Public Hearing on Consolidated Plan and Citizen Participation Comments

Background
The Rhode Island Statewide Planning Program, Rhode Island Housing, and the Office of Housing and Community Development worked together to collectively understand and detail the housing-related conditions and needs of the state and solicit broad public feedback on strategies to improve conditions and meet these needs. See sections PR-10 and PR-15 for details on the coordination in gaining input for HUD and State planning documents. The coordinated effort was undertaken from 2012 to 2015 as part of a Sustainable Communities Grant secured by the Statewide Planning Program to update various elements of the State Guide Plan, with the interest of aligning the findings and recommendations of those elements with the required updates to the Consolidated Plan and the Regional Analysis of Impediments to Fair Housing. This effort included dozens of interactions with housing and community development stakeholders that informed this Plan.

In many ways, this public engagement process represents the most extensive public outreach ever conducted in Rhode Island to solicit input on housing and community development needs. The outreach and engagement process included: open work sessions; public forums; open houses; public hearings; focus groups; one-on-one interviews; “meetings in a box” with targeted groups; social media and crowd sourcing.

Notice of the public hearing and opportunity to comment on the draft report were provided in English through advertisement in the Providence Journal and in English and Spanish in the Providence American (see newspaper clippings as images at end of this report), as well as posting on the Statewide Planning Program, Office of Housing and Community Development, and Rhode Island Housing websites. Each of the six Entitlement Communities also advertised for the hearing as they have done in the past for their own Analyses of Impediments. This involved posting on their websites, as well as advertising in several local newspapers, including the Pawtucket Times.

The public hearing was held:
Wednesday July 8th, 2015 from 4:00 p.m. to 6:00 p.m.
Rhode Island Department of Environmental Management, Room 300
235 Promenade Street, Providence, RI 02908

To request a language or sign interpreter, the public was asked to call Rhode Island Housing 48 hours in advance at 401-457-1256.

Copies of the draft Consolidated Plan were posted on the website of Rhode Island Housing, Hard copies could be requested at Rhode Island Housing during normal business hours, by telephone, mail or e-mail. Hard copies were also made available at reference desks at libraries in Providence, Cumberland, Warwick and Westerly. All comments received by Saturday, August 8th were considered for inclusion in the final plan.

For more information or to comment, the public was asked to contact:
Amy Rainone, Director of Government Relations and Policy
Rhode Island Housing
44 Washington St, Providence RI 02903
arainone@rhodeislandhousing.org
401-457-1256
The hearing began with an informational presentation by Amy Rainone on the preliminary findings of the Consolidated Plan process and the format for which comments on the Plan would be received, followed by opportunity for public comment. In total, approximately 20 people attended the hearing, and 1 person (Jim Ryczek) gave verbal comments and 1 organization (Grow Smart Rhode Island) submitted written comments. One (1) organization (Green and Healthy Homes Rhode Island) submitted comments during the public comment period.

Summary of Comments & Responses at the Public Hearing

I. Jim Ryczek
   Executive Director
   Rhode Island Coalition for the Homeless

What Was Heard
1. The Coalition is concerned that the resources that are needed to end homelessness are really targeted at the people at 30 percent of adjusted median income or lower.
2. Much of our resources to implement Opening Doors, which is the state’s Strategic Plan to End Homelessness and has been adopted by the state, come from federal sources.
3. The state has stepped up its financial resources for homelessness (and Opening Doors), but it’s important to have planning.

Response
1. The ability to target populations of need depends on the funding and programming available. Many of the programs that address Goal 2, preventing and ending homelessness, provide rental assistance to households earning at or below 30% area median income OR have been homeless. Several of the programs in Goal 1, developing and preserving affordable housing, attempt to prioritize housing for extremely low income households. The challenge in developing housing for populations earning less than 30% area median income is the lack of operating support (rental assistance) to ensure that the housing is affordable to very low income residents.
2. The Anticipated Resources section of the Consolidated Plan details this difference. Only 20% of the funding that goes to support preventing and ending homelessness in the state (Goal 2) comes from state sources. However, another 22% of the total funding for homelessness objectives comes from Rhode Island Housing’s self-funded programs, which supports the state’s efforts.
3. The state’s planning efforts around homelessness have been improving. The state passed Opening Doors Rhode Island: The Strategic Plan to End Homelessness. The Consolidated Plan itself is an important planning tool that prioritizes the objectives of Opening Doors Rhode Island among programs funded through CPD or other HUD Departments. Two direct actions on the part of the state to improve planning and coordination around homelessness include the establishment of the Consolidated Homeless Fund (CHF), detailed in SP-60 Homelessness Strategy and the development of a Coordinated Access System, which standardizes intake and assessment procedures among all state-funded homelessness programs, including through the CHF and the Rhode Island Continuum of Care.

Changes to the Report
- No changes made.
Summary of Written Comments & Responses

I. Scott Wolf
   Executive Director
   Grow Smart Rhode Island

What Was Heard
1. Very supportive of the report. The five-year Consolidated Plan strategy should be formulated to help continue the state’s commitment to economic development and secure vitally-needed resources for our state’s residents who are struggling to get by.
2. The funding the plan can generate is critical to the state’s ongoing effort to revitalize neighborhoods, create appropriately sited and well-designed affordable housing, repair infrastructure, and secure resources for Rhode Island’s homeless.

Response
1. The Needs Assessment and Market Analysis sections of this Consolidated Plan address the comments regarding needs and resource prioritization reflected in Scott Wolf’s comments. The Strategic Plan, in its Goals and Outcomes, communicate how the state will address those needs.
2. The Strategic Plan provides the specific detail on how the state will revitalize neighborhoods (Goals 5, 6 and 7), create appropriately sited and well-designed affordable housing (Goals 1 and 4), repair infrastructure (Goal 6) and secure resources for Rhode Island’s homeless (Goal 2).

Changes to the Report
- No changes made.

II. Ruth Ann Norton
   President and CEO
   Green & Healthy Homes Initiative Rhode Island

What Was Heard
1. Lead-Paint Hazard Reduction
   - In 2012, the Centers for Disease Control determined that there is no safe level of lead exposure for a child and established a new blood lead reference level of 5 µg/dl. As noted in the Plan, lead poisoning prevention remains a high priority need and the Department’s funding plans should reflect an emphasis on direct lead hazard reduction and other prevention programs for pre-1978 constructed homes;
   - GHII recommends that the Department continue to maintain lead hazard reduction grant funding and that the Department seek additional funding sources in order to increase the amount of funding allocated to lead hazard reduction grant funding (CDBG, HUD LBPHC, State) and alternative sources for low income residents;
   - The Department should continue its coordination with the Health Departments and insure that all children with elevated blood lead levels of 5 µg/dl or higher are regularly referred to the Department’s lead grant programs for possible lead hazard reduction grant assistance for their property;
   - The Department should work with state and local licensing agencies to assist with improving compliance by contractors with the EPA Renovation, Repair, and Painting Rule by requiring that contractors who are conducting activities covered by the RRP Rule and


which also require a permit to provide proof of RRP Rule firm certification in order to be approved for a permit.

2. **Asthma and Healthy Homes**
   - Asthma remains a severe public health problem in Rhode Island. In 2012, 112,000 Rhode Islanders had asthma and over the period of 2005-2012, the percentages of children and adults with asthma in Rhode Island were higher than the national average. Asthma related emergency room visits in the state have ranged from 60 to 68 visits per 10,000 individuals per year. In 2012, asthma hospitalizations in Rhode Island were about 1,300 (State of Rhode Island Department of Health, Asthma Data). The state’s housing stock contains numerous asthma triggers including among others: mice, rats, roaches, dust mites, mold, and poor indoor air quality that are exacerbating underlying asthma conditions for residents.
   - Home-based environmental health hazards play a significant role in asthma episodes, household injury, and other negative health outcomes. The Department should designate specific Healthy Homes Program funding for asthma trigger reduction interventions and for funding that can address home-based environmental health hazards including among others: mold, asbestos, and radon. The Healthy Homes Program funding should be utilized to pay for housing interventions that meet evidence-based healthy housing standards.
   - 13 million preventable injuries occur annually in the United States costing $222 billion in medical costs. The state’s housing stocks possesses numerous household injury risks. The Department should designate specific Healthy Homes Program funding that can pay for household injury prevention measures such as tripping hazards, slip and fall hazards, fire hazards, and electrical hazards.

3. **Innovative Housing Intervention Model**
   - GHHI strongly recommends that the Department continue the statewide expansion of the Green & Healthy Homes Initiative Rhode Island model of braiding and coordinating resources to improve client service delivery and health outcomes while simultaneously reducing client deferral rates, energy costs and maintenance costs for low income families. Rhode Island Housing has been a key partner in advancing the innovative GHHI model and helping to produce results in Central Falls, Pawtucket, Providence and Woonsocket. In order to achieve a single portal intake process, comprehensive assessment standards and the integration of resources that results in whole house interventions for low-income families in other jurisdictions, the state must expand this process into additional cities and towns in Rhode Island. To better serve any low-income family who seeks housing services from the Department, other state and city agencies, or any local housing provider, the Department must continue to be a leader and build a statewide collaborative that supports the implementation of the GHHI model on the ground in every jurisdiction. To remove barriers that prevent access to various housing programs, it is critical that lead hazard reduction, healthy homes, energy efficiency, weatherization, and rehabilitation programs be integrated through a robust Green & Healthy Homes Initiative Rhode Island process statewide.

4. **Affordable Housing**
   - In order to assist families who have limited income sources but who reside in lead hazardous housing where their children have elevated blood lead levels or are at imminent risk of lead poisoning, GHHI recommends that the Department create a dedicated pool of Housing Choice Voucher Program vouchers that can be accessed to assist families in moving from lead hazardous housing to lead certified or lead free housing. The current list of vouchers in the draft Consolidated Plan does not include vouchers for lead affected families (page 62). GHHI recommends that dedicated vouchers be established that provide a
preference for lead affected families where EBL children reside as well as making vouchers available preventively for children under age 6 with blood lead levels below 5 µg/dl who need to relocate permanently from non-compliant, lead hazardous housing before they are poisoned.

Response

1. Table 57 in Section MA-20 estimates those households with children present that are risk of lead-based paint poisoning due to the age of their home. In total, nearly 54,000 households, 9% of owner-occupied households and 13% of renter-occupied households, include this risk for the children living in those homes. Several other responses to questions in MA-20 also address the risk of lead-based paint exposure to children, including tables 59 and 60. That section also includes information on lead-based paint policies in the state. Section SP-65 Lead based paint Hazards addresses the institutional organization strategies as well as the strategy to advocate for more resources.

2. The LeadSafe Homes Program does include inspections for asthma and completes other healthy homes work besides lead-paint abatement to ensure the home is free of health risks. Often this includes partnering with municipalities, which may have their own healthy homes funding, or with Community Action Programs (CAPs) or with the state’s CDBG program. Tripping hazards, slip and fall hazards and fire hazards are also included in the inspection completed by the LSHP and home health educators from CAPs are trained to work with homeowners on healthier and safer living.

3. The Health homes coordination work underway through the Green and Healthy Homes Initiative Rhode Island is described in PR-10 Consultation, SP-25 Priority Needs, SP-40 Institutional Delivery Structure, SP-45 Goals Summary, SP-65 Lead based paint Hazards and also in AP-85 Other Actions (annual actions planned to address lead-based paint hazards and to develop institutional structure).

4. Priority needs 7 and 8, and the goal to address those needs, Goal 3 – improve the accessibility, health, safety, and energy efficiency of all Rhode Island homes – addresses the concerns of the affordable housing comment. However, their currently is not a program that provides housing vouchers for a family that needs to relocate permanently because of unhealthy housing specifically. The LeadSafe Homes Program (Rhode Island Housing) offers re-housing assistance for families of children hospitalized due to lead poisoning. Rental assistance is an extremely limited resource in Rhode Island that many high need sub-populations compete for, including the homeless, Veterans and victims of domestic violence. Given the very high demand for this limited resource, we do not believe it is appropriate at this time to establish a set-aside or preference for lead-affected families; however, these families do have the same access as other high need populations to this important resource.

Changes to the Report

1. The state is already doing or, as outlined in various sections of the Consolidated Plan, plans to do what is recommended. The state will add the following sentence to SP-65: **Rhode Island Housing will work with The Alliance, the Housing Resources Commission, Rhode Island’s Weatherization Assistance Program agencies, and municipalities to secure additional resources for lead mitigation and continue to improve coordination of resources to meet the broader healthy housing needs of Rhode Island residents.** The following sentence was included in the ‘Conformance with lead hazard mitigation law’ attached text box: **Rhode Island Housing will continue to work with the Housing Resources Commission to ensure that the state’s lead laws are being implemented effectively.**

2. The statistics on Asthma problems in Rhode Island (first bullet under comment 2) was added into the Discussion section of MA-20 Condition of Housing.
3. The Consolidated Plan extensively detailed in its public draft the work and coordination of the Green and Healthy Homes Initiative. The following sentence was added to SP-65 under the question “How are the actions listed integrated…”: The state will continue the statewide expansion of the Green & Healthy Homes Initiative Rhode Island model of braiding and coordinating resources to improve client service delivery and health outcomes while simultaneously reducing client deferral rates, energy costs and maintenance costs for low income families. The state will look to expand this process into additional cities and towns in Rhode Island.

4. No changes made.
PUBLIC NOTICE

PUBLICHEARING.COMMENT PERIOD

STATE OF RHODE ISLAND
CONSORTIUM PLAN, 2015-2019
PUBLIC HEARING

Rhode Island Housing, in collaboration with the Rhode Island Office of Housing and Community Development, is currently updating the 5-year Consolidated Plan for 2015-2019. The Consolidated Plan will identify Rhode Island’s housing needs, strategies, priorities, goals and outcomes for administering housing and community development programs across the state. The Consolidated Plan has two purposes: It serves as:

1. An application to the U.S. Department of Housing and Urban Development (HUD) for funding of the Community Development Block Grant Program (CDBG), HOME Investment Partnerships Program (HOME), and Community Development Block Grant Program (BDG), and;
2. A planning document that sets priorities for allocating funding received through these programs throughout Rhode Island.

A public hearing on the Consolidated Plan for 2015-2019 has been scheduled for:

Wednesday, July 8th, 2015 from 6:00 p.m. to 8:00 p.m.
Rhode Island Department of Environmental Management
235 Promenade St., Providence, RI 02906

To request a language or sign interpreter, please call Rhode Island Housing 48 hours in advance at 401-527-1230. The hearing is accessible to persons with hearing impairments.

At this hearing, Rhode Island Housing will present findings regarding the housing-related conditions of the state, including Census data that show recent changes in the state’s housing needs and the state’s housing market. We will also be discussing potential priorities and strategies to address data needs. We will be accepting feedback on these findings, regional or statewide housing and community development needs, as well as potential priorities and strategies. Public input at the hearing will be used to inform the final Consolidated Plan, which will establish the state’s goals and projected outcomes and resources available for housing, community development and homeless programs in the next five years.

PUBLIC COMMENTS

A draft Consolidated Plan 2015-2019 document will be available for review at www.rihousing.com (Click on Newsroom, Plan Data, Research, and Reports) beginning on July 9. Copies may be requested at Rhode Island Housing during normal business hours, by telephone, mail or e-mail. All comments received by August 6 will be considered for inclusion in the final Plan covering the period March 1, 2015 to February 28, 2019.

For more information or to comment, please contact:

Amy Bacon-Ricci
Rhode Island Housing
44 Washington Street, Providence, RI 02903
(401) 527-1235
aricci@rhodeislandhousing.org

List of locations where copies of the draft proposed Consolidated Plan may be examined:

Providence Public Library
150 Empire St., Providence, RI
Warwick Public Library
600 Sandy Ln., Warwick, RI
Cumberland Public Library
1464 Diamond Hill Road, Cumberland, RI
Westerly Public Library
44 Broad Street, Westerly, RI

Information on the Required Contents of the Consolidated Plan:

Executive Summary: The plan shall contain a concise executive summary that includes the objectives and outcomes identified in the plan as well as an evaluation of past performance.

Process: The state shall describe the land agency or entity responsible for overseeing the development of the plan and the significant aspects of the process by which the consolidated plan was developed.

Housing and Homelessness Needs Assessment: The consolidated plan must provide a concise summary of the state’s estimated housing needs projected for the ensuing five-year period.

Housing Market Analysis: The state shall provide a concise analysis of the housing market.

Strategic Plan: The plan must identify the priority needs of the state and describe strategies that will be used to serve the priority needs.

Plan Action Plan: The state must provide a concise summary of the actions, activities,

1980-93 and returned from Division II New Haven as the program’s top assistant and recruiting coordinator under Foster, who departed for Boston College after the 2014 season. The Rams surprised their Atlantic 10 rivals after being picked 11th in the preseason polls, going 20-25-1 overall and 15-0 in league play. Cer- rato helped URI nearly sweep the conference’s postseason awards, as freshman left- hander Tyler Wilson became the first player in league history to earn Rookie of the Year honors in the same season.

“We have student-athletes and coaches that are truly proud to wear that Rhody uniform, and that might be the thing that means the most to me,” Cer rato said. “I couldn’t be more excited about the future of this program.”

Wilson was joined by North Kingstown native Chris Hess on several fresh- man All-American lists, as the infielder led URI in batting average (.326), hits (59), runs scored (54) and triples (6). Other key returns in 2016 include All-Atlantic 10 selection Martin Tavares and All-Atlantic 10 Championship selections Ryan Olmo and Jordan Powell. Cer rato’s new deal calls for an annual salary of $55,000.

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2015-2019 RHODE ISLAND CONSOLIDATED PLAN – CITIZEN PARTICIPATION COMMENTS

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