

## **PR-15 Public Participation & Consultation**

*IHFA and IDC received many public comments regarding the Consolidated Planning during the information gathering and drafting phases; a summary of those comments is provided herein. Many comments received were someone's life story, personal beliefs, values, judgments, and criticisms, while others provides web links, sample letters, and general information.*

*When IHFA and IDC originally submitted the Public Participation and Consultation to HUD-CPD, all comments were accepted with the belief they should be because they were from Idaho's citizens. However, HUD-CPD Region X office defines the term "acceptance" as an agreement by IHFA and Idaho Department of Commerce to undertake the action identified in the comment. Because of this interpretation, IHFA and IDC is forced to revise the status of many citizen comments to "Not Accepted". The reason for not accepting a comment is found below the comment. Most often a comment is not accepted because the action required is outside the scope of IHFA and/or IDC's organizational authority, program(s) requirements, or jurisdiction.*

***Reason for not accepting a comment is noted below the comment***

### **I. Pre-Draft 30-Day Comment Period**

#### **Sort #1: Pre- Draft Public Hearing**

##### **Summary of Comments**

***Sign-in sheet for this hearing is included***

1. A majority of public hearing comments mirrored written comments asking IHFA and IDC to explore the use and benefits of a "Housing First" model to end homelessness. Many comments also suggested the need for supportive housing for the chronically homeless who have drug and alcohol issues.
2. See Housing First! Sample Letter that was used several individuals. The sample was submitted as an attachment to an email comment.
3. **Not accepted-** Supportive housing program that drug tests creates a barrier to housing.
4. **Not accepted-** Supportive housing program that drug tests creates a barrier to housing.

*Due to the wide variety of homelessness interventions and solutions, and the limited number of service and housing providers throughout the state, supportive housing providers will not be forced to remove drug testing from their screening and eligibility processes. Doing so would further limit the availability of, and access to, homeless-targeted resources. However, IHFA will consider sponsoring a statewide initiative to encouraging homeless housing and service providers to adopt a Housing First-centered approach in their eligibility and screening practices.*

5. **Not accepted-** Homeless numbers and issues have become a static. IHFA and IDC have a responsibility to the citizens of Idaho and should do a "white paper" to the legislature that spells out affordable housing needs in Idaho connecting it with economic and community development issues.
6. The previous ConPlan had 4 action items but these did not address the inadequate funding and how to change the "situation with the legislature, i.e. the Idaho Housing Trust Fund created by the Idaho legislature in 1992, without a funding mechanism.

7. Ending homelessness is possible and not complicated these [HOME, ESG, CDBG] programs can make it happen. All that is needed is a structure to infuse money to structures that work.
8. Permanent supportive housing is needed to help Idaho's chronic homeless.
9. A change in the current funding structure is needed. While competition for funding is understood, "Housing First" should be implemented.
10. **Not accepted-** The City of Boise should have its own Low-Income Housing Tax Credit program.  
*Outside the scope of IHFA or IDC authority, program(s) requirements, and/or jurisdiction(s)*
11. **Not accepted-** The City of Boise wants to "criminalize homelessness".  
*Outside the scope of IHFA or IDC authority, program(s) requirements, and/or jurisdiction(s)*
12. **Not accepted-** A comment regarding personal homeless and emergency shelter experience because of a disability, and the time it took to get funding. "Affordable housing isn't affordable". Is still concerned about where they will live if the Shelter Plus Care program ends.  
*Personal opinion, no action required.*
13. **Not accepted-** Statement regarding commenter's online talk show, and personal experiences with alcoholism and sobriety, a friend who is homeless, and the experience of not qualifying as homeless because of having friends and a car. Many homeless are not addicts or alcoholics. "Where do the homeless live if they are in need of alcohol or drug treatment?"  
*Outside the scope of IHFA or IDC authority, program(s) requirements, and/or jurisdiction(s)*
14. Statement about Idaho's current housing vacancy rate and that people living on assistance cannot find a place to live that is within their price range, i.e. housing that is income-based.
15. *Outside the scope of IHFA or IDC authority, program(s) requirements, and/or jurisdiction(s). ESG funds are specifically designed to be used for emergency shelters, homelessness prevention, and rapid re-housing. To decline the use of funds in this manner, is to decline the acceptance of funds and discontinue funding shelter activities. Numerous types of homelessness solutions are necessary throughout the state. There is not a one size fits all intervention; emergency shelters are needed in Idaho.*
16. **Not accepted-** Shelters are a band-aid and are needed, but they don't solve the problem. Shelters create stress levels that create alcoholism. If a person doesn't need to go the emergency room and has food, but no place to go, they are criminalized in Boise.
17. *Outside the scope of IHFA or IDC authority, program(s) requirements, and/or jurisdiction(s)*
18. Millions and millions of dollars have gone into homelessness [in Idaho] and it's a waste of money. Shelters create a group of enablers and enabled. We need to look outside of Idaho [for solutions]. "If the same programs used for the last 5 years, are used for the next 5 years, it is going to create a disaster. [These programs] are not the solution, but they are part of the solution. "
19. Working a full-time minimum wage job in Idaho cannot afford a basic 2-bedroom apartment. Veterans and persons with disabilities cannot afford a market rate apartment in Idaho. [These] programs don't address the fact that market rate housing doesn't help our housing needs. Suggests calling Utah and maybe they could send some people up to Idaho to help restructure some things.

20. Trying to quantify best use of funds by the number of lives improved may not be the best way to determine how money is spent, i.e. do the dollars spent on road improvements/highway districts determine the number of lives improved? Encourages a different way of scoring funding proposals to factor the number of hours each day people's lives are improved.
21. **Not accepted-** Feels sex offenders are discriminated against in Section 8 housing. Parks could be opened up at night for sleeping. [Boise] doesn't want them sleeping under the bridge. The rental space to park a mobile home in Garden City is more expensive the payments to purchase the mobile home.

Outside the scope of IHFA or IDC authority, program(s) requirements, and/or jurisdiction(s)

22. **Not accepted-** How to create incentives to provide space for the homeless? A tax credit to let someone park or build a tiny house in a vacant lot, penalize companies that have empty buildings (without humans), which would also apply to banks that are foreclosing. 'Not doing something like this is why there is empty housing and people living on the streets.'

Outside the scope of IHFA or IDC authority, program(s) requirements, and/or jurisdiction(s)

## **Sort #2- Summary of Written Comments**

### **23 Written Comments received**

1. Multiple written comments addressed the "Housing First" Model as the way to resolve homelessness in Idaho. Several comments referred to other state's model programs, i.e. Arizona and Utah. A substantial number of comments had the same formatting, style and substance. Several of the comments indicated the author worked with the homeless, several others were homeless themselves, and others were homeless advocates.
2. A scoring preference for proposals [programs] that meet the criteria outlined in the U.S. Interagency Council on Homelessness' Housing First Checklist should be designed.
3. One comment suggested the homeless have other problems such as poor health and lack of nutrition, joblessness, minimum wage jobs, poor education, and mental illness, but these problems cannot be solved without a decent place to live.
4. Several comments regarding the need for an Idaho Housing Trust Fund.
5. **Not accepted-** One comment suggested IHFA and IDC have a responsibility to engage the Governor and Idaho's Legislators regarding state funding for affordable housing in Idaho including a Housing Trust Fund. 'A white paper could restart the conversation.'

Outside the scope of IHFA or IDC authority, program(s) requirements, and/or jurisdiction(s)

6. **Not accepted-** One comment regarding the necessity of dedicated funding to help lower-income homeowners with minor ADA improvements for their homes.

Outside the scope of individual program requirements. However, IHFA has an accessibility improvement program that from time to time receives private funding. When funds are available, the funds are disbursed on a first come, first serve basis from applicants.

7. Several comments mentioned the high cost of rental housing in Boise and Idaho, the number of cost-burdened renters in Idaho, and that Idaho's low-wages have created this.
8. **Not accepted-** Comment that Idaho is a State that prides itself as having family-values, but allowing homelessness is a lack of family-values.

*Outside the scope of IHFA or IDC authority, program(s) requirements, and/or jurisdiction(s)*

9. From one individual

- A quote from the Director for the "100,000 Homes Campaign" speech taken from the 2014 Ending Homelessness Conference Lets get to Zero. Included a YouTube video of the speech at <https://www.youtube.com/watch?v=Efk2r3M5IGg#t=249> .

- **Not accepted-** Income needed in Idaho to afford the rent and utilities on a standard 2-bedroom apartment is \$13.31/hour while Idaho's average renter earns \$10.54/hour.

*Outside the scope of IHFA or IDC authority, program(s) requirements, and/or jurisdiction(s)*

- **Not accepted-** Idahoans working full-time at minimum wage must work 73 hours/week/52 weeks per year to afford standard 2-bedroom Fair Market Rent apartment.

*Outside the scope of IHFA or IDC authority, program(s) requirements, and/or jurisdiction(s)*

- A "sensible video explaining Housing First" <http://bit.ly/1rRRE7N>, as well as an article written about a Housing First project in Los Angeles, <http://bit.ly/1prT5Ks>
  - Copy of a sample letter and a statement "use it or develop your own, but please answer the call for public comment by writing to . . . [IHFA and IDC] these agencies must include our written comments in the plan they submit to receive dollars from federal agencies. Our voices will be heard!"
  - 2014 Congressional District Profile, 2014 Idaho State Housing Profile [National Low Income Housing Coalition] [www.NLIHC.org](http://www.NLIHC.org), "2013 Hours at Minimum Wage Needed to Afford Rent //Out of Reach 2013".
  - **Not accepted-** ACLU Open Letter addressed to City of Boise Mayor and Council dated 9/23/2014 regarding Boise City Ordinance 38-14.
- Comments not accepted are outside of the scope of IHFA/IDC authority, program(s) requirements, and/or jurisdiction(s)*
- Appears to be copies of multiple personal tweets of comments made at the 10/22/2014 Pre-draft public hearing that include individual's personal comments.
  - A statement of general dissatisfaction with the overall public hearing process, including the "limited the amount of time each speaker was allowed", a "complicated sign-in process" that created a "chilling effect on speakers and non-speakers".

## II. Sort #3- Consolidated Plan (Post Draft) 30-Day Comment Period

Sign-in sheet attached to this document

**Public Hearing**

1. **Portions not accepted(see underlined)** One of our present concerns is the many familiar faces we see coming in to Corpus Christi House over the past years. Normally, as people move on with their lives, their place at a shelter is filled with a new person. This flow is needed so that a shelter can have the room to serve the new arrivals. When this flow stops, the shelters fill up sending the overflow out into the streets. As more people enter the chronic homeless category, the shelter programs are stressed. This is what we have witnessed in Boise this winter. A big lesson that we learned in the past ten years is when it comes to the chronically homeless we don't need to fix everything to improve their lives. The one fix that will be a "win win" solution is to get many of the chronic homeless into permanent housing. Studies have shown that the best way to deal with the challenge of homelessness is to give homeless people homes to live in. To some it sounds utopian and it's natural to worry about the cost but a great deal of evidence suggests that it would be cheaper to house the homeless than to let them languish on the streets and deal with the aftermath. This strategy called Housing First centers on providing homeless people with housing quickly and then providing services as needed." What differentiates a Housing First approach from other strategies is that there is an immediate primary focus on helping individuals and families access and sustain permanent housing. This approach has the benefit of being consistent with what most people experiencing homelessness want and seek to achieve. You don't even really need new public money. What you need to do is to target those resources at the core of the problem, a lack of housing and deliver the housing rather than spending twice as much on sporadic legal and medical interventions. I would be a cheerleader of all of the work that has been done to decrease the number of chronic homelessness. The little that we have done by private agencies is really being stressed and if the number increases of chronic homelessness and continues to increase, it will break down and a lot of these agencies that are struggling to fulfill the job I think will disappear and then the problem will get worse.

The increased visibility of homelessness in Boise is clear. Evidence that our lack of affordable housing and inadequate community response [is evident in the ] Annual Point-In-Time count show that the number of homeless in Boise and counting increased in 2014 and significantly so with households with children. A 17% increase since last year in a number of households and a 22% increase since last year in the number of individuals [and ] households. I don't know where you drive, I live pretty close to the shelter areas and there are a lot of families walking around, mothers with strollers, kids tagging along, it's increased. Of course, the recession has been hard we hear we are pulling out of it. Boise was referenced as having the second fastest rising poverty of any city in the country during the period of 2000 to 2012. We've come to understand that the solution Housing First is the most cost effective and most humane. Successful programs like this across the country support this. Many of us were here last fall advocating for changes that would support Housing First solutions in this plan through any kind of method that you would understand how to use within the constraints of the program whether it was bonus points, set asides, tax credits. I couldn't find any reference to the current plan to those comments. Maybe we have a misunderstanding and maybe someone can clarify for me later. Page 13 references public comment periods, but I didn't see comments listed. There were about twenty to twenty five people here making comments about mostly Housing First and I found it hard to determine where they were specifically [not mentioned] in the plan. The Homeless Coalition reiterates it request that the Consolidated Plan be modified to include a commitment to review and revise the funding criteria for the LIHTC loan tax credits, CDBG, HOME and ESG programs wherever applicable giving preference or bonus points for Housing First solutions and project or infrastructure that support Housing First projects. I believe that Idaho's State Housing Trust Fund has been in place since 1992 but never funded. I know you all are not responsible for never funding that but I didn't find that trust fund mentioned in the plan either. I hope that it's there correct me if I'm wrong but even though it has never been funded but if it is still in statute, it's a legitimate part of our housing landscape and it was promised to the people of Idaho in 1992. It's unfulfilled at this time but I feel that it should remain in our language and in any conversations we have with our legislatures we would ask that the IHFA and IDC perhaps if it's within your responsibility or ability

to maybe produce some sort of report that presents information to the legislatures and the Governor that addresses this critical need that we do have and might help them understand it's importance not only for Boise and Ada County, but across the state, that this can be funded and used. I feel that we are in crisis I know this country is.

In an environment where little to no communities are represented by multiple requests for funding, incentivizing agencies with the ability to receive bonus points doesn't promote changes in practices. As mentioned, IHFA will consider sponsoring a statewide initiative to encouraging homeless housing and service providers to adopt a Housing First-centered approach in their eligibility and screening practices.

2. I'm a [homeless] service provider and one of the main parts of my job is to house people experiencing homelessness no matter what their income level and mostly just second everything [ ] just said. To my understanding, this is the Five-Year Plan Draft, but you can make changes to it. I don't understand all of the programs, it is all written in such a way that [for ] layman like me, it doesn't make much sense. I'd maybe ask for a more succinct version so that layman can have more meaningful discussion about it because the better we understand it the more we can give our input where things can be directed. I will share with you my experience on what it's like to try and house people experiencing homelessness with little to no income and hopefully, I can help guide you where to direct funds to end homelessness. I think it's really important that first, in order to get a lot of people in the community out of the experience of homelessness it's important to start with the most vulnerable and that would be like 30% or so less income, so directing a lot of and allocating a lot of funds to that section of people would be I think a pretty important thing to do. I also think that choosing programs to direct those funds to that don't discriminate against those people that are experiencing addition problems which is like just a symptom of trying to treat mental illness like trying to self medicate mental illness that they don't have resources to treat aside from whatever substance so basically advocating for Housing First which means getting someone in a home which is a basic human right to have shelter, getting someone in a home and then figuring out all the things that can take place to treat the addiction, to treat the mental illness that causes the addiction and find employment and everything else after that. Hope that helps.
3. I work with Corpus Christi people, serving them breakfast and they're wonderful people for the most part, they're very appreciative. A lot of them are very intelligent. I was surprised, I was new to it about a year ago, and very surprised of the quality of people that are in there, and it kind of breaks my heart. Every night when I go to bed I think, look at me with all of this comfort and those people are down there under the bridge and so being old, I'm feeling a real urgency to see these people housed. It's my dream and I'm working in a pilot task force or project to try to get Housing First for these people. It takes time they say but the problem is that these people don't have time. They are down there sleeping in the cold and we can do something, the money is there, I know it is. We can do something for these people and I don't need to recount Lloyd Pendleton's Salt Lake City program but you know he's down to 20% now for the people that are homeless. So we know it can be done, this Housing First works. I'm asking you to consider very strongly helping us to get Housing First in Boise and the areas around Boise. Just want to say that when you choose to ignore the homeless, you are ignoring your community. These are our people and we really need to take care of [them].
4. [summary] I did some research last night, it didn't take me very long. Apartments are almost non-existent, if you can even find one for \$580.00. A one bedroom average price is \$680.00. A voucher is \$620.00 and doesn't include utilities. I also did some further research and the Federal guideline is \$11,770 a year; minimum wage is \$7.25. They printed it \$15,008.00 and that is if you don't take any time off and what if you are not a full-time employee? That doesn't include taxes. I figured out without the taxes they don't take you are looking at 15% with state taxes and add social security with it you are looking at \$[ ] take home pay which poverty level is about \$1,770, by the time you are done you are looking at \$234 a month for groceries, transportation and any other needs. That's not enough. So minimum wage is a problem,

affordable housing is a problem. I don't know if we can come up with more incentives for people to lower their rents. I actually went to a CoC meeting, we weren't allowed to comment, we were allowed to observe. It was landlords and property managers and they have problems too because. Well unfortunately, it is supposed to be transitional housing for two years or a year and then they can't get in to the higher market place. So people who get vouchers have another [source of rent funds]. Unfortunately there is a whole generation of homelessness; It's no longer the old wino, its twenty-year olds and kids.

### **Summary of Written Comments**

1. **Portion Not accepted-** Taxpayers deserve to get more "bang for each tax dollar spent on housing and community development . . . Idaho should prioritize funding for Idaho's top unmet housing need for Idaho's poorest residents beginning with people who are chronically homeless. Commenter encourages Idaho to follow AZ and UT Housing First model. Includes cost- benefits for the Housing First Model including alignment with the "State 10-year Plan to end Chronic Homelessness". Comment that a Housing First model in Idaho in 2014 would have "saved Idaho taxpayers \$15-\$37 million- conservatively estimated".

*Based on Idaho's 2014 Housing Needs Assessment, housing the chronically homeless is not Idaho's top unmet need.*

**Not accepted-** Consolidated Plan should reference the Idaho Housing Trust Fund and the fact that Idaho's legislature never created a funding mechanism. Link to [Role of Affordable Housing in Creating Jobs and Stimulating Local Economic Development](http://tinyurl.com/o632hdl)--<http://tinyurl.com/o632hdl> shows affordable housing is foundational to economic development and job creation. There is a growing concern in rural/semi-rural places like North Central Idaho where Idaho Dept. Commerce grant has brought employers to communities, but there is not always decent, safe, or sanitary affordable housing for those that might take the jobs created.

*The Idaho Housing Trust fund was in fact funded at one time, albeit it was several years ago and the allocation not continuously renewed.*

*Commerce's philosophy is that by creating and recruiting jobs to a rural / semi-rural places that new jobs and revenue would lead to the demand for new housing stock. Therefore, aside resort areas, the new housing prices would align with what workers in the area could reasonably afford. It would be difficult to approach from a supply perspective and expect housing to be in-place prior to trying to create and recruit jobs.*

**Not accepted-** Below are two links that should take you to a 2014 map of housing affordability on a county-by-county basis that shows the number of units affordable to each 100 Extremely Low Income households. This information, if were updated, would help IHFA and IDC in making determinations where these agencies should target housing and housing-related funding. If the information were further broken down by family and elderly housing needs, it might help to do fine tune targeting of funding.

<http://nextcity.org/daily/entry/map-rental-housing-crisis-by-county-urban-institute>  
<http://blog.metrorends.org/2014/03/america-rental-housing-crisis/>

*Information provided in the ConPlan is pre-populated by HUD. Neither IHFA nor IDC target affordable housing on a geographic basis. Additional information regarding the competitive application and award process is contained within the body of the ConPlan.*

**Not accepted-** IHFA and IDC should jointly fund a white paper produced with university expertise to analyze the need for and connection between affordable housing in different market areas to support economic development. Would provide the information that the state's lawmakers, policy-makers, advocacy groups, and citizens need to begin a dialog about capitalizing the State Housing Trust Fund. After all, it was a promise once made to Idaho citizens. Now, the state should find the reasons to keep its promise and make affordable housing part of its economic development strategy.

*Outside the scope of IHFA or IDC authority, program(s) requirements, and/or jurisdiction(s)*

Comment about a recently released National Low Income Housing Coalition article, [Affordable Housing is Nowhere to be Found for Millions](http://nlihc.org/article/housing-spotlight-volume-5-issue-1) -- <http://nlihc.org/article/housing-spotlight-volume-5-issue-1> that the state[Idaho] falls below the national average in providing housing that is affordable to those households with incomes at 30% or below area median income. There is a deficit of more than 28,000 housing units that are affordable to this income group and 76% of these households are severely rent-burdened. There are only 29 housing units that are affordable for every 100 households in this income category.

**Not accepted-** IHFA should consider providing application scoring and financial incentives in the HOME program to favor applications that will focus on housing those with incomes at or below 30% AMI.

*While IHFA could award HOME funds to activities that serve only households ≤30% AMI, the activity(rental housing and homebuyer) must be able to demonstrate the ability to remain viable throughout the entire HOME Period of affordability.*

**Not Accepted-** IDC should establish bonus points for CDBG projects that support or are for Housing First projects.

*Not all communities that are eligible for the State CDBG funds are likely to agree that a "housing first model" is the best method to deal with homelessness in their community, Commerce does not want to penalize other homelessness programs or shelters from receiving CDBG funding by giving priority to "housing first modeled" projects.*

Link to Million Dollar Murray story [Million Dollar Murray](http://gladwell.com/million-dollar-murray/) (<http://gladwell.com/million-dollar-murray/>)

[Utah](http://www.sltrib.com/sltrib/politics/58493059-90/according-chronic-homeless-homelessness.html.csp) (<http://www.sltrib.com/sltrib/politics/58493059-90/according-chronic-homeless-homelessness.html.csp>)

2. **Not accepted-** The Consolidated Plan should include more information about the process that will be used to develop a Housing First Model. It should include a timeframe and description of the public participation process including engagement with key stakeholders including providers and the homeless community.

*IHFA is still evaluating and assessing housing first project models, and working towards the development of a feasible and sustainable project proposal. The timeline is unknown and the details of the process and IHFA's proposal will be publicly announced once a strategic plan has been created and necessary resources have been committed.*



**Not accepted-** This is an inconsistency between the draft and the State of Idaho's plan for the \$30 million in CDBG funds it estimates it will receive in the next 5 years. The State plans to spend a vast majority on Public Facilities or Infrastructure Activities other than low/moderate Income housing benefit.

*What the author does not likely realize is that under the CDBG program, public facilities do allow for the construction of infrastructure to support low/moderate income housing and allows for the rehabilitation of existing low/moderate income housing stock.*

This is not in alignment with the research of the Needs and Market Analysis or the "unprecedented public input" received. This is a major issue and merits further explanation/clarification in the final draft, if not a re-evaluation of the State's plan for CDBG funds. A lack of alignment between the State's "highest unmet housing need" for 30% AMI persons and its plan for CDBG is not satisfactory. The Plan states it will leave the "delivery structure" for CDBG funds largely unchanged to keep the process familiar for local governments. The draft continues to 'make it easier for local governments and IDC to maintain the status quo, i.e. doling out federal money to local governments to spend on popular but unnecessary amenities like parks and youth centers, rather than bring CDBG funds to the State's need for affordable housing for its lowest income residents. There is not sufficient justification for local governments or IDC for failing to allocate the largest portion of federal funding that the State will receive, in alignment with the State's "top unmet need".

*Local governments determined their community development and housing needs and the activities to be undertaken to meet these needs.*

". . . It is also particularly problematic given the hypocrisy of so many of the local governments at issue. Taking every opportunity to bash the federal government while at the same time relying upon federal money to fill gaps in their toolboxes for revenue-generation, which gaps, incidentally, are in line with their own rhetoric and conscious political choices is the height of hypocrisy and political cowardice (68)."

"If Idaho's local governments want local option tax and other mechanisms to fund things like parks, senior centers, and youth centers, then they must take that request to the Idaho Legislature. Tantrums about having to adjust to changes in the delivery structure of a federal block grant program that have been made in order for that program to properly address unmet vital needs are inappropriate at best; a sign of local governments deeply out of touch with the needs of the people they serve at worst. . . Commerce would do well to recall that it is spending the federal government's money, and should treat its plans for that money with the seriousness it deserves. Just as "ignorance of the law does not excuse" persons who find themselves entangled in the criminal justice system, so the political expediency of cheapness does not excuse local governments or Commerce from allocating CDBG funding responsibly. . . I am also compelled to inform IHFA & IDC that, due to efforts by local governments to criminalize homelessness across the state of Idaho, it is increasingly unlikely that parks funded with CDBG money would in fact serve Idaho's lowest income residents in a way that aligns with Congress's intentions. Perhaps if Commerce insists upon continuing with its existing plans for this money, it could at least take into account whether the governments applying for the money have criminalization measures on the books, subtracting points from any applicants that do. "

NA-50, "Non-Housing Community Development Needs" cites "parks and recreation facilities, community centers, and youth centers" as Idaho's "top three public facility needs" (37). These amenities are lovely things to have in a community, but they are not "needs." Communities can function without them. By contrast, communities cannot function without adequate housing that is

affordable to all of their residents. The costs of homelessness—economic, social, and spiritual—loom large across Idaho.

Details about the extent of the State’s efforts to determine “local government needs” are vague, and merit further fleshing out in the final draft. The draft indicates that the State sent 237 “local government needs” surveys to determine “Idaho cities and counties non-housing community development needs” (37). Why was this “local government needs” survey limited to “non-housing community development needs”? Additionally, of the “237 surveys sent out, a total of 98 responded” (37). This abysmal response rate is troubling and begs questions about the method of outreach and extent of follow-up to the initial request. Were local cities and counties sent a single email, or were the surveys sent by mail? Did they receive follow-up phone calls? Were cities and counties informed about why they were being surveyed and the import their responses would have on the State’s upcoming 5-year consolidated plan? Was an effort made to ensure that the cities and counties were educated about the 5-year consolidated plan—what it is and why it matters?

The description of the need for “Public Improvements” in section NA-50, “Non-Housing Community Development Needs,” notes street, water, and sewer systems as the top three non-housing needs, based on the American Society of Civil Engineers 2012 Report Card for Idaho’s infrastructure (38). In contrast to the parks, senior centers, and youth centers favored by local governments in their survey responses, these public improvements are genuine needs. However, given that there are a number of other existing and potential funding sources for these vital needs—Garvee bonds for transportation, for example—using CDBG funds to cover these needs strikes me as robbing Peter to pay Paul. Are federal taxpayers being asked to shoulder the burden left by irresponsible (in)action of state lawmakers? The final draft of this section would be much improved by a consideration of who—local, state, federal—bears what responsibility for Idaho’s failing grades in these areas.

The draft indicates that median home values are higher than the home-buying market—new-hires in particular—can afford (46). An intriguing and important fact, the draft offers no explanation for this discrepancy. I hope this information gap will be addressed in the final draft.

All but one of the barriers to affordable housing cited in MA-40, “Barriers to Affordable Housing,” are “City and County Zoning.” Examples would be helpful. The “Efforts Planned to Reduce Housing Affordability Barriers” does not mention zoning. (56-57)

Disproportionately greater need among Latinos across all incomes. The draft does not explain what the State will do to remedy this disparity.

For the most part, the needs outlined in the “Priority Needs” section are ordered in alignment with the data outlined in the needs and market analyses sections. I am concerned, though, about the sheer number of high priority needs. It seems to me that given a limited amount of resources, the funds affected by this consolidated plan ought to be more narrowly focused. This is the fiscally responsible thing to do. Individual households on limited incomes are advised to prioritize and pay rent or their mortgage first. Seems to me the state of Idaho ought to be following this same advice on a macro scale with respect to the funds governed by this plan.

The strategic plan lumps together funding for housing and non-housing related activities under CDBG. This is confusing at best; and creates an appearance of a deliberate effort to mislead at worst. The public would appreciate Commerce’s honesty about the extent of its commitment to Housing First.

Commerce's commitment to assisting with the homeless population is outlined in SP-45 Goal Summary. Specially, goal #2 – public infrastructure / facilities for compliance and goal #3 – public facilities / infrastructure for rehabilitation.

It is one thing to be forthcoming and choose, transparently, not to spend CDBG funds in alignment with the State's housing needs; it is another to create the appearance of being on the Housing First bandwagon only for the balance sheets to reflect betrayal at a later date. . . All but one of the barriers to affordable housing listed in the first draft are local zoning. While Zoning is certainly important, it is by no means the entire picture. IHFA, having been involved from the beginning, is well aware that a group of stakeholders convening over the past year to create an analysis of impediments to fair housing for refugees has, in the course of its discussions, come up with many more barriers to affordable housing than are reflected here. Perhaps the person responsible for this draft could get in touch with Erik Kingston-- the IHFA representative at those meetings, and use his notes to properly fill out this section in the final draft. . . I also noticed that while zoning is mentioned, no specific examples-- of zoning codes in particular cities/counties that create barriers to affordable housing-- are cited, and the plan does not clearly state what IHFA & IDC's roles will be in addressing these issues. The draft talks about education, but does not specify education / information about how zoning affects affordability. More specifics would be appreciated in the final draft.

3. **Not accepted**-Two comments submitted had the same language: The new Plan should prioritize funding for Idaho top unmet housing need: Affordable housing for our poorest residents, beginning with chronic homeless. Permanent supportive housing programs that take a Housing First approach are the most cost effective and have great success in Utah and Arizona Housing First frees up resources for community service providers and aligns with the State's 10-Year Plan to end Chronic Homelessness and with the Federal Opening Doors program to end chronic veteran' homelessness by next year!

Prior comment mirrors this comment with reasons for non-acceptance identified

4. People fare better on all kinds of measures—from jobs to education—when they are stably housed.
- Housing one person experiencing chronic homelessness frees up ten emergency shelter beds.
  - Housing First in 2014 for all people experiencing chronic homelessness in Idaho would have saved taxpayers between \$15 and \$37 million—conservatively estimated.
5. **Not accepted**- Due to the increasing cost of construction projects, raising the limit on CDBG from \$500K to \$750K would be a good idea.

Commerce will not pursue an administrative rule change to increase the maximum CDBG award from \$500,000 to \$750,000 at this time. It is likely that construction costs are increasing, however, it's likely that the state CDBG allocation will not be increasing in the next five years. In fact, its possible that the state CDBG program will lose funding, due to federal funding cuts and the addition of more entitlement cities. Also, with the uniqueness of the CDBG program's ability to fund a number of eligible activities, Commerce prefers the flexibility to spread CDBG throughout the state, via more projects, in an effort to benefit more LMI individuals and invest CDBG where its need is the greatest.

6. Thanking IHFA for 'continuing to prioritize targeted solutions for preventing and reducing homelessness, providing administration of the Homeless Management Information Systems (HMIS), and directing efforts to increase the Continuum's effectiveness and efficiency through coordinated assessment and strategic planning. '

## Housing First! Sample Letter

Hopefully you will agree with me that housing is one of the most basic of human rights. In our great state, it is appalling that we have a housing crisis at all—yet we do.

Your organizations have it within your grasp to actually DO something about it. NOW is the time to end homelessness here in Idaho.

It is our opinion that you (and your organizations) should be acting with a sense of urgency. ACT as if it was one of your family members experiencing homelessness-- perhaps a veteran who proudly served and returned to country experiencing PTSD. Now they are not only unable to get proper care for their service-related disabilities, they are having great difficulty obtaining/keeping employment, and are living on the street. Perhaps they are a single mother struggling to overcome mental health problems, attempting to support their child/children while worrying about where they'll sleep that night, or how they'll prepare food for their family.

John Bradford's saying "There but for the grace of God go I" comes to mind. Please keep this in mind and act accordingly...

We thank you for the opportunity to comment on housing & community development priorities for the State of Idaho's upcoming 2015-2019 Five-Year Consolidated Plan (Plan). Idaho taxpayers deserve to get as much bang for each tax dollar spent on housing & community development as possible.

According to Idaho's 2014 Housing Needs Survey, Idaho's top unmet housing need is rental housing that is affordable for our poorest residents.<sup>i</sup> The federal CDBG, HOME, & ESG funds governed by the Plan should be put to use meeting this need, beginning with people experiencing chronic homelessness.<sup>ii</sup>

The most cost effective solution to chronic homelessness is permanent supportive housing that takes a Housing First approach.<sup>iii</sup>

Housing First has been enormously successful in places like Utah and Arizona where it has been adopted state-wide.<sup>iv</sup> Therefore, the Plan should also:

Request and give preference to proposals that meet the criteria outlined in the US Interagency Council on Homelessness' Housing First Checklist.<sup>v</sup>

Adopt the Housing First Checklist to screen applications for funding that purport to take a Housing First approach.

Housing First is already working in some Idaho communities. In the Treasure Valley, the Boise City Ada County Housing Authority (BCACHA) administers four Housing First programs—CHOIS, Shelter + Care, HOPWA, and VASH—in partnership with local supportive services providers El-Ada Community Action Partnership, Terry Reilly Health Services, Safe Place Ministries, Health & Welfare Region 3, and Veterans' Affairs.<sup>vi</sup> These programs serve \_\_\_\_\_ people in 219 households (does not include S+C region 4) and are estimated to save

taxpayers\_\_\_\_\_ per person per year, conservatively.

On average, BCACHA's Housing First programs cost \$8,500 per person, per year. Extrapolating using this figure, Idaho could end chronic homelessness for less than \$4 million per year.<sup>vii</sup>

### **Housing First Facts**

People fare better on all kinds of measures—from jobs to education—when they are stably housed.<sup>viii</sup>

Housing one person experiencing chronic homelessness frees up ten emergency shelter beds.<sup>ix</sup> Housing First for all people experiencing chronic homelessness in Idaho this year would have saved taxpayers between \$15 and \$37 million—conservatively estimated.<sup>x</sup>

Please take 6 minutes to watch this incredibly sensible video showing the impact of Housing First in Utah: <http://youtu.be/YFZijmT10zI>. And check out this online *Washington Post* article about New Carver Apartments, a Housing First development of the Skid Row Housing Trust in Los Angeles: <http://www.washingtonpost.com/blogs/wonkblog/wp/2014/07/14/this-is-what-housing-for-the-homeless-could-actually-look-like/>.

Housing First saves taxpayers' money, frees up resources for community service providers, and aligns with Idaho's Action Plan to Reduce Homelessness and with *Opening Doors*, the national plan to prevent and end homelessness.<sup>xi</sup> Most importantly, Housing First saves lives! The evidence is in. Homelessness is over if we want it. Together, we can bring Idaho's annual point-in-time count to zero. You are Idaho's leaders for housing policy. Whatever you do will set the tone.

Sincerely,

<sup>i</sup>People who earn at or below 30% of the Area Median Income.

<https://commercestorage.blob.core.windows.net/media/Default/CDBG%20Files/Statewide%20Housing%20Needs%20Survey.pdf>. According to the US Census Bureau, the median household income in the state of Idaho is \$47,015:

<http://quickfacts.census.gov/qfd/states/16000.html>. 30% of this is \$14,104.50. For context, it is helpful to note that Idaho's full-time minimum wage workers earn \$10,712 per year: [https://labor.idaho.gov/publications/Minimum\\_Wage\\_Impact.pdf](https://labor.idaho.gov/publications/Minimum_Wage_Impact.pdf).

<sup>ii</sup>According to Idaho's Action Plan to Reduce Homelessness, four out of every five dollars spent on homelessness is spent on people experiencing chronic homelessness (8). See: [http://www.cdaid.org/files/municipal\\_services/IdahoHomeless.pdf](http://www.cdaid.org/files/municipal_services/IdahoHomeless.pdf).

According to this year's state-wide Point in Time Count, 12% of those experiencing homelessness in Idaho were chronically homeless (12). See:

<http://www.idahohousing.com/Portals/0/Media/grant%20programs/2014%20State%20of%20Idaho%20Point-in-Time%20Count%20Report%20Final-042314.pdf>. Housing people who are chronically homeless will free up resources to address other housing needs statewide.

<sup>iii</sup>See: <http://usich.gov/population/chronic> and [http://www.endhomelessness.org/pages/chronic\\_homelessness](http://www.endhomelessness.org/pages/chronic_homelessness).

<sup>iv</sup>Smart, Christopher. "Utah Praised for Initiative to End Chronic Homelessness." *The Salt Lake Tribune*. October 10, 2014. Online version last updated October 15, 2014: <http://www.sltrib.com/sltrib/politics/58493059-90/according-chronic->

[homeless-homelessness.html.csp](http://www.nytimes.com/2014/01/16/us/program-to-end-homelessness-among-veterans-hits-milestone-in-arizona.html?_r=2). Santos, Fernanda. "Program to End Homelessness Among Veterans Reaches a Milestone in Arizona." *The New York Times*. January 15, 2014: [http://www.nytimes.com/2014/01/16/us/program-to-end-homelessness-among-veterans-hits-milestone-in-arizona.html?\\_r=2](http://www.nytimes.com/2014/01/16/us/program-to-end-homelessness-among-veterans-hits-milestone-in-arizona.html?_r=2).

<sup>v</sup> [http://usich.gov/resources/uploads/asset\\_library/Housing\\_First\\_Checklist\\_FINAL.pdf](http://usich.gov/resources/uploads/asset_library/Housing_First_Checklist_FINAL.pdf)

<sup>vi</sup> Patterson, Jillian. Housing Programs Manger, Boise City Ada County Housing Authority. "Housing Programs Overview." Presentation to Boise City Ada County Continuum of Care Coordinating Team. September 25, 2014. Pages 15-21.

[http://hcd.cityofboise.org/media/272437/cocteam\\_recap9-25-14.pdf](http://hcd.cityofboise.org/media/272437/cocteam_recap9-25-14.pdf)

<sup>vii</sup> The 2014 Point in Time Count identified 244 people experiencing chronic homelessness in the state of Idaho (23). Annualized, this means that 488 people in Idaho experienced chronic homelessness this year.

<sup>viii</sup> Cohen, Rebecca. "The Impacts of Affordable Housing on Health: A Research Summary." *Insights from Housing Policy Research*. Center for Housing Policy and National Housing Conference. Washington, DC. May 2011.

[http://www.nhc.org/media/files/Insights\\_HousingAndHealthBrief.pdf](http://www.nhc.org/media/files/Insights_HousingAndHealthBrief.pdf)

<sup>ix</sup> Pendleton, Lloyd. Director, Homeless Task Force, State of Utah. "Homeless Planning." Presentation to Boise City Ada County Coalition for the Homeless. April 1-2, 2014.

<sup>x</sup> Chronic homelessness in Boise, for example, costs taxpayers \$40,000-\$85,000 per person per year—in 2007 dollars (City of Boise 10-Year Plan to Reduce & Prevent Chronic Homelessness, 6). See:

[http://mayor.cityofboise.org/media/243715/23842\\_10-Year%20Plan%20Final.pdf](http://mayor.cityofboise.org/media/243715/23842_10-Year%20Plan%20Final.pdf).

<sup>xi</sup> See: [http://www.cdaid.org/files/municipal\\_services/IdahoHomeless.pdf](http://www.cdaid.org/files/municipal_services/IdahoHomeless.pdf) and [http://usich.gov/opening\\_doors/](http://usich.gov/opening_doors/)