accepted and reasons	URL (If applica ble)
6	Printed Survey	Minorities  Non-English Speaking - Specify other language: Swahili, Portuguese, Somali & French  Non- targeted/bro ad community  Residents of Public and Assisted Housing	Printed Survey distributed at Food Pantries, educational centers, public housing facilities and municipal offices. CDBG/HOME Community Survey soliciting input on housing, service and Covid-19 impacts on residents.			

Sort Or der	Mode of Ou treach	Target of Ou treach	Summary of response/attend ance	Summary of comments re ceived	Summary of co mments not accepted and reasons	URL (If applica ble)
7	Public Meeting	Non-targeted/bro ad community	18 residence attended New Auburn Neighborhood watch listening session.			35
OMB Contro	ol No: 2506-0117 (exp	. 09/30/2021)	2022	increased pan- handling.		

Sort Or der	Mode of Ou treach	Target of Ou treach	Summary of response/attend ance	Summary of comments re ceived	Summary of co mments not accepted and reasons	URL (If applica ble)
8	Public Meeting	Local Landlord Association	Staff presented to the Lewiston/Auburn Landlord association on January 25th.	Landlords need more funds available for unit rehabilitation . Concerns regarding the Fair Market Rent caps given prevailing rental rates. Good experiences with section 8 voucher programs relocation expenses during rehab prevents projects from starting.		

Table 4 – Citizen Participation Outreach

## **Expected Resources**

# AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

### Introduction

Program allocations for both Auburn and Lewiston. These yearly allocations are supplemented by their respective program income derived from current loan principal paybacks expected within the program year and unspent funds carried over from prior years. Allocations are presented as rehab or public service grants whose expenditures fell short of budget expectations. Within this Action Plan these funds are being allocated to Funding for the Community Development Program is derived from Community Development Block Grant and HOME Investment Partnerships unspent funds are the result of previous year projects which may have been canceled as well as balances of funds initially set aside for TBRA, expected to be indicated on our FY22 award letter from HUD and internal reports designating available program income and available. Prior included. Unspent funds from the HOME program include program years 2015, 2016, 2017, 2018, 2019, 2020 and 2021 are included. These year resources include unspent funds from both CDBG and HOME funds. Unspent CDBG funds from program year 2019, 2020 and 2021 are new projects as indicated and within guidelines established by HUD.

## **Anticipated Resources**

Program	Source	Uses of Funds	Expe	cted Amoun	Expected Amount Available Year 1	ar 1	Expected	Narrative Description
	of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
CDBG	public -	Acquisition						Expected amount available for the
	federal	Admin and						remainder of the Con Plan consists of
		Planning						the next two year annual allocations
		Economic						combined with the expected program
		Development						income to be received during this
		Housing						period.
		Public						
		Improvements						
		Public Services	539,980	132,000	889,247	1,561,227	889,247   1,561,227   1,387,716	

Program	Source	Uses of Funds	Expe	cted Amoun	Expected Amount Available Year 1	ar 1	Expected	Narrative Description
	of Funds		Annual	Program	Prior Year	Total:	Amount	
			Allocation:	Income:	Resources:	\$	Available	
			❖	φ.	❖		Remainder	
							of ConPlan	
HOME	public -	Acquisition						Expected amount available for the
	federal	Homebuyer						remainder of the Con Plan consists of
		assistance						the next two year annual allocations
		Homeowner						combined with the expected program
		rehab						income to be received during this
		Multifamily rental						period.
		new construction						
		Multifamily rental						
		rehab						
		New construction						
		for ownership						
		TBRA	514,791	26,000	56,000   1,642,343   2,213,134   1,051,500	2,213,134	1,051,500	

Table 2 - Expected Resources - Priority Table

# Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

This workplan has taken a proactive approach to engaging with 3rd party community service providers. In an attempt to eliminate duplication of services, and increase the impact of each federal dollar, new programmatic partnerships are being crafted which will improve the community impact and public services offered within Auburn, creating a new level of accountability for program impact monitoring.

which require owner contributions. The addition of the Lead Hazard Reduction program will also utilize a portion of CDBG funds to cover match requirements for income qualifying owners. These funds effectively leverage private and state funded programs. Investor-owned properties Community Development funds which leverage additional resources are primarily the public service activities and multi-unit rehab projects require a 25% match. Housing programs which target owner-occupied low-income populations have no match requirements.

development projects planned and in construction. The city of Auburn is working on new unit development on a city owned property located on Fern St. The City of Lewiston is developing a project for the Choice Neighborhood development which will leverage private capital contribution. Federal HOME funds will leverage private resources primarily through rental development projects. Auburn and Lewiston each have a rental These funds will be added to the previous year match carry forward to satisfy the requirement.

### 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 of Auburn is working with a to-be-determined developer to utilize 2 lots of publicly owned property for the development of multi-unit housing within the current project year. Additionally, Auburn's Economic Development Office has multiple city-owned properties currently under contract to sell to private commercial developers.

### Discussion

Funding from prior year resources is notable within this budget, yet these numbers are not included in the amount expected for the remainder of the Con Plan. This number is the sum of new allocations and Program income for the next 2 program years.

If there is a reduction in the annual allocation from HUD or a shortfall in expected program income an equally proportionate reduction will be made to the budget. These reductions will come from the Affordable Housing budget.

# **Annual Goals and Objectives**

# AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

# **Goals Summary Information**

Sort	Goal Name	Start	End	Category	Geographic	Needs Addressed	Funding	Goal Outcome Indicator
1	Provide Safe and	2020	2024	Affordable	5	Provide Safe and	CDBG:	Rental units constructed: 5
	Affordable Housing			Housing		Affordable Housing	\$608,055	Household Housing Unit
				Public Housing			HOME:	Rental units rehabilitated: 25
				Homeless			\$654,043	Household Housing Unit
				Non-Homeless				Homeowner Housing Added: 3
				Special Needs				Household Housing Unit
								Homeowner Housing
								Rehabilitated: 10 Household
								Housing Unit
								Tenant-based rental assistance /
								Rapid Rehousing: 30 Households
								Assisted
2	Promote Economic	2020	2024	Non-Housing		Promote Economic	CDBG:	Businesses assisted: 10 Businesses
	Opportunities			Community		Opportunities	\$50,000	Assisted
				Development			HOME: \$0	
က	Provide Essential	2020	2024	Homeless		Provide Essential	CDBG:	Public service activities other than
	Services			Non-Homeless		Services	\$100,000	\$100,000 Low/Moderate Income Housing
				Special Needs			HOME: \$0	Benefit: 500 Persons Assisted

Sort	Goal Name	Start	End	Category	Geographic	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year		Area			
4	Improve	2020	2024	2020 2024 Non-Housing		Improve Public	CDBG:	CDBG:   Public Facility or Infrastructure
	Infrastructure and			Community		Infrastructure and	\$660,000	\$660,000   Activities other than
	reduce blight			Development		remove blight	HOME: \$0	HOME: \$0   Low/Moderate Income Housing
								Benefit: 1000 Persons Assisted

Table 3 – Goals Summary

### **Goal Descriptions**

П	Goal Name	Provide Safe and Affordable Housing
	Goal Description	Rental units rehabilitated: 25 Household Housing Unit
		Homeowner Housing Rehabilitated: 10 Household Housing Unit
		Tenant-based rental assistance / Rapid Rehousing: 30 Households Assisted
2	Goal Name	Promote Economic Opportunities
	Goal Description	Businesses assisted: 10 Businesses Assisted
3	Goal Name	Provide Essential Services
	Goal Description	Public service activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted
4	Goal Name	Improve Infrastructure and reduce blight
	Goal Description	Public service activities other than Low/Moderate Income Housing Benefit: 1000 Persons Assisted

### AP-35 Projects - 91.420, 91.220(d)

### Introduction

The following tables list the activities and programs which will be supported using HUD program funds during the 2022-23 program year. The objectives are to:

- 1. Provide Safe and Affordable Housing
- 2. Improve Public Infrastructure and Eliminate Blight
- 3. Promote Economic Opportunities
- 4. Provide Essential Services

The difference between the totals in the AP-35 & the AP-20 are due to administrative expenses.

#	Project Name
1	2022 Housing Rehab
2	2022 Housing Construction
3	2022 TBRA
4	2022 Homebuyer Assistance
5	2022 Economic Development
6	2022 Public Service
7	2022 Public Improvements
8	2022 Administration
9	2022 Lewiston Admin
10	2022 Lewiston Security Deposits
11	2022 Lewiston HOME Construction

Table 4 - Project Information

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

Allocation priorities for Auburn focus on improving the quality and safety of existing housing stock as directed by the city strategic plan. Increased attention is being given to seniors and households with children who are facing food insecurity. Most Public Services are being provided directly by city staff with allocations being based on historic service delivery and impact reports.

Lewiston priorities for HOME funds are based on the need to increase affordable housing units.

Obstacles for addressing underserved needs are focused on food insecurity and homelessness. These conditions are being addressed by both this annual action plan and the HOME-ARP plan to be released.

# AP-38 Project Summary

**Project Summary Information** 

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1	Project Name	2022 Housing Rehab
	Target Area	
	Goals Supported	Provide Safe and Affordable Housing
	Needs Addressed	Provide Safe and Affordable Housing
	Funding	CDBG: \$618,054 HOME: \$140,299
	Description	Rehabilitation of existing single and multi units.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Anticipated Outcomes: 25 Rental Units Rehabilitated, 10 Homeowner Units Rehabilitated. Occupants will be qualified low-to-moderate income households if critical health and safety concerns identified in the residential unit including lead hazards or other code violations.
	Location Description	Within Auburn.
	Planned Activities	\$500,000 in Critical Repair programs for addressing essential housing repairs and Code Violations.  \$150,000 in Grants provided to Low-to-moderate income residents enrolled within the Lead Hazard Control Program.  \$98,353 in funding for additional Lead testing, Rehab and program
2	Dunio et Nove	delivery services.
	Project Name	2022 Housing Construction
	Target Area Goals Supported	Provide Safe and Affordable Housing
	Needs Addressed	Provide Safe and Affordable Housing
	Funding	HOME: \$1,000,000
	Description	Creation of new residential housing units.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Anticipated Outcomes: 1 Rental Unit Created, 3 Homeowner Housing Units Created on city owned property located on Fern St. Additional planning for subsequent rental unit development is to begin with CHDO or developer on TBD projects.
	Location Description	Within Auburn.

	ı	
	Planned Activities	Creation of new 4-unit facility on city owned property on Fern St. This will entail 3 unit, owner-occupied co-op housing with 1 rental unit.
		Additional projects are being identified with certified Community Housing Development Organization and/or private developers.
3	Project Name	2022 TBRA
	Target Area	
	Goals Supported	Provide Safe and Affordable Housing
	Needs Addressed	Provide Safe and Affordable Housing
	Funding	HOME: \$25,000
	Description	Tenant-based Rental Assistance in the form of Security Deposits for qualified Low-to-moderate income households.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Anticipated Outcomes: 20 Tenant-households provided Security Deposits
	Location Description	Within Auburn.
	Planned Activities	Providing security deposits for qualified low-to-moderate income
		households.
4	Project Name	households.  2022 Homebuyer Assistance
4	Project Name Target Area	
4		
4	Target Area	2022 Homebuyer Assistance
4	Target Area Goals Supported	2022 Homebuyer Assistance  Provide Safe and Affordable Housing
4	Target Area Goals Supported Needs Addressed	2022 Homebuyer Assistance  Provide Safe and Affordable Housing  Provide Safe and Affordable Housing
4	Target Area Goals Supported Needs Addressed Funding	2022 Homebuyer Assistance  Provide Safe and Affordable Housing  Provide Safe and Affordable Housing  HOME: \$205,000  Down payment assistance for qualified low-to-moderate income
4	Target Area Goals Supported Needs Addressed Funding Description	2022 Homebuyer Assistance  Provide Safe and Affordable Housing  Provide Safe and Affordable Housing  HOME: \$205,000  Down payment assistance for qualified low-to-moderate income residents.

	Planned Activities	Providing first-time homebuyer resources including education and down payment assistance for qualified low-to-moderate income households.
5	Project Name	2022 Economic Development
	Target Area	
	Goals Supported	Promote Economic Opportunities
	Needs Addressed	Promote Economic Opportunities
	Funding	CDBG: \$50,000
	Description	Business Loans will be provided to businesses city wide, with a focus on promoting entrepreneurship through the development of the Auburn Incubator Kitchen & Learning Center, a facility located at Pettengill road. This programming is supplemented by funds previously approved within the CDBG-CV budget.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Anticipated Outcomes: 10 Business Loans to qualified low-to-moderate income business owners
	Location Description	Within Auburn.
	Planned Activities	Providing working capital micro-loans to qualified low-to-moderate income entrepreneurs.
6	Project Name	2022 Public Service
	Target Area	
	Goals Supported	Provide Essential Services
	Needs Addressed	Provide Essential Services
	Funding	CDBG: \$100,000
	Description	Public Service funds will be used to provide Senior Services (05A), Youth Services (05D), Battered and abused Spouses (05G) and Other (05Z) which is reserved to support the City's community gardens and food security programs.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Anticipated Outcomes: 500 qualified lot-to-moderate income Persons Assisted

<b>Location Description</b>	Within Auburn.
Planned Activities	\$62,000 of the Public Service Funds will be used to service the Grab-n-Go program operated out of the PAL Center. This food pantry and delivery service has assisted low-to-moderate income residents have reliable access to essential foods throughout the pandemic. This program currently supplies food from its Union St neighborhood location as well as offering delivery services to LMI and Senior living facilities including Roak Block, Barker Mills and Esplanade which are operated by the Auburn Housing Authority. Additional funding provided within this Action Plan will sustain the current 350 residents relying on regular food deliveries as well as allow the program to expand its capacity to another 80 residential units located within the Lake Auburn Town house facilities, another Auburn Housing operated residential facility. As part of these services Recreation/PAL center staff will be increasing support and coordination with the existing Community Garden programs.
	Additional \$20,000 funding support for summer recreation scholarships will be provided to not only allow for equitable access to experiential opportunities to LMI youth, but also serves as structured childcare for working parents during the summer months. This compound benefit has proven to provide the broadest demographically available services within the city's historic public service funding. Expanding on the positive, proven Public Services offered directly by the city of Auburn will increase the city's response to the prevailing nutritional and economic needs of its most historically and economically disadvantaged residents and neighborhoods.
	Lastly, Public Service financing of \$18,000 will continue for Safe Voices, who have effectively and proactively provided additional services and housing for domestic abuse victims and families throughout the pandemic. This funding decision is supported by the public service priorities established by the Citizen Advisory Committee.
Project Name	2022 Public Improvements
Target Area	
Goals Supported	Improve Infrastructure and reduce blight
Needs Addressed	Improve Public Infrastructure and remove blight
Funding	CDBG: \$660,000

	Description	Funds will be used to address blight remediation, continue the Neighborhood Challenge grant program as well as continue the development of publicly owned infrastructure and amenities within targeted neighborhoods. Additional focus will be placed on addressing distressed buildings and code violations.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Anticipated Outcomes: 1,000 Persons Assisted through improved public infrastructure and the removal of blight and heath hazards.
	Location Description	Within 3 qualified low-to-moderate income census tracts (New Auburn, Downtown & Union St).
	Planned Activities	Funds will be used to address health and blight conditions including lead based paint on publicly owned buildings. Additional funds will be earmarked for the Neighborhood Challenge grant program that creates and improved public amenities within 3 qualified low-to-moderate income census tracts.  \$500,000 in Public Infrastructure projects
		\$35,000 in Neighborhood Challenge Grants
		\$125,000 in Spot/Blight remediation projects
8	Project Name	2022 Administration
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$133,173 HOME: \$179,955
	Description	Personnel and administrative costs for delivering activities.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	

	Planned Activities	Administrative expenses for planning and delivering program activities. This includes 2 proposed planning grants, one HOME funded for Renta study and one CDBG funded Economic Development planning study.		
9	Project Name	2022 Lewiston Admin		
	Target Area			
	Goals Supported			
	Needs Addressed			
	Funding	HOME: \$33,838		
	Description	Administration Expenses for Lewiston HOME program.		
	Target Date			
	Estimate the number and type of families that will benefit from the proposed activities			
	<b>Location Description</b>			
	Planned Activities	Administrative expenses for Lewiston HOME program.		
10	Project Name	2022 Lewiston Security Deposits		
	Target Area			
	Goals Supported	Provide Safe and Affordable Housing		
	Needs Addressed	Provide Safe and Affordable Housing		
	Funding	HOME: \$15,000		
	Description	Tenant-based Rental Assistance in the form of Security Deposits.		
	Target Date	6/30/2023		
	Estimate the number and type of families that will benefit from the proposed activities	Anticipated Outcomes: 10 Tenant-households provided Security Deposits		
	<b>Location Description</b>	Within Lewiston		
	Planned Activities	Providing security deposits for qualified low-to-moderate income households.		
11	Project Name	2022 Lewiston HOME Construction		
	Target Area			

<b>Goals Supported</b>	Provide Safe and Affordable Housing
Needs Addressed	Provide Safe and Affordable Housing
Funding	HOME: \$614,042
Description	Construction of new rental units.
Target Date 6/30/2023	
Estimate the number and type of families that will benefit from the proposed activities	<b>Anticipated Outcomes:</b> 4 Rental Units Created. Additional planning for subsequent rental unit development is to begin with CHDO or developer on TBD projects.
<b>Location Description</b>	Within Lewiston
Planned Activities	Creation of new rental units within the Choice Neighborhood & Gauvreau Place projects.
	Additional projects are being identified with certified Community Housing Development Organization and/or private developers.

### AP-50 Geographic Distribution - 91.420, 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

In Auburn, priority will be given to the Downtown (Census Tract # 101), The Union St Neighborhood (Census Tract # 103), and the New Auburn Area (Census Tract #105).

### **Geographic Distribution**

Target Area	Percentage of Funds

**Table 5 - Geographic Distribution** 

### Rationale for the priorities for allocating investments geographically

The 2011-2015 American Community Census identified these 3 census tracts in Auburn where a majority of the households qualify as Low-To-Moderate Income levels. For this reason, these 3 tracts will be a focus of the city's affirmative marketing, outreach and translation services.

### Discussion

Recently compiled GIS heat map data has also highlighted these 3 census tracts containing a majority of the city's homes which are at high risk for containing lead paint hazards. Additional resources for outreach, education and abatement services will be provided to these designated census tracts and funded through the recently acquired Lead Hazard Control & Healthy Homes grant.

### **Affordable Housing**

### AP-55 Affordable Housing - 91.420, 91.220(g)

### Introduction

Annual Action plan targets providing TBRA to 35 homeless or near-homeless households in Auburn and Lewiston. Auburn's target for rehab of rental units is 25 units and rehab of 10 owner occupied homes. This will be accomplished by leveraging the Lead Hazard Control and Healthy Homes grant.

Auburn plans to develop 3 new owner occupied units and 1 rental unit at a single location on city owned property. Additional new unit development plans are currently underway and expect to have more HOME funded units to come online within subsequent Action Plans. Lewiston plans to develop 4 new HOME funded units.

Units funded with CDBG dollars must follow the city's Affordable Rent Standard. The definition of an affordable unit under this plan will be qualified as one that does not exceed HUD published Fair Market Rents (FMRs) for the current year. A unit is determined to fall within the FMR of a specific area by adding the contracted rent and the applicable utility allowance for the unit. For the purposes of CDBG funded projects, the sum of both numbers cannot exceed the FMR of a unit based on bedroom size as published by HUD annually. If the local housing authorities have adopted and been granted a community wide exception, then the affordable rent standard may increase to no more than 120% of the FMR for the local jurisdiction.

One Year Goals for the Number of Households to be Supported		
Homeless	0	
Non-Homeless	8	
Special-Needs	0	
Total	8	

Table 6 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Sup	r Goals for the Number of Households Supported Through	
Rental Assistance	0	
The Production of New Units	8	
Rehab of Existing Units	0	
Acquisition of Existing Units	0	
Total	8	

Table 7 - One Year Goals for Affordable Housing by Support Type

### Discussion

The total one-year goals established above are for HOME funded production units only, and not indicative of the total Action Plan anticipated impacts as demonstrated more comprehensively on the AP-35.

Due in part to the Covid-19 pandemic, inflated construction costs and lack of contractors the new-unit development scheduled in the previous year were not carried out for projects within both cities. These plans will be carried over to this current action plan. Additional funding, as provided by the HOME-ARP allocation will add to the impact of services for rental assistance as well as the related services required to help families struggling with challenges other than scarcity of affordable units.

Additional steps will be made within this Action Plan to address a lack of racial equity in affordable housing programming as outlined referenced the city's 5-year Comprehensive Plan. This will be achieved by providing more direct outreach to residents within the Union St, Downtown and New Auburn census tracts. This outreach will be aided with new translated materials. These census tracts are qualified as being comprised of 51% or more low-to-moderate income households, as well as being the highest concentration of residential units having been built prior to 1978. Pre-78 homes have a higher potential for containing Lead-based paint hazards which cause negative health effects in children.

### **AP-60 Public Housing - 91.420, 91.220(h)**

### Introduction

Auburn and Lewiston have added multiple large affordable housing projects in the past few years. According to statistics maintained by Maine Housing Authority 243 new affordable housing units have been created with MSHA funding (including Auburn & Lewiston Consortium funds) between 2019 and 2022. These buildings offer modern affordable amenities to public housing residents. Auburn Housing Authority has been transitioning to a voucher-based system allowing more aid to residents using privately owned units.

### Actions planned during the next year to address the needs to public housing

Auburn is partnering with Auburn Housing Authority and a to-be-determined 3rd party nonprofit to develop a co-op owned building on Fern St. Auburn Housing Authority is continuing its conversion into a voucher-based system which is intended to increase capacity. The city has a notable amount of previous year HOME funds to invest in new unit developments.

The city of Auburn has substantial market rate developments planned and/or permitted for construction within the next year. Some of these projects have faced local opposition at the planning board level. Three projects within three very different zones within the city have stirred controversy due to isolated neighborhood opposition but the city is still committed to develop new housing units to help alleviate the identified housing shortage and high rental rates that have been plaguing residents. The existence of NIMBYism and discrimination by communities and neighbors, as highlighted in MSHA's Analysis to the Impediments of Fair Housing Choice published in 2019, is not new but the Auburn administration and City Council has continued to demonstrate though their actions unified support for the development of new housing units within the city.

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

Auburn works with the Auburn Housing Authority and Community Concepts Finance Corporation to assist in the development of new homeowners through its homeownership program and related Homebuyer Education programs. Auburn has incorporated self-sustainability programs into its programs which provide free financial coaching and educational experiences as provided by a HUD certified housing or financial management counselor.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

N/A

### Discussion

Both Lewiston and Auburn are focusing on supporting resident owned multi-unit facilities in order to promote home ownership. The city of Auburn as created an online fair housing resource center after Covid-19 forced the cancelation of the traditional joint landlord and tenant summit. This resource center provides opportunities for tenant's access new tools to address tenant topics of interest as well as other resources that assist tenants become homeowners. This online resource center can be found at https://www.auburnmaine.gov/pages/neighborhood/housing-summit

### AP-65 Homeless and Other Special Needs Activities - 91.420, 91.220(i) Introduction

Auburn and Lewiston's homeless needs have historically been addressed through the Maine Balance of State Continuum of Care. Both Cities participate and sponsor the Lewiston-Auburn Alliance for Services to the Homeless (LAASH), a group of local homeless providers who gather monthly to address the gaps in services to the areas homeless. Additionally, the city of Auburn has integrated the Public Health & General Assistance Departments within the Business & Community Development Department. This realignment has led to direct integration of these overlapping service plans. The consultation process undertaken for this Annual Action Plan as well as the HOME-ARP plan has been guided by assistance from the Public Health Manager. Data regarding homeless and at-risk qualified populations has resulted in the development of a service-based plan under HOME-ARP which would see the creation and additional budgetary resources necessary to address the needs of this population. This plan has been developed in partnership with the HUB Coordinator located within Lewiston Housing Authority whose role is to better assess and coordinate homeless counts and resource development and delivery.

### Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

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

This annual Action Plan has been developed in coordination with the Consortium HOME-ARP plan. The consultation processes engaged in the development of both of these plans is further described within the HOME-ARP plan but will be summarized below.

Prior to the development of the Home-ARP and the Auburn-Lewiston HOME Consortium Action Plan a comprehensive community needs survey was circulated in 5 languages. This survey method utilized digital as well as paper surveys which were distributed at key service points within the city including food pantries, youth centers, head start service providers and municipal offices. The result was over 362 households including over 1,000 residents being received. This information, along with consultation efforts with area service provider partners helped craft the plan as presented.

The consultation process entailed direct correspondence with dozens of area service providers. By educating them on the specifics of the qualified population as defined by HUD in CPD notice 21-10 this outreached further solicited quantifiable or anecdotal narratives which may serve to highlight unmet needs they regularly encounter. These letters included responses from the Chief of the Auburn Police Department, the Chief of the Auburn Fire Department, The Mckinney-Vento Liaison of the Auburn School Department, the Assistant Director of Auburn Adult Education, as well as direct consultation with the developers of the Lewiston-Auburn Transitional Resource Center.

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

The Auburn-Lewiston Home Consortium includes the entirety of both cities. Much of the data provided at the state level is by Androscoggin County or as the Lewiston-Auburn Metropolitan Statistical Area (which includes 12 surrounding municipalities). Both Auburn & Lewiston serve as a regional service HUB for the area meaning that even though HOME-ARP funds are designated for residents of the two cities, the needs of these cities is impacted by the spillover, or centralization of needs from the surrounding rural populations.

For example, data collected form the 2 emergency shelters operated at the Lewiston Ramada Inn or the Lewiston Armory clearly demonstrates this catch-basin effect. The combined totals of the two emergency shelters (whose numbers are not included in MSHA PIT counts) regularly operated at capacity. Of their total 213 individuals sheltered 60% claimed Lewiston as their residence, 20% claimed Auburn with the remaining 20% coming from outside of the consortium jurisdiction. The city of Auburn is working in consultation with the Lewiston-Auburn Transitional Recourse Center team and the regional HUB Coordinator on an expansion of services under the HOME-ARP program to better address the needs of this population.

Additionally, the city of Auburn has recently taken in 17 additional refugee families of various origins. These needs are being addressed through the city General Assistance office with wrap around services and coordination being provided by the city Public Health manager. This coordination includes private charities, educational facilities, and local hotel operators.

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

The City of Auburn is developing a plan for implementing new services to be funded with Department of Housing & Urban Development (HUD) Home-ARP funds. These services are focused on responding to the needs of community members experiencing homelessness, who are at risk of homelessness or who are fleeing domestic/dating violence, sexual assault, or human trafficking. The definition of a Qualified Population (QP) to be assisted with these funds if further defined by HUD in their CDP Notice 21-10.

These services are being developed in response to quantifiable data collected by the Auburn Lewiston HOME Consortium in partnership with multiple city department, service providers and non-profits. This plan contains 2 key elements. The first is to provide funding for qualified services to include both **Tenant Based Rental Assistance (TBRA)**, which includes rental assistance, security deposits and utility deposits for qualified households, as well as **Direct Support Services (DSS)** to include McKinney-Vento Support

Services and Homelessness Prevention services as further outlined in CPD Notice 21-10.

The second key element will be one direct support service providers, housed in the Auburn Community Development Office, which will work proactively with the Public Health office and across various city departments including the Auburn School Department, Police Department and General Assistance Department to provide advocacy and support services to Auburn residents at their time of need.

The Homeless Intervention Specialist (HIS) will work across multiple city departments to build relationships with community members experiencing homelessness or at risk of homelessness to provide advocacy and support services and assist with connecting individuals to housing and support services in partnership with the regional HUB Coordinator. The Specialist will assist with identifying unsheltered homeless or at-risk neighbors through direct outreach with and referrals from the Auburn Police Department, Auburn Fire Department, Auburn School Department, Public Health Manager, and General Assistance Manager as needed. This may include meeting with individuals in encampments, shelters, warming locations, and other locations not meant for human habitation or those recently released from healthcare, mental health or correction facilities. The work schedule will include some evening and weekend hours where the Specialist will assess the needs of the individuals identified and facilitate placement into emergency or short-term housing as needed.

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 General Assistance offices of both cities work proactively to prevent LMI families from becoming homeless. These efforts are not just based on the use of General Assistance funds but also the addition of wrap-around support services rooted in their proactive community roles. Similarly, the Auburn Public Health office continues to work with residential institutions to match needs with readily dwindling community housing and support resources. The Community Development Office is adding a new, Homelessness Intervention Specialist position with an additional Mckinney-Vento style budget from the HOME-ARP allocation to provide additional services and resources to these at-risk qualified populations.

Additionally, the Maine COC has added a new HUB coordinator located at the Lewiston Housing Authority. This position will be the point of coordinated entry into the COC system, allowing the Community Development and Public Health teams to focus their efforts on crisis response and early intervention efforts.

In addition to the current homelessness crisis and the influx of more refugee families into a jurisdiction already coping with a housing shortage is the impending end of the current Emergency Rental Assistance program. This program, which locally administered by Community Concepts Inc, has serviced 1,118 non-duplicated households as of March 2022. With the scheduled closure of the Ramada Inn Emergency Homeless shelter and the end of the ERA program funding set to expire on June 30th, 2022, preparations for a dramatic in housing needs are being developed.

### Discussion

As noted above, Homelessness is not a place-based problem. Many who lack adequate, permeant housing are transitory in nature as they seek out new and ever-changing resources to meet their needs. Because of this, responses cannot be relegated to isolated neighborhoods or cities. The data compiled for this Action Plan reiterates the clear fact that this consortium is a catch-basin for homelessness and special needs for the region as a whole. To address this better assessments of causal events and cooperation between regional service providers is needed. A strong relationship with the State's Continuum of Care and the locally placed HUB Coordinator is necessary to more accurately quantify need and coordinate resources. These efforts will be optimized though a locally focused effort to measure and design systematic responses to the prevailing needs of the community.

### AP-75 Barriers to affordable housing -91.420, 91.220(j) Introduction

Private development of multi-unit housing projects is on the rise across Auburn. Projects which are in the permitting process or already under construction are climbing, as reported by the Auburn Planning & Permitting Department. There are a total of 102 new units in 3 different projects expected to come into service by the end of 2022. Another 423 new units are also in process to be completed by 2023, and 196 seeking approval for 2024. The large, and rapid increase in new unit development, coupled with Auburn Housing Authority's conversion to a voucher-based system will have a notable impact on addressing not just the over-all housing shortage, but will also make much needed headway in the alleviation of the shortage of affordable housing.

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

The City of Auburn has continued its multi-year efforts to implement form-based zoning. This year an ambitious rezoning of the city's core residential area, totaling over 1,687 acres, is still ongoing. Conducted under the guidance of the city's Comprehensive Plan as updated in 2021, these changes to the land use code would allow for an increase density to as high as 16 units per acre. There is currently one new development waiting for these changes to take effect. This project, called Stable Ridge Apartments would construct 60 new units within a 5 building development located next to the Auburn Middle school.

City administration as well as elected leaders have not been seeking traditional governmental approaches to solution development. Instead of developing and implementing large-scale multi-unit construction subsidized by multiple layers of tax incentives, state and federal funds they have promoted a more equitable, and innovative small scale methods. These include the approval of Accessory Dwelling Units within city zoning which not only creates new housing stock, but also offers small-scale sustainable rental income for many more middle- and low-income residents who have an extra quarter-acre to spare. Some of these more innovative approaches have recently been highlighted in an article called "The YIMBYest City in America" (linked below), where the Mayor leans into the recent Not-in-my-back-yard exclusionism the city has faced. This same NIMBYism is also highlighted as an on-going concern within Maine State Housing Authority's 2019 Analysis of Impediments to Fair Housing Choice report.

YIMBY article: The YIMBYest City in America - Discourse (discoursemagazine.com)

MSHA Analysis of Impediments to Fair Housing: 2019-analysis-of-impediments.pdf (mainehousing.org)

### Discussion

These progressive zoning changes, as well as the proposed projects, have stirred substantial community conversations. Dozens of residents have spoken at multiple public hearings or printed letters to the editor in the local paper, both for and against these types of zoning changes and development proposals. Arguments against these developments call into question potential negative effects on the "traditionally single family residence neighborhoods" which would be impacted by these large zoning changes across the city. This type of "Zone Defense" has been reactionary to these proposed developments in nature and speak to the impediments raised by MSHA in their analysis of Impediments to Fair Housing Choice.

Still, the Mayor and city council maintains support for not just the needs for new housing units to relieve what the mayor has referred to as "incremental" solutions to this larger housing crisis. Recent reports on these developments can be seen here: https://www.sunjournal.com/2022/03/27/legal-opinion-could-prompt-delay-in-auburn-rezoning-effort/

### AP-85 Other Actions - 91.420, 91.220(k)

### Introduction

The Action Plan for the city of Auburn and the Auburn-Lewison Consortium is due to be released each year by March in order to provide the required public comment period, be approved and funded by the beginning of the new project year. This process would traditionally allow for the city to release RFPs for Public Service grants based on the approved budget. In March of 2022 HUD released CPD Notice 22-05, which suspended this process and related requirements until the formula-based allocations are published by HUD. These allocations, due to various approval delays at the federal level, were not made available to the city until May 16, 2022. Because of this delay the city will not have enough time to complete the approval process before the beginning of the next project year. In order to avoid any further delays in public service delivery the city of Auburn has chosen to fund internal programs based on the prioritization established by the Citizen Advisory Committee, instead of seeking 3rd party non-profit service providers. These internal programs are experienced service delivery projects dandled in collaboration with Auburn Recreation Department and the PAL Center. One 3rd party organization focused on domestic violence and homeless services was awarded based on historic performance and preferences established by the Citizen Advisory Committee.

The city of Auburn and the Auburn-Lewiston Consortium have undergone substantial redesign and restaffing in order to better meet the prevailing needs of the community. As with any substantial change effort growing pains within program planning and subrecipient funding expectations is expected, and steps have been taken to prepare for and respond to these concerns. Still, it is essential that the federal funds provided to the city to address these ever changing needs and be spent effectively and with the largest impact per dollar possible.

### Actions planned to address obstacles to meeting underserved needs

In a post-covid world the resources and needs of the at-risk community changed dramatically. During this time some types of programming and response systems proved their strength, reliability, and impact. These prevailing needs focused around food insecurity and at-home resources for home-bound or mobility-limited residents. Within this plan the primary allocation of Public Service Funds will be used to service the Grab-n-Go program operated out of the PAL Center. This food pantry and delivery service has assisted low-to-moderate income residents have reliable access to essential foods throughout the pandemic. This program currently supplies food from its Union St neighborhood location as well as offering delivery services to LMI and Senior living facilities including Roak Block, Barker Mills and Esplanade which are operated by the Auburn Housing Authority. Additional funding provided within this Action Plan will sustain the current 350 residents relying on regular food deliveries as well as allow the program to expand its capacity to another 80 residential units located within the Lake Auburn Town house facilities, another Auburn Housing operated residential facility.

Additional funding support for summer recreation scholarships will be provided to not only allow for

equitable access to experiential opportunities to LMI youth, but also serves as structured childcare for working parents during the summer months. This compound benefit has proven to provide the broadest demographically available services within the city's historic public service funding. Expanding on the positive, proven Public Services offered directly by the city of Auburn will increase the city's response to the prevailing nutritional and economic needs of its most historically and economically disadvantaged residents and neighborhoods.

Lastly, Public Service financing will continue for Safe Voices, who have effectively and proactively provided additional services and housing for domestic abuse victims and families throughout the pandemic. This funding decision is supported by the public service priorities established by the Citizen Advisory Committee.

### Actions planned to foster and maintain affordable housing

Primary activities within this Action Plan involve the development of new residential units offered and made affordable for Low-to-moderate income residents. These funds will be provided to Community Housing Development Organizations and private developers in exchange for those assisted units being offered solely to LMI residents at rates that are deemed affordable.

Additional programs will provide access to funding for emergency repairs to residential housing units as well as lead testing and abatement funding dedicated to improving the health and safety of homes with young children.

### Actions planned to reduce lead-based paint hazards

Both cities currently manage their own grants from the Office of Lead Hazard Control with which residential units containing children, or being marketed to families with children, can be tested for lead paint hazards. Where hazards are present, funds will be made available in the form of grants to mitigate and abate the presence of these lead paint hazards. The separate budget and work plan for the Lead Hazard Control grant established a goal of 110 units abated for lead hazards over the next 3 years. Included within this Action Plan are matching CDBG grants for LMI households to further increase the impact of the Lead Hazard Control grant funds.

### Actions planned to reduce the number of poverty-level families

Community Development staff is committed to establishing and maintaining relationships with organizations and institutions which broaden and strengthen the institutional structure. Auburn is increasing its efforts to develop workforce empowerment programming with the local Chamber of commerce, as well as focusing and providing educational opportunities for Section 3 businesses. These are businesses owned or staffed with primarily by Low-to-moderate income residents. These additional empowerment structures provide opportunities to poverty-level families to increase their experience and earnings and are funded in part through the Lead Hazard Control grant.

The city has also established a relationship with Community Concepts Finance Corporation, a certified HUD homeownership and finance counselor, which will provide free financial education sessions to families enrolled in the homebuyer or rehab programs. Leading with education services better prepared LMI residents to understand and prepare for the financial planning necessary to maintain their assets and improve their own financial situations.

### Actions planned to develop institutional structure

The city of Auburn has reorganized its internal structure to better meet the array of prevailing community needs. By integrating the Public Health, General Assistance and Community Development teams there is present a culture of collaboration and joint responding to emergency health, housing and refugee needs which can only be achieved though the removal of inter-department barriers and the establishment of a unified mission of service and crisis response. As new positions are added, such as the Lead Hazard Control team and the Housing Intervention team, service gaps within the department are being filled.

The Auburn-Lewiston Consortium is also in a new phase of development where the Community Development and General Assistance offices from each city are working more directly and collaboratively on planning and response initiatives. This is most prevalent around the development and coordination of responses funded under the HOME-ARP plan, where the shared needs and homelessness crisis's are not easily divisible between the two cities. This inter-city cooperation and data sharing removed duplicative services and increases the efficiency of service delivery and efficacy.

### Actions planned to enhance coordination between public and private housing and social service agencies

The Auburn Community Development Department, the Auburn Housing Authority, the Lewiston-Auburn Alliance for Services to the Homeless, the Lewiston Community Development Department, the Lewiston Housing Authority, Community Concepts, Healthy Androscoggin, and other city departments, and local and regional nonprofit organizations coordinate closely in the planning and delivery of housing services. However, there are not enough resources among all of the partners to meet the identified needs. Waiting lists for services at the housing authorities are long. By leveraging private developers to construct more affordable units and engage with the Section 8 voucher program multiple agencies would be increasing efficiency and ability to better serve the 434 low-to-moderate income residents currently on the Section 8 wait list. By engaging with the new HUB Coordinator through a dedicated Housing Intervention Specialist position within the city these production efforts can be aided with wraparound services necessary to move residents in need through a better organized structure with concrete benchmarks and measurable goals.

The Community Development Department has been involved in a local Green and Healthy Homes initiative in order to better coordinate housing improvements and bring new resources to

the community. The City of Auburn has received a Lead Hazard Control Grant with the assistance of Healthy Androscoggin and other service delivery partners within the community. This project entails substantial integration of multiple health agencies, non-profit service providers and state Center for Disease Control who can more efficiently share information, referrals and response services specifically for children with identified elevated blood-lead levels (eblls).

The city of Auburn is currently working on the development of a new multi-unit housing co-op in partnership with the Auburn Housing Authority. This project will utilize the assistance of additional non-profit technical assistance providers who specialize in co-op development and governance. This new model will not just create new multi-unit rentals but will create democratically governed buildings where residents become homeowners and have access to a greater opportunity to build generational wealth through homeownership.

### Discussion

The last year has provided substantial and dramatic changes locally, nationally and internationally. More prevalent today than in the last 50 years international conflicts and the crumbling of a globalized consumer economy has created new and unexpected challenges to Auburn and Lewiston residents. Grocery prices and fuel are increasing dramatically. Essential foods are becoming scarce given manufacturing and resource acquisition breakdowns on the other side of the world. Lumber prices and construction materials are becoming scarce and largely unaffordable to many. Our community is growing with the addition of new and welcomed members who have been driven from other parts of the world due to famine and conflict. Finally, inflation and un/under employment are making housing and necessary daily resources unattainable for average residents.

The worst part of all of these new and novel trials and tribulations, which we all have grown accustomed to hearing on the daily news, is that it begins to negatively affect our general world-view and essential optimism which we all need to grow, develop and prosper. This is, above all, where we need to focus the majority of our efforts, energies and collaborations. In the face of all these challenges the most important aspect of interdepartmental, institutional, and interpersonal development will be to not lose sight of this key element.

### **Program Specific Requirements**

### AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)

### Introduction

### Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(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.

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:	0
Other CDBG Requirements	
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.	75.00%

### HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

Auburn /Lewiston will not utilize other forms of investment beyond those in section 92.205

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The Auburn/Lewiston Consortium will use the Recapture method to recover HOME funds from projects that have not met the minimum required affordability periods. The proceeds from the repayment of the HOME Program assistance to the original first-time homebuyer will be utilized to assist other HOME Program eligible first-time homebuyers to obtain a home within the geographic area providing the property will be their principal residence.

To ensure that the Auburn Lewiston Consortium recovers all or a portion of the HOME Program funds from a homeowner if the housing is sold, transferred or foreclosed upon within the minimum federally-required affordability period, the following Recapture provisions will be made an express covenant of the borrower applicable to the loan:

If the mortgaged property is sold, refinanced, conveyed, assigned, leased or otherwise transferred or if a senior lender forecloses on any senior mortgage prior to the end of the minimum federally required affordability period as defined by 24CFR 92.254(a)(4), the Home Program loan assistance must be repaid to the City of Auburn on a net proceeds' basis according to the following mathematical formula:

Net Proceeds = (sales price minus municipal liens minus principal owed to senior lenders minus selling costs);

Homeowner Investment = (down payment plus principal paid on first mortgage, and any verifiable capital improvement investment made from date of purchase);

A/L Investment = (HOME Program Loan(s) assistance);

Total Investment = (homeowner investment plus City's investment)

Amount of Net Proceeds to be returned to the City = City's investment x net proceeds

Total investment

In the event of resale of a property where there is no direct subsidy to the buyer, the

Auburn/Lewiston Consortium employs a Resale Provision to preserve the full term of affordability and ensure the housing is retained for occupancy by low-income families. Specifically, the Resale Provision requires that if the owner sells, conveys or otherwise transfers his interest in the premises prior to expiration of the affordability period, such sale, conveyance, or transfer shall only be to an eligible, low-income purchaser. Other restrictions concerning notice of sale, maximum resale price and marketing of affordable unit(s) apply and are fully detailed in the Auburn/Lewiston's Resale Provision.

Auburn/Lewiston Consortium will not use the resale draft guidelines without consultation and approval from HUD.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

Homebuyer and Homeowner Rehabilitation projects will be subject to recapture provisions of the HOME Program. The property must be occupied as a principal residence for the minimum periods of 5 years if HOME assistance is less than\$15,000, 10 years if HOME assistance is between \$15,000 and \$40,000, and 15 years if HOME assistance is over \$40,000. The recapture period shall commence when the building acquisition and/or rehabilitation are complete and a project completion certification has been issued for rehabilitation.

Transfer of Title. The City shall collect the net proceeds from the sale of the property up to the outstanding balance of the HOME assistance when the HOME Borrower relinquishes the property voluntarily or due to a foreclosure, bankruptcy, appointment of a receiver or liquidation, or assignment for the benefit of the HOME Borrower's creditors, or a financial hardship resulting in a short sale. In the event that the net proceeds are insufficient to repay the HOME loan(s), the City will then forgive part or all of the HOME loans(s).

Auburn will not use a Resale provision unless preapproved by HUD.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

Home funds will not be used to refinance existing debt.

### **Attachments**

### **Grantee Unique Appendices**



### City of Auburn, Maine

Business & Community Development Glen Holmes, Director 60 Court Street | Auburn, Maine 04210 www.auburnmaine.gov | 207.333.6601

Citizen Participation Plan 2020-2024 Adopted , 2022

The U.S. Department of Housing and Urban Development (HUD) has consolidated the planning, application, reporting and citizen participation processes of formula grant programs: Community Development Block Grants (CDBG), & Home Investment Partnerships (HOME). The Consolidated Plan is designed to help states and local jurisdictions to assess their affordable housing and community development needs and market conditions, and to make data-driven, place-based investment decisions. The consolidated planning process serves as the framework for a community-wide dialogue to identify housing and community development priorities that align and focus funding from the formula block grant programs.

The city of Auburn (City) encourages citizens, especially those earning low and moderate incomes, to participate in the development of the City's Consolidated Housing and Community Development Plan ("Consolidated Plan"). This Citizen Participation Plan outlines the responsibilities of the City for obtaining citizen participation in the process of preparing, amending, and updating the Five-Year Consolidated Plan, the Annual Action Plan, and the Consolidated Annual Performance Evaluation Report (CAPER).

### Citizen Participation Statutory Requirements

Plan/Report	Frequency	Due Date	Comment Period	Public Hearings
Consolidated Plan	Every 5 years	May 15*	30 days	2
Annual Action Plan	Every Year	May 15*	30 days	2
Amendments to Consolidated Plan Annual Action Plan	As needed	6	30 days	1
Consolidated Annual Performance Evaluation Report (CAPER)	Every year	Sept. 30	15 days	1

\*Unless otherwise extended by HUD CPD Notice

### Timeline of Annual Tasks, Submissions & Approvals

February	Public Hearing to solicit consolidated/Action plan input Complete Department Program Budget	
March 1st	Revisit Needs assessment and prioritizations Draft Consolidated/ Action Plan	
April 1st	Publish Consolidated/ Action Plan Public Notice for 30-day Comment Period	
1 <sup>st</sup> Council Meeting in May	Public Hearing Approval of Budget & Action Plan	
May 15th	Submission of:  Consolidated/ Action Plan Summary of Consultations Summary of Citizen Participation/ Comments Certifications & 424s	
July 1st	Beginning of Fiscal Year	
August 1st	Close out Previous year activities/ Budgets	
September 15	Publish CAPER Public Hearing regarding CAPER	
September 30th	Submit CAPER to HUD	
December 1st	Release annual citizen participation survey Solicit unmet needs statements from area service providers	

### THE CONSOLIDATED PLAN AND THE ANNUAL ACTION PLAN

The Consolidated Plan examines the current housing situation, explores the housing and community development needs of the City, and sets priorities for spending HUD grant funds. The Annual Action Plan represents activities for years 2-5 of the Consolidated Plan. The City encourages inter-local government, public and private agency, and citizen participation in collaboratively identifying housing and community development needs. To provide varied opportunities for participation in the planning and preparation of the Consolidated Plan, the City will undertake the following actions:

### Consultation

Prior to the development of the draft Consolidated Plan, the City will solicit information about housing and community development needs. This solicitation may take the form of one or more of the following:

- Consultation with local public agencies which assist low-income persons and areas, including state and federal agencies, other local governments and regional councils of government.
- Consultation with private agencies, including public and private housing developers, local not-for-profit service providers, local public housing authorities, homeless service providers, not for-profit housing developers, community action agencies, social service agencies and advocates.

- Information collection at statewide affordable housing and homeless conferences, with established entities such as the Statewide Homeless Council and the Continuums of Care, MaineHousing and with professional associations.
- 4. Public Hearing to solicit input from the community.
- Sharing of local data and plans with Auburn Housing Authority to be incorporated in the AHA public hearing process.

### Participation of Citizens

The City encourages citizens to participate in the development of the Consolidated Plan, Annual Action plans and all annual performance evaluations and reports. The City will take whatever actions are appropriate to encourage the participation of all residents, including minorities, non-English speaking persons, persons with disabilities, low- and moderate income persons, particularly those persons living in areas designated by the City as a revitalization area, or in a slum and blight area where CDBG funds are proposed to be used, as well as residents of predominantly low- and moderate income neighborhoods as defined by the most recent HUD census data. This includes translation services upon request for any written plans or notices as well as the increased use of the development of new, quantitative ways to increase and broaden public participation beyond the attendance of Public Hearings as required by 24 CFR 91.105 A-2 (iv).

Citizen participation will be accomplished through the following means:

### Citizen Survey

- An online survey of housing needs and service priorities will be provided via the City's websites. The availability of the online survey will be communicated through email and social media. Partner organizations will be encouraged to notify low-income clients of its availability.
- A paper survey corresponding to the online survey will be provided locally through jurisdiction-wide service providers. These surveys will be translated into a minimum of three additional languages to include French, Portuguese & Somali.

### 2. Public Hearings/Forums

- Public hearings will be scheduled at times and locations that are convenient to potential and actual beneficiaries.
- Sites will accommodate persons with mobility impairments by being held in locations which meet ADA requirements, and special communication accommodations will be arranged if requested prior to the hearing date.

To the greatest extent practicable, the City may employ electronic means of communication and consultation, to include e-committees, online discussion forums and blogs, videoconferencing, online surveys, or similar methods. Upon request the City will provide Technical Assistance to groups representative of low- to moderate income communities who need assistance in developing proposals for funding assistance under any program included within the Consolidated Plan.

### Public Notice

Reasonable notice will be given to announce the availability of the draft Consolidated Plan, Annual Action Plan and Consolidated Annual Performance and Evaluation Report. Availability of the drafts Plan or Annual Action Plan will be announced on the City's website and Social media. To encourage citizen comment and attendance at public hearings/forums, notices will be emailed via City's mass email list as well as posted in city facilities including the local Housing Authority, the city Library, Senior Center and other service organizations which predominantly serve Lowand moderate-income residents.

These notices will include links to the draft plans and reports, contain information on how to access translation services and notify residents how to receive paper copies of the full proposals. The draft plans published will include the following as required by 24 CFR 91.105 (b)(1):

- HUD-provided data available to the public as cross-referenced to the data on HUD's Website
- the amount of assistance the local government expects to receive (including grant funds and program income);
- · the range of activities that may be undertaken;
- · the estimated amount of funding that will benefit persons of low- and moderate-income;
- the local government's plans to minimize displacement of persons and to assist any
  persons displaced, specifying the types and levels of assistance the local government will
  make available (or require others to make available) to persons displaced, even if the
  local government expects no displacement to occur; and

### Public Hearings

Public hearings will be held before the submission of the final Consolidated & Annual Action Plan. This will be part of the 30-day public comment period. The purpose of this public hearing will be to gather citizen input on the proposed plans prior to submission.

Citizens will be notified of the public hearings at least two weeks before they are held. Public hearings will be announced in at least one Maine newspaper, by email, and on the City websites.

### CONSIDERATION OF PUBLIC COMMENTS.

A public comment period of at least 30 days will be provided prior to the adoption of the Consolidated Plan or implementation of substantial amendments. City staff will prepare a summary of all comments received in writing, or orally at the public hearing. In cases where citizens' views are not accepted, the city will provide reasons for the decision.

### CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORTS

Before the City submits a Consolidated Annual Performance and Evaluation Report (CAPER) to HUD, the proposed CAPER will be made available to those interested for a comment period of no less than 15 days. Citizens will be notified of the CAPER's availability by public notices as outlined above

The CAPER will be available on the City website during the 15-day public comment period. Hard copies will be provided upon request. Any comments from individuals or groups received verbally or in writing will be considered. A summary of the comments, and of the responses, will be included in the final CAPER.

### SUBSTANTIAL AMENDMENTS

A substantial amendment is defined as a proposed change in allocation of funds after the official adoption of the Consolidated Plan that affects 10 percent or more of the City's annual allocation of CDBG & HOME funds. A substantial amendment may also be required to carry out an activity not previously described in the action plan.

Any changes in the distribution of funds caused by changes in federal funding allocations after the Consolidated Plan/Annual Action Plan's draft comment period has expired will not be considered a substantial amendment.

Substantial amendments to the approved Consolidated Plan will be made public by public notices as outlined above. The City will receive and consider comments delivered in writing or orally at a Public Hearing on substantial amendments to the Consolidated Plan for 30 days before implementing those amendments. Approved amendments and a summary of comments will be attached and uploaded to the plan being amended within the Integrated Disbursement Information System.

If a state of emergency is declared which requires reallocation of funds and/or receipt of disaster recovery funding, the City will follow any abbreviated notice and approval process as published within a HUD CPD notice.

### CITIZEN COMPLAINTS

Citizens who have objections or complaints about the Community Development Programs may submit a written complaint to:

> Community Development Department City of Auburn 60 Court Street Auburn, ME 04210

The complaint should include the date, name, address, telephone number of the complainant, convenient hour to reach that person by telephone, nature of the complaint and location. The complaint may also be given orally. The person initiating the complaint will schedule a meeting with the Community Development Manager and a formal complaint will be formulated from the interview that will be signed by the complainant.

There will be a written response, within 15 days of receipt, to the complainant. The response will indicate the ultimate disposition of the complaint.

### PUBLIC ACCESS: Availability of Documents

The final Consolidated Plan, any substantial amendments, and annual performance reports will be made available to the public on the city's website. Copies will be available in printed form or electronic means upon request.

### Access to Records

The City will provide all interested parties with access to information and records related to the Citizen Participation Plan, Consolidated Plan, Action Plan and any amendments by posting it in a translatable form on the city website. Hard copies can be requested, and accommodations will be available to individuals with visual or hearing impairments. Records relating to these documents can be requested for the preceding five years. The public will be provided reasonable access to housing assistance records, subject to laws regarding privacy and obligations of confidentiality.

### Accommodations

Arrangements will be made for non-English-speaking persons and persons with special needs for mobility, hearing and visual impairments, or the homebound. Please contact the Community Development Department in advance so that arrangements can be made to provide adequate communication assistance. Access to these accommodations can be attained by contacting the Community Development Office ahead of time at (207) 333-6601 or emailing CDBG@auburnmaine.gov.