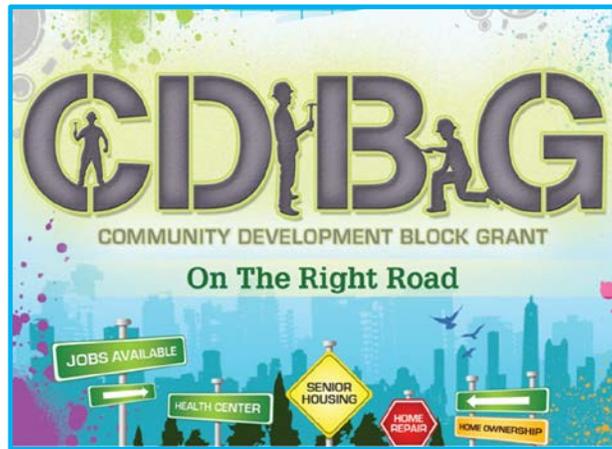


City of Coeur d'Alene, ID

2024 Annual Action Plan

for the

Community Development Block Grant (CDBG) Program



Approved by HUD #07052024 (9/10/2024)

Comment Period 7/6/2024 – 8/6/2024

Prepared by Coeur d'Alene's Planning Department



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Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The Coeur d'Alene 2024 Annual Action Plan (Action Plan) for the City's Fiscal Year 2024 is the second year in the City's 5-Year Consolidated Plan for years 2023-2027 and identifies the allocation of federal funding provided to the City by the U.S. Department of Housing and Urban Development (HUD), through the Community Development Block Grant (CDBG) Program. The purpose of this Action Plan is to identify the goals, strategies, projects, and priorities established by Coeur d'Alene through a combination of research and data analysis, agency and expert consultation, and citizen participation.

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.

This Action Plan focuses on the framework set in the Consolidated Plan of five-year objectives and strategies that the City of Coeur d'Alene will pursue through the application of its federal CDBG program resources, as well as through collaboration with local providers in the network that coordinate the community's system of program and service delivery efforts. Based on research, data analysis, consultation, and citizen participation, this Action Plan furthers the five Consolidated Plan priorities and goals to which the City will focus its resources over the next year:

1. **Maintain and Increase Housing Stock (both ownership and rentals)** – This includes activities that support new housing construction such as acquisition, clearance, and street improvements, rehabilitation of existing housing (ownership) Emergency Minor Home Repair and Assistance Program, rehabilitation of existing housing (rentals), down payment assistance (direct financial assistance to homebuyers), residential historic preservation, etc.
2. **Public Facility and Infrastructure Projects (serving LMI residents)** – This includes acquisition, creation, rehabilitation of public facilities and city facilities, and code enforcement. This includes sidewalks to help make connections, improve ADA accessibility, parks, water/sewer improvements, remediating code enforcement violations, etc.
3. **Public Services (serving LMI residents)** – This includes support for organizations that serve the LMI population in the support of childcare services, mental health services, housing counseling, food banks, health services, legal services, youth services, subsistence assistance, etc.

4. **Homelessness Assistance** – This includes outreach, emergency shelter, rehousing services and homelessness prevention to persons experiencing or at-risk of homelessness.
5. **Economic Development** – This includes job creation/retention, business and technical assistance, microenterprise assistance, rehabilitation of publicly or privately owned commercial/industrial properties, etc.

HUD has identified specific outcomes to be achieved through the allocation of the resources it provides. As part of the City’s annual funding and implementation efforts during the duration of this Action Plan, the primary objectives include enhancing the availability, accessibility, and affordability of housing. Additionally, the Action Plan goals aim to create and/or enhance suitable livable environments that meet the needs of the community by continuing the competitive Community Opportunity Grant program which allows public and private entities to apply for funding for a variety of allowable activities that would benefit LMI persons and households. Providing priority funding to the Lake City Senior Center’s “Meals on Wheels” program each year in the non-competitive grant amount of \$10,000 and is expected to serve approximately 120 homebound seniors. Continue to commit funding to the rehabilitation of affordable housing stock through the Emergency Minor Home Repair and Accessibility Improvement Program (EMRAP), specifically designed for low- and moderate-income (LMI) homeowners. The City of Coeur d’Alene is dedicated to supporting and advancing initiatives that benefit both low-to-moderate income (LMI) residents and all of its citizens. The City actively promotes education and outreach to create a strong, involved, and engaged population who want to contribute to community betterment. Furthermore, the City hopes for consistent growth of the CDBG program with widespread benefits through leveraging increased stakeholder participation, innovative proposals, and strategic partnerships. By maximizing HUD funds, the program aims to address the needs of community members who are the most vulnerable and at-risk.

3. Evaluation of past performance

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

The goals and projects identified in this Action Plan represent both a continuation and an evolution of the goals that have been included in the City’s Consolidated Plans since it became a CDBG entitlement community. Addressing the community’s needs for affordable housing, principally for households with very low and extremely low incomes, has been a priority goal in the Consolidated Plan since the program’s inception. Due to increased housing costs and the resulting cost burdens for these households continuing to worsen in recent years, goals to create new affordable housing opportunities, and to maintain the quality of affordable units that currently exist, are being carried forward in the 5-year Consolidated Plan period.

Over time, the City’s previous Consolidated Plans have consistently emphasized the importance of meeting the needs of low-income and special-needs populations. This focus has primarily manifested through the allocation of housing assistance grants and bolstering social services. However, as housing affordability has declined in recent years, the existing public and private resources available to support individuals with low incomes and special needs have not kept pace.

Consequently, a widening gap exists in programs and services aimed at fulfilling community needs. In light of this ongoing trend, the Action Plan will continue its commitment to providing essential resources to address these critical needs.

In looking at past performance, the City was able to meet goals 1 & 3 as follows:

- a) **Maintain and Increase Housing Stock:** Provided assistance to five (5) LMI households with the City's EMRAP program which included bathroom rehabilitation, sewer main replacement, window replacement, new furnace, and repair of roof leaks, new fascia and gutters. The City anticipates assisting 2-5 additional households by the end of the plan year.
- b) **Public Service goal:** Supported Lake City Senior Center's "Meals on Wheels" program with a \$10,000 award.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The City released a Notice of Funding Availability (NOFA) on May 10, and 24, of 2024, for the Community Opportunity Grant for Plan Year 2023 (reopened) & 2024. A public workshop was held on June 6, 2024, at 4:00pm at City Hall. The City released a Notice of the 2024 AAP Public Forum, Comment Period, and Public Hearing on June 14, and 28, 2024. The Public Forum was held at City Hall on June 28, 2024, at 12:00pm (Noon). A public hearing will be held August 6, 2024, at 6:00 pm at the Coeur d'Alene Library Community Room located at 710 E Mullan Ave., Coeur d'Alene, ID 83814.

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.

Public comments were received and are supportive of the City's Annual Action Plan goals and proposed projects for Plan Year 2024.

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

One comment was received which was not in support of Federal block grant money in general. The commenter stated it was borrowed money coming from a government already 34 trillion dollars in debt. The comment was not accepted as it did not specifically address items in the City's draft Annual Action Plan.

7. Summary

The City of Coeur d'Alene has formulated an Action Plan that encompasses various strategies and resources to address the community's recognized needs. As outlined in this Action Plan, the city's initiatives will prioritize the creation, preservation, and maintenance of affordable housing opportunities. Furthermore, concerted efforts will be directed at addressing homelessness proactively and supporting the unique needs of low-income and special-needs populations.

This document signifies a collaborative effort involving coordinated planning and active citizen participation. Its primary goals include streamlining efforts at the local level to prevent redundancy and enhance service delivery. It allows community organizations, citizens, and developers to better grasp the context in which the City's CDBG program operates. With this valuable tool, stakeholders are better able to shape various programs into effective and harmonized regional, local, community, and neighborhood strategies over the next year. This Action Plan aims to foster and expand opportunities for all Coeur d'Alene residents, particularly those who encounter additional challenges related to income, health, or special needs.

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

1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity 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	COEUR D'ALENE	
CDBG Administrator	COEUR D'ALENE	Planning Department
HOPWA Administrator		
HOME Administrator		
HOPWA-C Administrator		

Table 1 – Responsible Agencies

Narrative (optional)

The City of Coeur d'Alene has a full-time employee that administers the City's CDBG program and oversaw the preparation of the Action Plan.

Consolidated Plan Public Contact Information

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AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

The development of the Action Plan placed significant emphasis on community input. Throughout the process, one hundred and seventy (170) organizations and stakeholders were actively engaged. The City collaborated closely with organizations that support special needs and low-income populations, including Lake City Senior Center, St. Vincent de Paul, Safe Passage, CDAIDE, Union Gospel Mission, Coeur d'Alene Economic Development Corporation, Human Rights Education Institute, and Specialized Needs Recreation. To gather even broader perspectives, a community survey was distributed via email to all agencies on our stakeholder list and was also shared on social media, the City's website, and in the local newspaper. During the 30-day public comment period, the public hearing was advertised twice in the press, on the City's website, social media channels and CDATV (the City's Public Education and Government Channel). Additionally, the Action Plan was made available for physical review at City Hall. The City also facilitated forums and workshops as described below.

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 City held a public workshop for the Notice of Funding Availability for the Community Opportunity Grant program for Plan Year 2023 (which was reopened) & for Plan Year 2024 funds. A public forum was held on June 28, 2024, in preparation of the Action Plan in order to gather information regarding the City's greatest housing and community development needs, and the needs of special populations. The public forum helped to identify potential gaps not being met, and confirmed the goals proposed in the Action Plan were in alignment with the needs of the community. The City also conducted a survey to gather community input on the biggest needs and priorities for funding. The survey was of the community-at-large.

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.

The Region I Homeless Coalition, headed by St. Vincent de Paul, spans all five (5) counties of North Idaho. The City actively participates in their meetings to enhance awareness and coordination in addressing the needs of homeless individuals and those at risk of homelessness within Coeur d'Alene. The City includes this group on its stakeholder list and routinely shares information about funding availability, actively seeking opportunities for collaboration.

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

St. Vincent de Paul of North Idaho receives and allocates Emergency Shelter Grant (ESG) funds. The City does not develop performance standards, evaluate outcomes, or develop funding policies and procedures for the administration of HMIS, as it does not administer HMIS. St. Vincent de Paul North Idaho does comply with CoC and ESG programs in a close working relationship with the Idaho Housing and Finance Association/HUD, while adhering to strict confidential HMIS use and guidelines.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	ST. VINCENT DE PAUL
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-Homeless Services-Employment
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans 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?	Consultation during public workshops, via emails, and through site visits. Actively encouraged participation in the community-wide survey. Housing remains a critical priority within the community. Sustained collaboration with St. Vincent is essential to effectively address homelessness needs, facilitate rapid rehousing, and implement emergency housing solutions.
2	Agency/Group/Organization	LAKE CITY SENIOR CENTER
	Agency/Group/Organization Type	Services-Elderly Persons Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	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?	Lake City Senior Center works closely with the City and the CDBG program. They have been awarded several grants aimed at supporting low-income elderly shut-in seniors.
3	Agency/Group/Organization	CDAIDE
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was addressed by Consultation?	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?	CDAIDE collaborates closely with the City and the CDBG program. They have been awarded several grants aimed at housing and utility subsistence, specifically benefiting hospitality workers in our community. Our interactions with CDAIDE have included numerous one-on-one phone calls, active participation in our workshops and forums, as well as valuable input through surveys regarding the housing needs within the hospitality industry.
4	Agency/Group/Organization	INTERMAX
	Agency/Group/Organization Type	Services - Broadband Internet Service Providers
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City notifies the stakeholder list of opportunities to provide comments on the Annual Action Plan. The stakeholder list is also notified of grant opportunities through the annual Community Opportunity Grant program. Local broadband providers include Intermax, Spectrum, TDS, Zply, and Fatbeam. The City will continue to reach out to this group to see if there are opportunities to expand broadband access for LMI community members.

5	Agency/Group/Organization	KOOTENAI COUNTY
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	Transit and Emergency Management
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Kootenai County is part of the City's stakeholder list. They are notified of opportunities to comment on the plans, and they receive Notice of Funding for the annual community opportunity grants. County staff and City staff regularly communicate on transit planning efforts and City staff from the Fire and Planning Departments participate in the All-Hazard Mitigation Plan. The Fire and Police Departments also work closely with the Sheriff's office and Office of Emergency Management.
6	Agency/Group/Organization	COEUR D'ALENE REGIONAL CHAMBER
	Agency/Group/Organization Type	Business Leaders Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Coeur d'Alene Regional Chamber is on the City's stakeholder list. The Chamber shares the perspective of the business community and provides critical information on the needs of the workforce and service section related to housing and economic development opportunities.
7	Agency/Group/Organization	COEUR D'ALENE SCHOOL DISTRICT
	Agency/Group/Organization Type	Services-Children Services-Education Major Employer

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The School District was consulted to gather current data related to households with children under 18. The City works with the School District on a regular basis on community initiatives.
8	Agency/Group/Organization	IDAHO HOUSING AND FINANCE ASSOCIATION
	Agency/Group/Organization Type	Services - Housing Other government - State
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	IHFA was consulted to obtain up-to-date information on public housing, housing vouchers, affordable units, and related data. IHFA participates with the City to address housing needs in the region.
9	Agency/Group/Organization	UNION GOSPEL MISSION
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children 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?	Consultation during public workshops, via emails, and actively encouraged participation in the community-wide survey.
10	Agency/Group/Organization	SAFE PASSAGE
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Victims of Domestic Violence Services-homeless Services-Health
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation during public workshops, via emails, and through site visits. Actively encouraged participation in the community-wide survey.
11	Agency/Group/Organization	HUMAN RIGHTS EDUCATION INSTITUTE
	Agency/Group/Organization Type	Services-Children Services-homeless Services-Education
	What section of the Plan was addressed by Consultation?	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?	Consultation during public workshops, via emails, and actively encouraged participation in the community-wide survey.

12	Agency/Group/Organization	SPECIALIZED NEEDS RECREATION
	Agency/Group/Organization Type	Services-Children Services-Persons with Disabilities Services-Education
	What section of the Plan was addressed by Consultation?	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?	Consultation during public workshops, via emails, and actively encouraged participation in the community-wide survey.

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

The City reached out to 170 agencies and organizations within the local jurisdiction. It is unknown if there are any other agency types that were not notified or 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	St. Vincent de Paul	There are no other plans.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

Each agency or organization was initially contacted through email for consultation and coordination and encouraged to complete the community survey. Several organizations were consulted more in depth for information regarding specific information on homeless, non-homeless special needs, economic development, and housing problems. Anticipated outcomes include solidifying existing partnerships for increasing affordable housing stock, fill in gaps with homeless and special needs populations, improving existing housing stock with common housing problems with the Emergency Minor Home Repair and Accessibility Program, and gaining additional partnerships in workforce development in areas of job training and LMI Entrepreneurs for the Community Opportunity Grant.

AP-12 Participation – 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

The Action Plan underwent development with a significant focus on community engagement. The City's Public Education and Government Channel disseminated advertisements explaining the Action Plan's objectives and ways for citizens to participate. A public survey was distributed via email to 170 relevant organizations and stakeholders spanning areas such as economic development, education, financial institutions, City and County government, service providers, housing agencies, disability advocates, and real estate development. Information about the Action Plan was prominently featured on the City's web page, social media, and was advertised twice in the press to promote both the public forums and the survey. The public forum was held on June 28, 2024, and the survey was available for participation through July 26, 2024. The City adhered to its Citizen Participation Plan, posting a notice in the Coeur d'Alene Press. The City also utilized its Facebook page, website, and stakeholder email list to disseminate information about the notice. The general consensus of the participants included the five (5) proposed goals listed in the survey, with an emphasis on maintaining affordable housing, public facility improvements, and services for youth and seniors.

A public hearing is set for August 6, 2024 to finalize and hear any further comments on the Action Plan.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Public Meeting	Non-targeted/broad community	One public meeting was held. The information we were able to provide was helpful to those in attendance. Although attendance was low, it allowed us to answer the questions about the process and provide education on the overall program.	No Comments were received.	Any and all comments would have been accepted if any had been received.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Newspaper Ad	Non-targeted/broad community	The City ran two newspaper ads regarding the public forum, public comment period, and public hearing. There was a previous newspaper ad for the Notice of Funding and corresponding workshop.	No comments were received directly as a result of the ads, yet survey responses were received and attributed to the result of placing the ads.	No comments were received directly as a result of the ads, therefore, no comments were not accepted.	
3	Public Hearing	Non-targeted/broad community	Public Hearing to receive public comments was held on August 6, 2024, at 6:00 p.m. with multiple community members present.	The comments received were supportive of the CDBG program and supportive of the City's Annual Action Plan goals and proposed projects.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Internet Outreach	Non-targeted/broad community	The City advertised the Annual Action Plan Community Forum, Survey, and Public Hearing with Comment Period via City Facebook, City Twitter, and City website notifications, as well as the City's local TV channel. We believe these methods increased survey responses and viewing of the public hearing, specifically those not overly familiar with CDBG grant information.	One comment was received which was not in support of the Federal block grant in general.	The one comment was not accepted as it was not specific to the City's draft Annual Action Plan.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	Direct Outreach	Non-targeted/broad community	Coordination with St. Vincent de Paul to gather relevant data and input regarding homelessness services, veterans' services and other services provided through their programs.	We received valuable feedback and data from St. Vincent de Paul which is included in this Plan.	All comments were included.	

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

The City of Coeur d'Alene does not have any anticipated resources at its disposal for the Action Plan, other than CDBG funding.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	296,418	0	0	296,418	889,254	

Table 5 - 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

The City of Coeur d'Alene receives no federal funding in addition to CDBG for housing and non-housing community development and there are no matching requirements for the City's CDBG program. IHFA is the Public Housing Authority (PHA) for the region and administers the Section 8 program. . IHFA is the Public Housing Authority (PHA) for the region and administers the Section 8 program. The estimated amount available to assist households through the Section 8 Housing Choice Voucher Program during Plan Year 2021, based on 2020 data provided by the IHFA is approximately \$3,071,588 in the City of Coeur d'Alene and approximately \$6,189,729 for the Coeur d'Alene Region under the Project-Based Section 8 Program. Of those assisted with the Choice Voucher Program, 618 families were assisted in the City of Coeur d'Alene, with 1,262 families being assisted in the greater Coeur d'Alene Region. Although the City of Coeur d'Alene is not a direct recipient of any IHFA funding/grants, the projected amount of funding for the Coeur d'Alene area is approximately \$3,500,000 through Supportive Housing Program (SHP) and Emergency Shelter Grants (ESG), including Community Housing Development Organization (CHDO) funding and Homelessness Prevention and Rapid Re-housing (HPRP) grants. These funds are managed by St. Vincent de Paul as the recipient of IHFA funding for north Idaho and they have assisted over 2,050 individuals into housing with these funds within Kootenai County annually. The Helping Empower Local People (H.E.L.P.) Center, a one-stop-shop, in Coeur d'Alene is the focal point for outreach and service to individuals and families seeking assistance.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

No, the City does not have any current land available that would be able to address the needs identified in this Action Plan at this time.

Discussion

Additional resources from private, state and local funds will be leveraged as opportunities arise for the City to partner with in order to further each goal in this Action Plan.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable For Sale and For Rent Housing	2023	2027	Affordable Housing	LMI Census areas	Owner Occupied Housing Rehabilitation	CDBG: \$141,491	Homeowner Housing Rehabilitated: 12 Household Housing Unit
2	Public Facility and Infrastructure Projects	2023	2027	Non-Housing Community Development	LMI Census areas	Public Facilities Rehabilitation Homelessness Assistance	CDBG: \$51,182	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 50 Persons Assisted Homeless Person Overnight Shelter: 20 Persons Assisted
3	Public Services	2023	2027	Non-Homeless Special Needs Non-Housing Community Development	LMI Census areas	Healthcare Services Mental Health Services	CDBG: \$44,462	Public service activities other than Low/Moderate Income Housing Benefit: 130 Persons Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Affordable For Sale and For Rent Housing
	Goal Description	Activities that support new housing construction (ownership) such as acquisition, clearance, and street improvements such as lighting, safety, ADA improvements, and water and sewer improvements, design and engineering for new construction of affordable housing, rehabilitation of existing housing for LMI homeowners (EMRAP program), down payment assistance – direct financial assistance to homebuyers, residential historic preservation, etc. For information on the city's EMRAP program visit: https://www.cdavid.org/236/departments/planning/cdbg/emrap
2	Goal Name	Public Facility and Infrastructure Projects
	Goal Description	Acquisition, creation, and rehabilitation of public facilities, city facilities, and code enforcement. This includes sidewalks to help make connections, improvement to ADA accessibility, parks, water/sewer improvements, and remediating code enforcement violations.
3	Goal Name	Public Services
	Goal Description	This includes support for organizations that serve the LMI population in the support of childcare services, mental health services, housing counseling, food banks, health services, legal services, youth services, subsistence assistance, etc. For 2024 funds, the public service would support other Public Service projects estimated at \$44,462.00.

Projects

AP-35 Projects – 91.220(d)

Introduction

In response to popular demand, the City of Coeur d’Alene foresees the continuation of its Emergency Minor Home Repair & Accessibility Program (with an increased grant allocation to \$141,491.00 and corresponding grant awards now ranging from \$5,000 for general repairs, \$10,000 for re-roofing, and up to \$20,000 for sewer main replacement/connection), and the Community Opportunity Grant program which permits a diverse range of eligible proposals for HUD-approved activities. These activities, including public service activities, often address critical gaps within our local Continuum of Care. Despite the 15% cap on public service activities relative to the annual HUD funds allocation, the City is eager to provide essential services to its LMI residents. Plan Year 2024 projects include General Administration, Emergency Minor Home Repair and Accessibility Program, Meals on Wheels, Childcare Scholarships, and Public Facility Rehabilitation at two local non-profit facilities.

Projects

#	Project Name
1	General Administration
2	Emergency Minor Home Repair and Accessibility Program
3	Meals on Wheels
4	Childcare Scholarships
5	Public Facility Rehabilitation

Table 7 - Project Information

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

As the housing deficit increases, affordable housing issues continue to increase, creating an even greater need to fund projects that support affordable housing activities. The EMRAP program will continue, and Meals on Wheels is an annual grant that supports low-income seniors who are homebound or disabled.

AP-38 Project Summary
Project Summary Information

1	Project Name	GENERAL ADMINISTRATION
	Target Area	LMI Census areas
	Goals Supported	Affordable For Sale and For Rent Housing Public Facility and Infrastructure Projects Public Services
	Needs Addressed	Owner Occupied Housing Rehabilitation Public Facilities Rehabilitation
	Funding	CDBG: \$59,283
	Description	General Administration activities include payroll for a CDBG Administrator to manage everyday administration of the grant, sub-recipient monitoring, and reporting requirements such as the Annual Action Plan, Consolidated Plan, and CAPER. Tasks are varied but can include Davis-Bacon monitoring, contract review, public information management, and ongoing community engagement involved with running and reporting on CDBG programs. This General Administration fund includes CDBG related administration costs including advertisements, training costs, and printing as well as all Fair Housing support. Additionally, some of the Administration funds will be used to help update the Analysis of Impediments and conduct a Housing Assessment for Coeur d'Alene.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Payroll for CDBG Grant Administrator, project delivery, subrecipient management/monitoring, EMRAP program management, supplies, advertisements, training, brochures.
2	Project Name	EMERGENCY MINOR HOME REPAIR AND ACCESSIBILITY PROGRAM
	Target Area	LMI Census areas
	Goals Supported	Affordable For Sale and For Rent Housing
	Needs Addressed	Owner Occupied Housing Rehabilitation
	Funding	CDBG: \$141,491

	Description	This program provides emergency housing repairs or ADA accessibility improvements to single family dwellings. Projects may include roofing replacement or repair, furnace replacement, electrical repair, hot water heater replacement, ADA sidewalk improvements or grab- bars/levers, and weatherization. This program is designated for CDA LMI homeowners of single-family dwellings. It would also include allowable Program Delivery costs for City staff to administer the program.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Between 12 and 18 LMI households are expected to benefit from the EMRAP program.
	Location Description	All qualifying LMI families living in owner-occupied residential single- family dwellings within Coeur d'Alene City limits are eligible for this program. All locations are deemed eligible within City of Coeur d'Alene limits.
	Planned Activities	The program provides for grant funds for emergency repair, accessibility improvements, and other minor repairs that relate to the correction of hazardous building conditions that threaten the health and safety of the homeowner or the soundness of their home.
3	Project Name	MEALS ON WHEELS
	Target Area	LMI Census areas
	Goals Supported	Public Services
	Needs Addressed	Healthcare Services
	Funding	CDBG: \$10,000
	Description	This represents an annual non-competitive allocation to the Lake City Center's "Meals on Wheels" Program, which serves at-risk seniors. As per the City Council's directive, this funding will be renewed yearly, subject to need and citizen approval. Importantly, this allocation contributes to the 15% public service cap.
	Target Date	9/30/2025

	Estimate the number and type of families that will benefit from the proposed activities	99 shut-in seniors with disabilities, based on prior year (2023) reports and funding, are estimated to benefit from this activity.
	Location Description	The great majority of seniors served in this program are Coeur d'Alene residents. All locations within the City are eligible.
	Planned Activities	One non-competitive grant of \$10,000 is planned to support costs for one month's worth of food reimbursement for the "Meals on Wheels" program serving shut-in seniors.
4	Project Name	CHILDCARE SCHOLARSHIPS
	Target Area	LMI Census areas
	Goals Supported	Public Services
	Needs Addressed	Healthcare Services Mental Health Services
	Funding	CDBG: \$34,462
	Description	Public Service funds targeted to support short-term childcare subsistence activities.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	We estimate up to 30 individuals and their dependents will benefit from these activities. This will benefit LMI families who are in need of childcare subsistence which will support households in maintaining housing stability.
	Location Description	
	Planned Activities	United Way of North Idaho will support families through this activity by providing childcare subsistence within the City's LMI population.
5	Project Name	PUBLIC FACILITY REHABILITATION
	Target Area	LMI Census areas
	Goals Supported	Public Facility and Infrastructure Projects
	Needs Addressed	Public Facilities Rehabilitation Homelessness Assistance
	Funding	CDBG: \$51,182

Description	Public Facilities Rehabilitation projects including restroom rehab, roofing projects and other public facilities improvement activities. Funds are awarded via our Community Opportunity Grant process.
Target Date	9/30/2025
Estimate the number and type of families that will benefit from the proposed activities	The 2024 CDBG funds for Public Facilities Rehabilitation will assist the community partners with rehabilitation of facilities serving the LMI, Homeless, and Special Needs populations.
Location Description	Public Facilities located in the City of Coeur d'Alene.
Planned Activities	Public Facility Rehabilitation: Tear off and Reroof Safe Passage's domestic violence confidential safe house and remodel of safehouse's kitchen area. Water connection, A/C unit, and IT server upgrade at Tesh, Inc.'s special needs facility.

AP-50 Geographic Distribution – 91.220(f)

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

The City of Coeur d’Alene, Idaho is located on the north shore of Lake Coeur d’Alene and extends north to Hayden. The eastern portion of Coeur d’Alene is bordered by the jurisdictions of Fernan Lake and Dalton Gardens, which have autonomous governing bodies, but share a zip code with Coeur d’Alene. To the west are the cities of Huetter and Post Falls.

The City of Coeur d’Alene does not have significant, dense areas of low-income residents nor are there areas of racial/minority concentration; the total minority population (2020 census report <https://www.census.gov/quickfacts/coeurdaleneidaho>) is 6.6%. The City of Coeur d’Alene uses Census Tract mapping when conducting planning activities for projects under the CDBG Entitlement program (for example sidewalk repair/replacement).

The funds will be distributed throughout the City depending on the organizations seeking assistance for public facilities and public services, as well as emergency minor home repair and economic development activities benefiting LMI community members. Otherwise, site specific public improvements such as sidewalks would only take place in LMI Census Tracts. The City of Coeur d’Alene uses Census Tract mapping when conducting planning activities for projects under the CDBG Entitlement program (for example sidewalk repair/replacement).

Geographic Distribution

Target Area	Percentage of Funds
LMI Census areas	
Sidewalk Improvement Program	

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City’s planning is focused more on the number of persons who can be helped and identifying projects that will produce the best benefit for the investment. There are no target areas identified for PY 2024.

Discussion

The City remains committed to seeking out ways to support our low- and moderate-income (LMI) residents. Our ongoing collaboration with local non-profit organizations, dedicated to assisting those most in need within our community, will continue.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

According to IHFA data from their Regional Affordable Project Listing 2023, there are 13 multifamily housing projects funded by Tax Credits, seven (7) multifamily housing projects funded by a combination of Tax Credits and HOME, and five (5) multifamily housing projects funded by HOME funds. In total, there are 1,223 affordable multifamily units. Of those, 448 are for Elderly/Senior and 13 are for Disabled community members. There is one (1) project with permanent supporting housing units in the Hudson Way project in Coeur d'Alene. Additionally, there are five (5) HUD subsidized housing projects in Coeur d'Alene funded through Section 8 that total 302 units. Of those, 223 units are for Elderly community members. According to the National Housing Preservation Database, in 2023 there are 1,853 affordable housing units in Coeur d'Alene.

The City has allocated \$141,491 to support affordable housing activities in PY 2024. As noted previously, the anticipated projects to receive funding would be for the EMRAP rehabilitation project that typically funds 12-18 households per year and helps retain existing affordable housing stock in the community.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	12
Special-Needs	0
Total	12

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	12
Acquisition of Existing Units	0
Total	12

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

Habitat for Humanity of North Idaho has, in past years, used CDBG funds for constructing infrastructure to support a four-unit housing development in mid-town Coeur d'Alene. The first of the housing units were occupied during the 2010 calendar year, the second in 2011, the third in 2012, and the fourth in 2013. Providing homes for purchase by low/mod income persons is a goal of the City, but one that takes more time and resources than other City goals. Community funding

support is available annually through the City's annual Community Opportunity Grant cycle.

With the 2020 grant funds, Habitat for Humanity of North Idaho began the planning phase of a community land trust project for 20 units of affordable for-sale housing. Future year CDBG funds could assist the homebuyers in the Habitat for Humanity project with downpayment assistance.

The City manages an Emergency Minor Home Repair and Accessibility Program (EMRAP) with CDBG funds which provides emergency supportive rehabilitation for homes in structural distress. Repairs for eligible homeowners provide sustained affordable housing for low-to-moderate income residents of Coeur d'Alene who face difficulty correcting emergent home repairs.

These are two examples of significant positive impacts effected by the contribution that CDBG funds for housing in our community.

AP-60 Public Housing – 91.220(h)

Introduction

The City of Coeur d'Alene does not oversee a PHA and there are no public housing units in the City.

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

IHFA serves the housing needs of the Idaho Panhandle, including the City of Coeur d'Alene. IHFA has an established system for providing service which is well received within the region. IHFA administers the Section 8 program in the City of Coeur d'Alene. During 2023, IHFA oversaw 3,490 affordable housing units in Region 1. The Section 8 Housing Choice Voucher program provided \$3,071,588 in vouchers to 618 families in the City of Coeur d'Alene. There are currently 535 housing vouchers in use, with an expected wait time of 26-28 months.

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

The City of Coeur d'Alene has partnered with Habitat for Humanity of North Idaho on past projects supporting new home ownership opportunities and will continue to look for avenues of continued partnerships with them and all others. With PY 2020 funds, Habitat for Humanity began a 20-unit project of affordable for sale housing in Coeur d'Alene, as noted above, that will be part of a land trust with townhouse ownership units. This project should be completed by the end of 2024.

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

Since there is no Public Housing Authority in the City of Coeur d'Alene, the City defers to IHFA for use of Section 8 Vouchers.

Discussion

The City continues to consider all partnership opportunities that may arise with local and statewide agencies for affordable housing projects within the city limits of Coeur d'Alene for LMI residents.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The City receives no funding beyond their CDBG Entitlement for the homelessness activities. St. Vincent de Paul North Idaho (SVDP) distributes IHFA / HUD funding through the CoC and ESG programs. During 2023, SVDP provided 29,618 services to low-to-no income individuals. The agency saw a notable rise in the number of ALICE (Asset Limited Income Constrained Employed) individuals and families in need of assistance. Much of this trend was due to the rising costs of housing in the area.

Services provided to community members include Emergency Shelters for Men, and Women & Children, a Winter Warming Shelter, a Community Dining Hall, Laundry and Shower facilities, Case Management and Resource Referrals, Homeless Prevention, Rapid Re-Housing, Parenting Classes, Payee Services, Veterans Services and offering over 300-units of low-income housing, serving the elderly and/or people with physical disabilities and mental health challenges. St. Vincent de Paul North Idaho and the National Alliance for Mental Illness (NAMI) CDA hold an annual Housing Resource Fair, where numerous local nonprofits host resource tables at a City Park. NAMI CDA also rents a cubicle at the St Vincent de Paul H.E.L.P. Center, providing a physical presence for those seeking mental health help while visiting a St. Vincent case manager.

PY 2024 Community Opportunity Grant applications were encouraged to include housing, health, social services, employment, education, youth needs, as well targeted support for homeless individuals and families who are being discharged from publicly funded institutions and systems of care and those who are receiving assistance from public or private agencies.

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

SVDP operates numerous programs to help reduce homelessness. In 2023, they housed 216 individuals in their emergency shelters for a total of 6,738 bed nights. Their Angel Arms, Healing Hearts, and First Step programs house people who were formerly homeless. In 2023, these programs provided 44 beds for a total of 37,452 bed nights.

The SVDP Winter Warming Shelter, which is designed to steer the chronically homeless to case management programs and help secure housing, was open 68 nights, providing 1,053 bed nights.

The agency registered 426 people through their Homeless Connect program (which is a 100% increase since 2021), also a function originating from the SVDP HELP Center, which is a designated HUD EnVision Center. The Homeless Connect program is a first step for the homeless population of Region 1 to find housing and during the last year, case managers assisted 55 people who obtained housing or remained housed.

Additionally, SVDP has assistance programs for utility payments, ID cards, computer use, providing a mailing address, and basic needs such as hygiene items, diapers, clothing vouchers, food and pet pantry, etc.

Homelessness is a chronic problem and may never be totally eliminated. Some barriers to ending homelessness such as poor and non-existent housing stock and lack of jobs can be addressed by local governments, though correcting these problems are not quick, easy, or inexpensive fixes. Barriers created or exacerbated by homeless individuals are varied, as are the methods to mitigate barriers. Lack of education, job training and financial management skills can be provided through government-funded programs; the success of those efforts is unpredictable and not always permanent, and dependent upon a certain level of commitment by the homeless individual. Barriers involving health and mental health issues require different, and often more expensive resources, and a greater commitment to change by the homeless person.

Plans and programs can provide resources, encouragement, even a system of rewards or punishments, but no single solution will work for everyone. The City and other partners will concentrate their efforts on helping as many persons as possible, using all resources at their disposal. The City and partner agencies intend to work with and include citizens who are homeless and/or have been homeless to find and address gaps in the system.

The City operates an annual Community Opportunity Grant which allows for our partner agencies and key stakeholders that serve our homeless population or precariously housed population to submit applications to meet the highest needs of those populations.

Currently, the majority of students in the Coeur d'Alene School District's Middle and High School qualified for the McKinney-Vento (homeless) program. The School District has taken steps to assist families in need; working toward removing barriers to education caused by homelessness and poverty.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City works with local organizations such as St. Vincent de Paul North Idaho, IHFA, and the Region 1 Homeless Coalition (Continuum of Care) and other government and non-profit organizations to identify areas of need and appropriate activities to mitigate the problems as resources allow.

For persons experiencing homelessness and women who are domestic violence survivors, there are five (5) emergency shelters in the County to assist them: Children's Village, St. Vincent de Paul North Idaho Women's & Children's Shelter, St. Vincent de Paul North Idaho Men's Shelter, Safe Passage, and the OASIS Domestic Violence program of the Post Falls Police Department (which is the only emergency shelter located outside of Coeur d'Alene). Together, these shelters provide beds to 68 people in need of housing because they are homeless. St. Vincent de Paul North Idaho provides a Warming Shelter that is activated November 1 through April 1, open only when temperatures fall below 28 degrees. When activated, the SVDP Warming Shelter will be open from 7:00pm-7:00am. This shelter is able to accommodate 60 individuals and will have available sleeping bags, blankets, gloves, stocking caps, coats, a commode with sink, warm food and drinks.

Family Promise of North Idaho acts as an interfaith effort to assist homeless families achieve independence. The focus of Family Promise is to keep families together by allowing them to sleep in one of seventeen local host churches, for a week at a time for up to 90 days. Families receive

support services, food, and a temporary safe place to sleep.

The Kootenai County Recovery Center provides a drop-in facility for the homeless and mentally ill to clean up and receive clothes and food. They also offer computers with internet connection to facilitate job searches and communication with family and other support systems. A mail drop address is provided to further the communication support services they offer.

Union Gospel Mission (UGM) is a faith-based organization out of Spokane, WA that supports women in need in Coeur d'Alene. They offer a long-term residential recovery center for women with children and women with substance abuse problems. It is located in uptown Coeur d'Alene and the City granted a special use permit to change from a residential zoning to better facilitate their expansion. Short-term emergency help is also available on a limited basis. Food, shelter, clothing, one-on-one and group therapy sessions, life-skills classes, and a medical clinic are some of the resources they offer. On average, 76 women and 46 children are served each year.

The City feels that it can support homeless persons or precariously housed persons best by increasing the capacity of the area's service organizations. Area agencies are welcome to apply for funding each year and are regularly contacted to discuss possible projects which require long-range planning. The City understands that it has residents who are homeless or precariously housed and plans to support these populations by providing area organizations opportunity to apply competitively for funding based on need and eligibility to meet housing, health, social services, employment education and youth needs.

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

St. Vincent de Paul North Idaho has been tracking accomplishments in two (2) categories: Homeless Prevention and Rapid Re-housing. Under the Homeless Prevention Program and Rapid Rehousing Program from 1-1-23 to 12-31-23, 55 people were served. These programs also provide intensive weekly case management, which begins with a self-sufficiency plan that includes job training services, substance abuse counseling, Life Skills classes, parenting classes and Financial Literacy classes.

The Angel Arms, Healing Hearts, and First Step programs provide housing for those formerly homeless. Case Management and regular house inspections are program requirements. In 2023, these programs provided 44 beds to people who would otherwise have been homeless. Services rendered that utilize IHFA funding are closely monitored and recorded in the federally mandated, confidential client HMIS system; a CRM tool with robust client management and data tracking capabilities with strict sharing proficiencies between authorized local agencies receiving federal funding.

The Community Opportunity Grant can be a resource to agencies such as St. Vincent de Paul North Idaho whereby urgent needs can be addressed with qualifying HUD projects to prevent and/or support homeless individuals and families. Annually, the City's CDBG staff hosts an Annual Action Plan Public Forum and survey in order to collect information on rising trends. These trends help shape CDBG funding dispersal by anticipating high-level community needs.

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 one-stop-shop concept of the HELP Center became a reality in 2009 and continues to assist a majority of people in need throughout the county. It is the Access Point (point of entry) site for most homelessness services in Coeur d'Alene and Region 1 that provided 29,618 services in 2023. From rental assistance to job searching, the HELP Center provides 23 different programs and a multitude of services under each of these programs. Last year 20,727 individuals visited the HELP Center, 14,092 meals were served at Father Bill's Community Kitchen, 1,675 community members used the shower and laundry facilities and over 600 people were housed in SVDP North Idaho facilities.

The City collaborates with St. Vincent de Paul North Idaho several times each year to understand potential service improvements and is aware of the housing difficulty residents face when being discharged from publicly funded institutions and systems of care. The City does not want to replicate services for individuals and families being discharged from publicly funded institutions and systems of care but instead wishes to support area agencies who currently support these populations. The City will continue to educate area agencies on opportunities for them to apply for funding through the City's CDBG Community Opportunity Grant.

Discussion

The Region 1 Coalition for the Homeless (Continuum of Care) and their associated network is always looking to provide those in need with housing, regardless of their history, and ways to add "beds" to the community. There are a myriad of supportive services in the community managed by other organizations for the non-homeless special needs populations. One of the opportunities under the Public Service goal is to partner with organizations that serve the non-homeless special needs populations in the community. As projects arise, it is possible that the City can leverage funding to better serve individuals and families who are being discharged from publicly funded institutions and systems of care as well as those who receive assistance from public or private agencies.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

Affordable housing units exist within the city limits, yet as is the case in most cities, there is always room for more. The City of Coeur d'Alene actively promotes and champions affordable housing by seeking partnerships to expand the housing supply. Moving forward, the city intends to persistently employ effective methods, similar to those used in the past, where CDBG funds are strategically leveraged to maximize the return on investment. An example of this method is evidenced by projects such as a former partnership with Whitewater Creek, Inc. for the Riverstone Apartments where \$10,000 in CDBG funding was used for architectural and engineering costs leveraged to produce a \$6,350,000 facility with 38 out of 50 rental units reserved for LMI persons. In 2021, Habitat for Humanity received \$120,000 in PY 2020 CDBG funding for their 20-unit townhouse project, utilizing a land trust model.

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

In 2015, an Analysis of Impediments to Fair Housing Choice (AI) included discussions on land use controls, zoning ordinances, building codes, and fees and charges. While this report is focused on fair housing it also provides valuable insight into affordable housing and the general housing climate in the City of Coeur d'Alene. The flexibility in the laws and awareness of housing issues by the leadership positions of the City assists in making the City both a desirable place to have and build affordable housing. The 2015 AI identifies no barriers in the community due to the above listed issues. The City has an even disbursement of residential, commercial, and industrial zoning with many areas of mixed use facilitating affordable housing near areas that offer jobs for the residents. Minimum lot sizes are among the lowest in the state, and accessory dwelling units are allowed in all zoning districts with no special permits required; these are all identified as favorable conditions compared to industry accepted barriers. Investigation into tax policies, growth limitations, and policies affecting the return on investment also reveal no significant barriers. In fact, the City has an incentive program called the Density Bonus Incentive which allows downtown projects to use a larger footprint of the parcel than current code generally allows as long as new workforce housing is built as part of the project. The workforce housing can be located on the same site or somewhere within the downtown core and its immediate surrounding district.

In 2019, the City amended the Accessory Dwelling Unit (ADU) code which will encourage additional ADU's to be built in Coeur d'Alene by allowing them over garages in the rear yard and an increased height for the structure if they are built over a garage. This code in its updated form incentivizes more units to be built and could result in a greater number of long-term rental opportunities to become available to residents of Coeur d'Alene. The Comprehensive Plan that was adopted in February 2022 also includes proposed action items related to affordable,

workforce and attainable housing.

Coeur d'Alene is working with Kootenai County, Hayden, Post Falls, Rathdrum, Kootenai Metropolitan Planning Organization (KMPO) and about 30 organizations to address regional housing and growth issues. The partnership is following up on the findings and recommendations from the December 2021 Housing Availability and Affordability Study for Kootenai County. Some of these efforts include evaluating multigenerational housing codes to provide more housing options for two adult generations to live under one roof but with separate dwelling spaces (e.g., separate kitchens, bedrooms, bathrooms and living areas) and other infill housing codes, modifications to short-term rental codes, land trusts, and public-private partnerships. A HomeShare project was launched in early 2022 to provide house sharing opportunities.

Discussion:

Other major barriers facing households and individuals trying to obtain homeownership are the extremely low inventory of affordable homes for sale, and, in relative terms, available to low/moderate income persons. This trend in rising housing costs is due to many factors which include the following: the landlocked geographic nature of the City; the increasing cost of land and existing housing stock; the increasing cost of labor and shortage of labor, increased cost of building materials; the great influx in population from higher cost cities (that has become even more pronounced with the pandemic), which has increased housing prices; and the deteriorating housing stock available. The City's ADU policy may positively impact the City's density related to availability of housing. In addition to this, the City's management of the CDBG funded EMRAP program sustains current housing stock that is deteriorating. Other efforts by local organizations are being made with the intent to catch up with the rising demand for housing. As noted in the December 2021 Housing Availability and Affordability Study for Kootenai County, 75% of County residents could afford to buy a home in 2016, whereas today 75% of County residents cannot afford to buy a home and median home prices are now over \$530,000. From September 2018 to 2020, Idaho had the 3rd fastest growing rent prices in the country and approximately 44% of county households cannot afford to pay average market rent prices.

The City will continue to write letters of support for projects seeking LMI tax credits that fit the goals of the Consolidated Plan. The City continues to seek additional methods of encouraging developers to construct LMI housing and encourages its non-profit partners to consider its CDBG funded Community Opportunity Grant when they are considering creative solutions to the housing shortage.

AP-85 Other Actions – 91.220(k)

Introduction:

Because the City's allocation of HUD funds is relatively small it is difficult to have a significant impact on the local area to further housing goals. The City prefers to reserve its financial resources for projects already identified with measurable achievements. However, the City intends to continue being available as an educational resource for coordination and management and for letters of support.

Actions planned to address obstacles to meeting underserved needs

The City will continue to work with local organizations such as St. Vincent de Paul, Habitat for Humanity of North Idaho, United Way of North Idaho, IHFA, Family Promise and other government and non-profit organizations to identify areas of need and appropriate activities to mitigate the problems as resources allow. The HELP Center is an excellent start to this process. The innovative partnership led by St. Vincent de Paul provides office space and basic operating functions in a one-stop-shop so that LMI persons can make inquiries and receive services from employment searches to housing assistance to basic health care. The obstacles to meeting underserved needs are as varied as the individuals who seek assistance. As organizations and agencies record program activities including successes and failures, adjustments are made to the process, to incorporate the most effective methodologies and modify or eliminate those that are not working. The process is ongoing and as flexible (within the confines of established regulations) as possible to address the conditions and circumstances adherent to Coeur d'Alene.

Actions planned to foster and maintain affordable housing

Plan year 2024 will bring new potential projects to the table with the Community Opportunity Grant, along with any ongoing projects working towards completion. The City encourages and supports affordable housing by looking for partnerships to add to the affordable housing stock and intends to continue utilizing methods similar to those already used in the past where CDBG funds are leveraged produce the best benefit for the investment. Habitat for Humanity received 2020 CDBG funds to support their 20-unit affordable housing project, which is a land trust model, which will be completed by the end of 2024.

Additionally, the City's CDBG funded Emergency Minor Home Repair and Accessibility Improvement Program will see an increase of funding during plan year 2024 which will provide funding to additional LMI homeowners. This program assists families to remain in their home by improving structural livability conditions to a residence thus maintaining the condition of current deteriorating housing stock available to qualifying low-to-moderate income residents.

Actions planned to reduce lead-based paint hazards

The City distributes lead hazard information pamphlets to any residents seeking information and with each application for the Emergency Minor Home Repair and Accessibility Improvement Program (EMRAP). The pamphlets are also available on the City's web page and within the customer service center where building permits are issued. Additionally, the City provided pamphlets and information to the local building contractors association. Starting in April 2010, all for-hire construction work in child-occupied facilities must comply with the EPA Renovator, Repair, and Painting (RRP) law. The RRP law requires that any person doing this work get RRP certification and perform additional recordkeeping and site cleanup. In October 2010, the City sponsored RRP training. Of the 23 individuals who received certification, some were contractors that have and will work on EMRAP projects.

It should be noted that the EMRAP projects tend to be reroofing, showers, flooring, bathrooms, and water heater projects. The grants are limited to \$5,000 per person per plan year, unless they are for a sewer or water lateral replacement and then the available grant is up to \$20,000, or for reroofing which is eligible for up to a \$10,000 grant.

Actions planned to reduce the number of poverty-level families

The City's anti-poverty strategy recognizes that individuals and their situations differ; there are those individuals who are capable of being gainfully employed and those who are not. Persons with debilitating diseases, persons with disabilities, and frail elderly are often limited in their ability to generate household income through employment. On the other hand, full-time employment does not always provide sufficient income to lift a household out of poverty, and income assistance can become a disincentive to work.

The City has committed to a number of strategies to help reduce poverty including partnerships with organizations such as Coeur d'Alene Area Economic Development Corporation (CDA-EDC) for job creation and ignite cda for economic development to provide better opportunities within the community. Also, there have been improvements to infrastructure including sidewalk repair/replacement in LMI neighborhoods to revitalize them which assists in alleviating burdens allowing people to better travel safely and efficiently, focusing their efforts elsewhere.

The City promotes workforce development and has been a strong supporter of the education corridor, which provides access for local residents to four institutions of higher learning (University of Idaho, North Idaho College, Lewis-Clark State College, Idaho State University). Additionally, NIC's Workforce Development Center offers job training and adult education opportunities beyond standardized secondary education.

Providing services to at-risk-youth is another priority for the City. Coeur d'Alene is diligent in seeking the best childcare regulations and encouraging growth of the industry so that working families can find affordable childcare and early education. The City supports the local Head Start agency and agrees that education is an important step in eliminating the cycle of poverty. The

City is pleased to have been a partner in the project to construct a Kroc Community Center in Coeur d'Alene. The Center has exceeded anticipated enrollment several times over since its opening and has a sliding scale for fees, allowing low- to-moderate income families and individuals to benefit from the Center's many programs at little or no cost.

Because transportation costs can be a large portion of the personal budget, the City of Coeur d'Alene is a partner with the Coeur d'Alene Tribe and other local jurisdictions in a regional bus system, CityLink, which provides transportation free of charge. Kootenai County and Citylink are currently pursuing grant funds to provide bus shelters for the Coeur d'Alene route, which will make public transit more desirable for riders, including LMI community members.

Actions planned to develop institutional structure

In order to move the needle and support more quality childcare businesses to emerge and thrive, the City Council adopted a code amendment in 2020, allowing childcare businesses operating as home occupations to have one employee who is not a resident and family member. This measure is expected to create more childcare spots, increase earning potential of small childcare businesses and promote high quality childcare by supporting businesses and connecting them with United Way of North Idaho for childcare business mentorship. Childcare availability is an essential factor of a healthy community and is a critical factor for all families looking to increase their income by taking on employment or to attend secondary education.

Many of the activities to assist low-to-moderate income persons, special needs individuals, the homeless, and other at-risk residents of Coeur d'Alene and Kootenai County area are delivered through an assortment of well-established programs under the direction of established organizations and agencies such as IHFA, Lake City Center, and the Disability Action Center. These service organizations are supported by the City's Community Opportunity Grant for local funding.

The City provides support as appropriate and practical, including web postings, providing information on the City's Public Education and Government Channel, distribution of printed materials, consultations and other aid as requested. In addition to this, the City hosts free annual trainings to support these agencies with professional development and staff training. In 2024, the City hosted free Fair Housing Training.

The City recognizes that agencies such as IHFA, who have been acting as the PHA for the region for many years, have a well-established, successful, and time-tested process in place to deliver needed services to the area. It is the City's position that programs which are meeting the requirements of the residents should be encouraged to request assistance when needed, and that the City's nominal resources can be best used to support the network of organizations and programs already in place.

The City is the lead agency for the CDBG funding. The City has established goals under their Entitlement program and works to integrate City planning and projects with the related activities of other agencies in the area using the Citizen Participation Plan, direct email requests, and other various methods of communication to facilitate this goal. The City does not plan to duplicate services of other established and successful programs.

The City's system of institutional structure is strong and well-coordinated, with little duplication of services. Gaps in delivery, if any, are typically a result of reduction in state and/or federal funding to supporting Continuum of Care organizations in their ability to carry out a complete service delivery system.

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

The City of Coeur d'Alene receives no other federal funding outside of CDBG for housing and non- housing community development. IHFA is the PHA for the region and administers the Section 8 program in the City of Coeur d'Alene.

The City will continue to attend IHFA housing roundtables and support local awareness of Fair Housing Law by hosting Fair Housing Trainings. Additionally, the City will continue attendance, support, and participation at the Region 1 Homeless Coalition meetings (Continuum of Care group). During the City's CDBG annual reporting and citizen participation meetings, the City focuses on bringing partners to the table to increase area knowledge and connectivity of resources. In addition to its CDBG public meetings, the City annually hosts trainings to benefit residents and public/private housing agencies. One such example is the City hosting a Fair Housing Training in downtown Coeur d'Alene, open to the public and stakeholder groups at no charge.

Discussion:

The availability of funding is always a key issue in providing necessary services to the community. CDBG funds and other social service funds are vital and if they continue to be cut, as they have in the recent past, more services will be lost and some organizations may not survive. The City's CDBG makes some funds available for public services and/or community grant opportunities to area non-profits in order to help fill their gaps as program funding allows.

Program Specific Requirements

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

Introduction:

The City of Coeur d'Alene does not currently have any planned activities that would call for program income.

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. | 80.00% |

Attachments

Citizen Participation Comments

Public Comments Received During the Public Hearing on the 2024 Annual Action Plan

Marcee Hartzell, CEO of TESH, Inc., commented on how the CDBG program and grant funds through the City's Community Opportunity Grant helps her organization bridge the gaps in funding they receive to support children and adults with intellectual disabilities. She said their facility serves those between the ages of 4 to 84 with day supports, job site supports, and that they rely on CDBG funds to support their facility. She noted that outside of services which are funded one-to-one by the state, they must seek grants or hold fundraisers in order to perform the much needed repairs/rehabilitation projects for their facility.

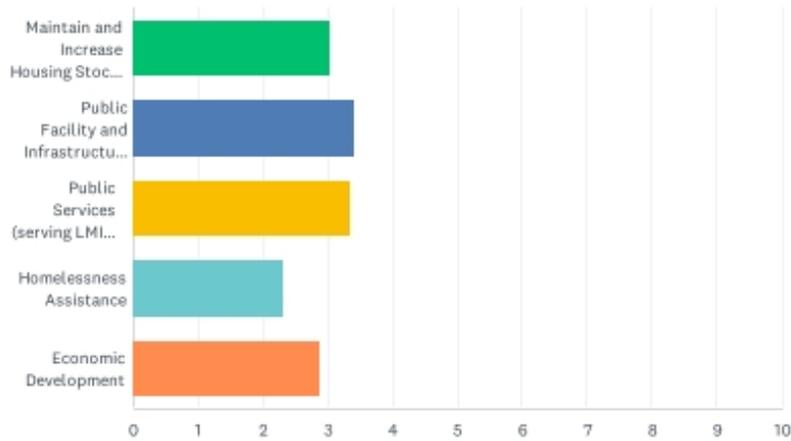
Amanda Krier, Executive Director of Safe Passage, commented that her organization serves those experiencing domestic violence, sexual assault, human trafficking, and also serves children who have experienced physical and sexual assault. Their services are free and confidential. She said they were seeking funds through the City's CDBG Community Opportunity Grant to make repairs to their confidential Safe Shelter which serves almost 300 parents and kids in Kootenai County each year.

Public Comments Received Via Email on the 2024 Annual Action Plan – Not Accepted

Ted Turrentine: " Firstly, I would like to ask if the city is OK with the fact that the Federal block grant money it may be receiving doesn't exist. It is borrowed money, coming from a government which is already 34 trillion dollars in debt, and will be adding to that debt, and the tax burden placed on American taxpayers, for untold generations, to service it. Perhaps my question is answered on page four of the Action Plan-..."the City hopes for consistent growth of the CDBG program...". "Yes, the City is fine with it, and in fact, covets an even larger share of it, at the expense of our Nation's financial solvency". Our founders never envisioned a Federal government which would subsidize, through income taxation, every distressed person with limited means in our nation. Aid/help for such would come from the private sector, families, neighbors, and churches, as it had for millennia. The 47 pages that make up the cities Action Plan is representative of everything wrong about the increase and size of the bureaucracy, at all government levels, necessary to administer the plethora of alphabet agencies, departments, bureaus, etc., associated with government aid. The covid-19 pandemic has been over for some time, and that period will be even greater by the time proposed pandemic related money in these grants is wrongly given to people and businesses who no longer need it. The entire CDBG program reeks of big Federal bureaucracy calling the shots/benevolently granting it's permission about how CDA choses to handle it's own issues. The city should be looking for ways to wean people off of addictive public assistance of all kinds, which many have come to expect as normal, or at very least, permanent, rather than temporary."

Q1 Below are the 5 identified goals established for the City of Coeur d'Alene's CDBG 5-Year Consolidated Plan. Please rank these goals (from highest to lowest) in terms of urgency.

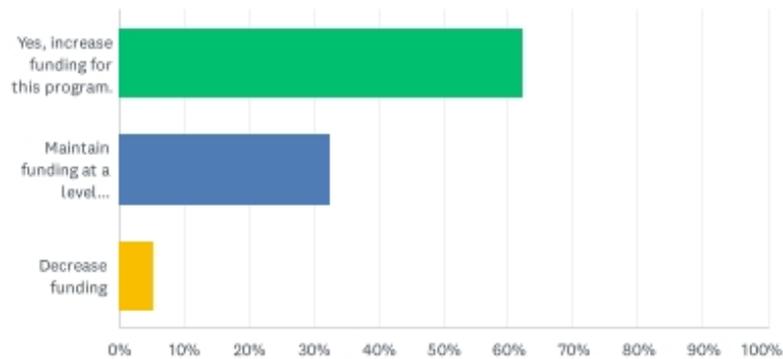
Answered: 37 Skipped: 0



	1	2	3	4	5	TOTAL	SCORE
Maintain and Increase Housing Stock (both ownership and rentals)	27.03% 10	13.51% 5	16.22% 6	21.62% 8	21.62% 8	37	3.03
Public Facility and Infrastructure Projects (serving LMI residents)	22.22% 8	27.78% 10	27.78% 10	13.89% 5	8.33% 3	36	3.42
Public Services (serving LMI residents)	13.89% 5	30.56% 11	33.33% 12	19.44% 7	2.78% 1	36	3.33
Homelessness Assistance	11.11% 4	5.56% 2	19.44% 7	30.56% 11	33.33% 12	36	2.31
Economic Development	27.03% 10	18.92% 7	2.70% 1	16.22% 6	35.14% 13	37	2.86

Q2 The City's CDBG funded Emergency Minor Home Improvement and Accessibility Program (EMRAP) has been approved for funding in the past at \$75,000 per year. The great majority of beneficiaries of this program are disabled seniors living on fixed incomes. This program assists an average of 15-20 qualifying LMI homeowners each year addressing housing deteriorations which threaten the livability of the home. You can find more information at www.cdaid.org/emrap. Do you support increasing this program's funding for PY 2024?

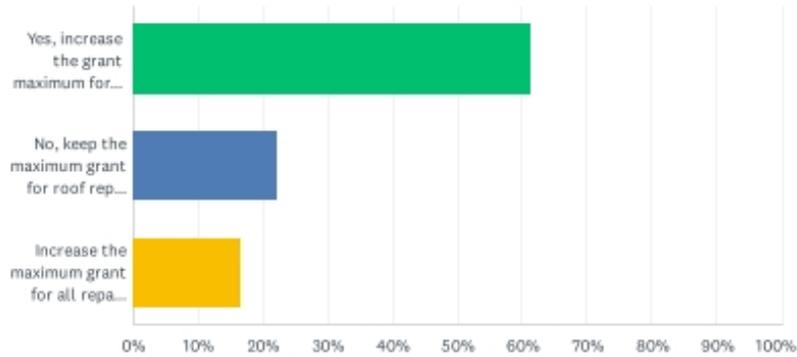
Answered: 37 Skipped: 0



ANSWER CHOICES	RESPONSES	
Yes, increase funding for this program.	62.16%	23
Maintain funding at a level comparable to continue to assist 15-20 qualifying homeowners.	32.43%	12
Decrease funding	5.41%	2
TOTAL		37

Q3 EMRAP grants are currently for a maximum of \$5,000 for repairs (other than sewer and water main connections). Do you support increasing the maximum grant amount to \$10,000 in order to help cover the costs of major roof repairs and/or roof replacements?

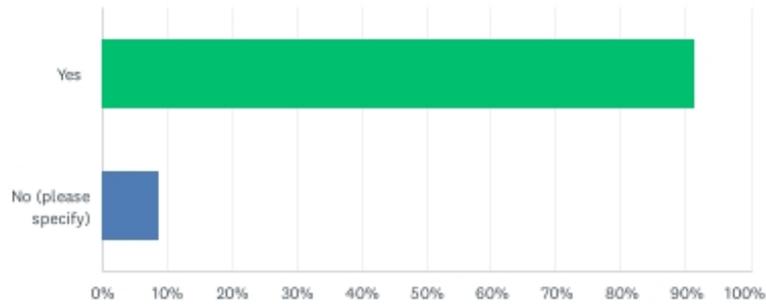
Answered: 36 Skipped: 1



ANSWER CHOICES	RESPONSES	
Yes, increase the grant maximum for roof repair or replacement to \$10,000.	61.11%	22
No, keep the maximum grant for roof repair or replacement at \$5,000.	22.22%	8
Increase the maximum grant for all repairs (other than sewer/water mains) to \$10,000.	16.67%	6
TOTAL		36

Q4 The City's CDBG Grant supports an annual Community Opportunity Grant which allows for private and non-profit entities to submit an application soliciting funding to target community needs. All projects are considered on a competitive basis, must be eligible under HUD activities, and must benefit low-to-moderate income CDA residents. Community Grant funding varies based on the CDBG Grant's annual allocation. More information can be found at www.cdaid.org/communitygrant. Do you support funding the Community Opportunity Grant in its current competitive fashion?

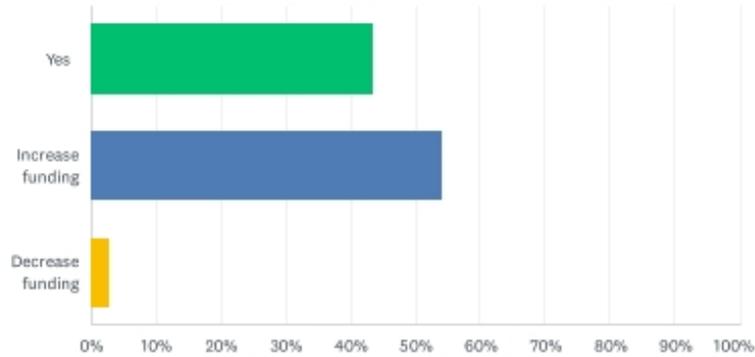
Answered: 34 Skipped: 3



ANSWER CHOICES	RESPONSES	
Yes	91.18%	31
No (please specify)	8.82%	3
TOTAL		34

Q5 The City supports Lake City Center's Meals on Wheels program with \$10,000 in annual CDBG Funding. This support covers roughly 1-month worth of program food costs for homebound seniors. Do you support the non-competitive funding of \$10,000 for Meals on Wheels?

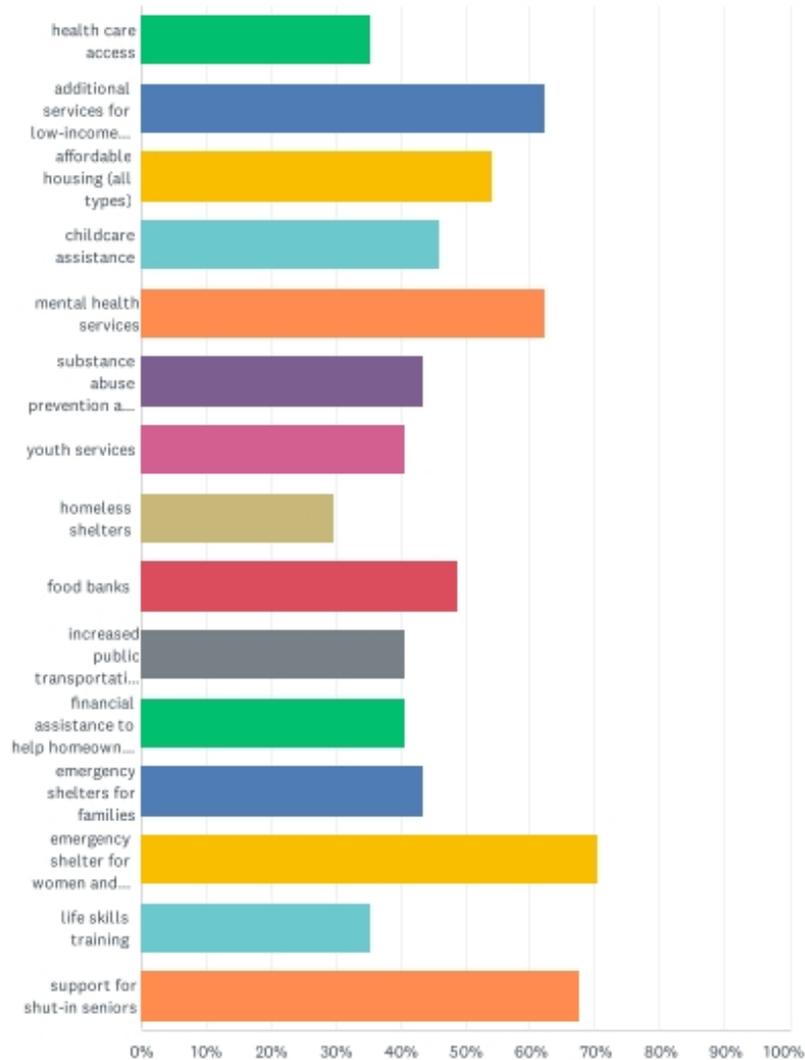
Answered: 37 Skipped: 0



ANSWER CHOICES	RESPONSES	
Yes	43.24%	16
Increase funding	54.05%	20
Decrease funding	2.70%	1
TOTAL		37

Q6 In addition to its 5 guiding goals, the City's CDBG Grant identified the following community needs in PY 2023 that would benefit low-to-moderate income families if funded. Please check the needs below that you consider to still be urgent and relevant for Coeur d'Alene in PY 2024.

Answered: 37 Skipped: 0



6 / 10

City of Coeur d'Alene: CDBG Annual Action Plan Survey for 2024

ANSWER CHOICES	RESPONSES	
health care access	35.14%	13
additional services for low-income seniors	62.16%	23
affordable housing (all types)	54.05%	20
childcare assistance	45.95%	17
mental health services	62.16%	23
substance abuse prevention and counseling	43.24%	16
youth services	40.54%	15
homeless shelters	29.73%	11
food banks	48.65%	18
increased public transportation routes for non-linear workforce hours	40.54%	15
financial assistance to help homeowners repair, maintain, and correct health and safety code violations	40.54%	15
emergency shelters for families	43.24%	16
emergency shelter for women and children fleeing domestic violence	70.27%	26
life skills training	35.14%	13
support for shut-in seniors	67.57%	25
Total Respondents: 37		

Q7 If not listed above, please identify any high-level community needs you consider urgent in the City of Coeur d'Alene that you would like to see addressed in the PY 2024 CDBG Annual Action Plan.

Answered: 8 Skipped: 29

8 / 10

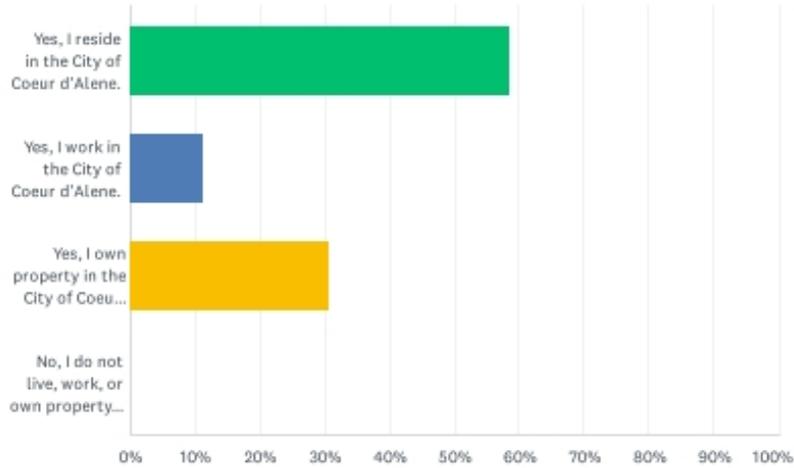
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#	RESPONSES	DATE
1	we need to maintain and increase HUD housing assistance here in Coeur d alene.	6/24/2024 11:53 PM
2	Affordable housing for locals is my number one concern	6/24/2024 6:19 AM
3	infrastructure of city (expanding major auxiliaries, streamline traffic- accommodating all the vehicles which come with the people you are building homes for off Atlas Rd.)	6/23/2024 4:50 PM
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7	Explain "LMI" at some point in the beginning of the survey.	6/22/2024 7:26 AM
8	Care facilities for seniors and in particular those with dementia and Alzheimer's.	6/22/2024 6:26 AM

Q8 Are you a City of Coeur d'Alene resident, own property, or work within the City?

Answered: 36 Skipped: 1



ANSWER CHOICES	RESPONSES	
Yes, I reside in the City of Coeur d'Alene.	58.33%	21
Yes, I work in the City of Coeur d'Alene.	11.11%	4
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No, I do not live, work, or own property within the City of Coeur d'Alene.	0.00%	0
TOTAL		36

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If so, please list your name, email, organization, and phone number.
CDBG Stakeholders receive updates throughout the year regarding the
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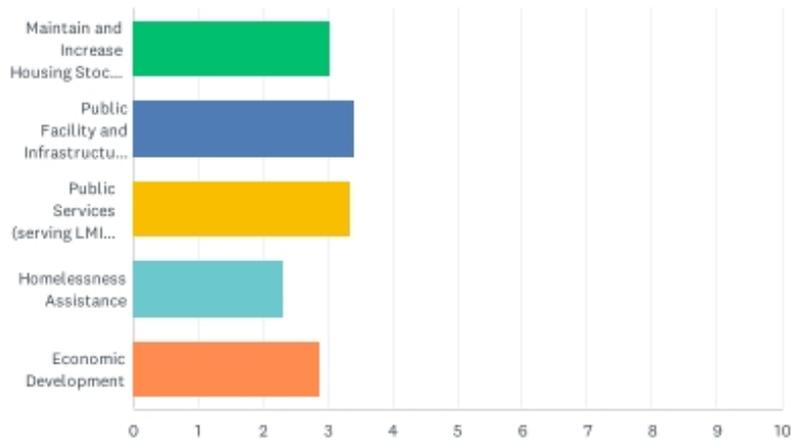
Answered: 13 Skipped: 24

Grantee Unique Appendices

City of Coeur d'Alene: CDBG Annual Action Plan Survey for 2024

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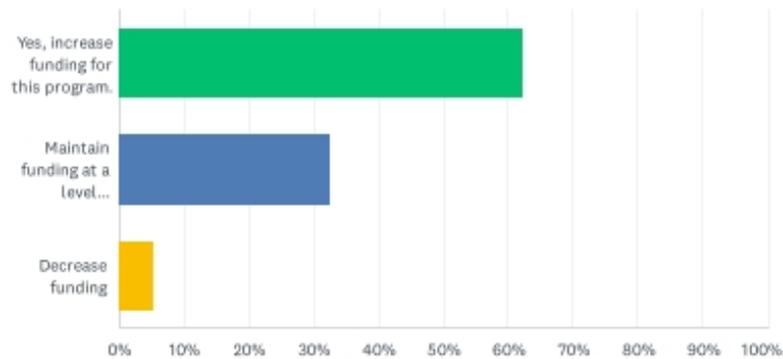


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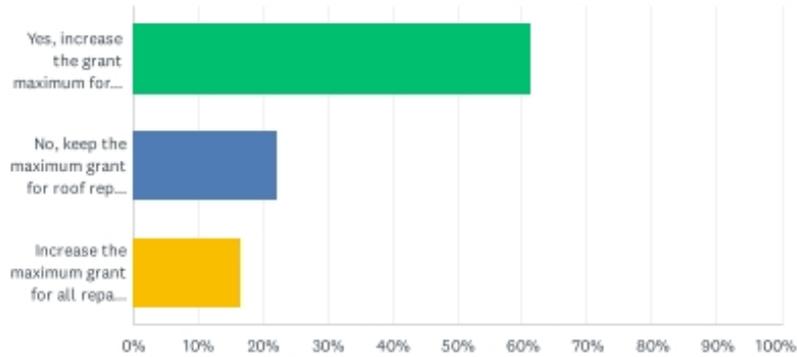
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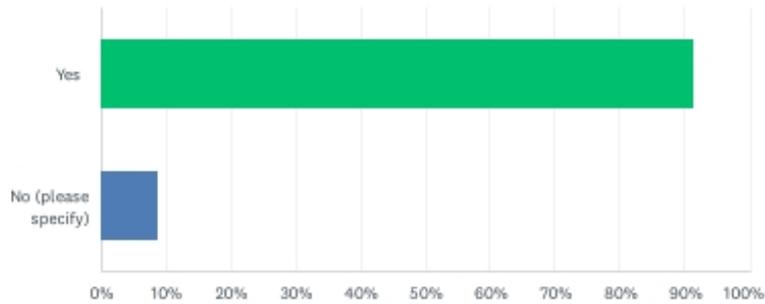
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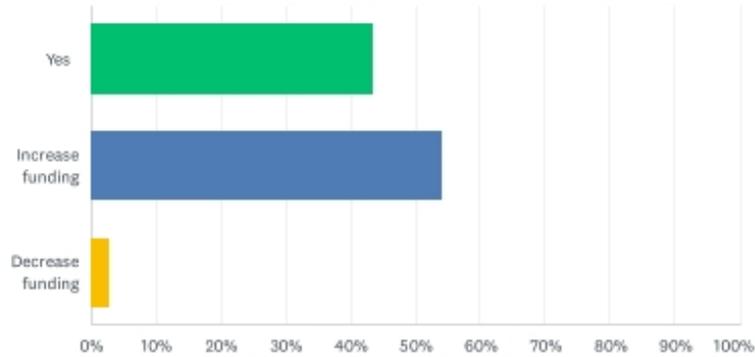
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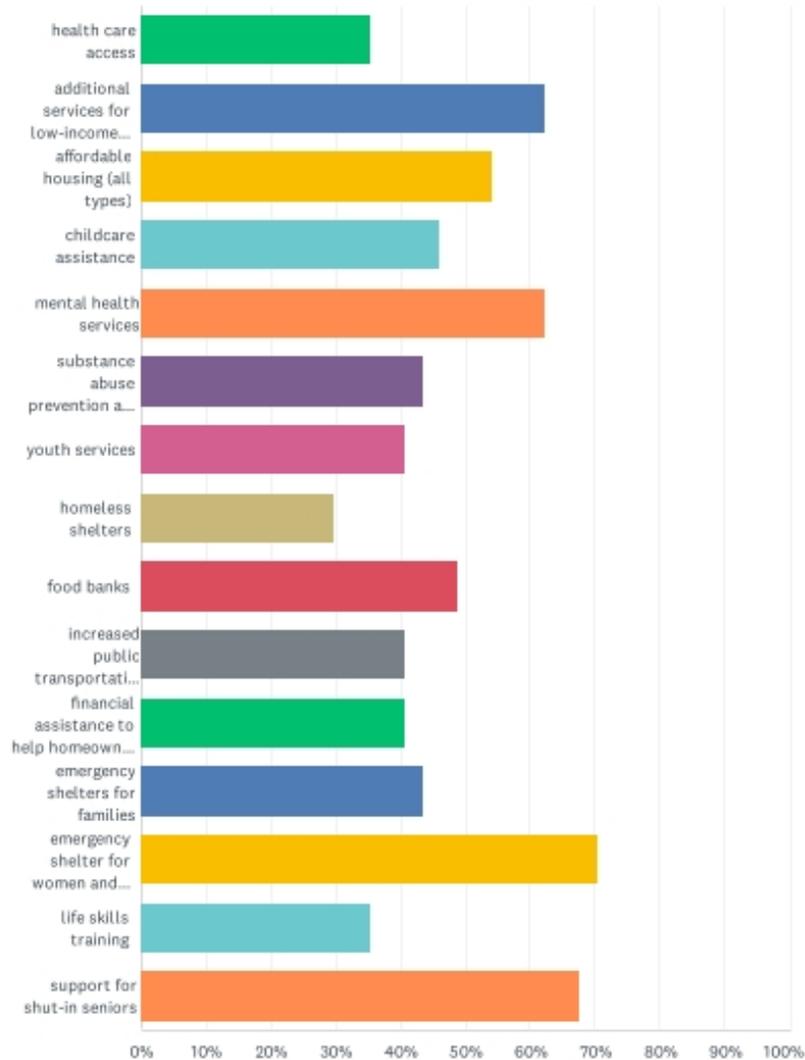
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8 / 10

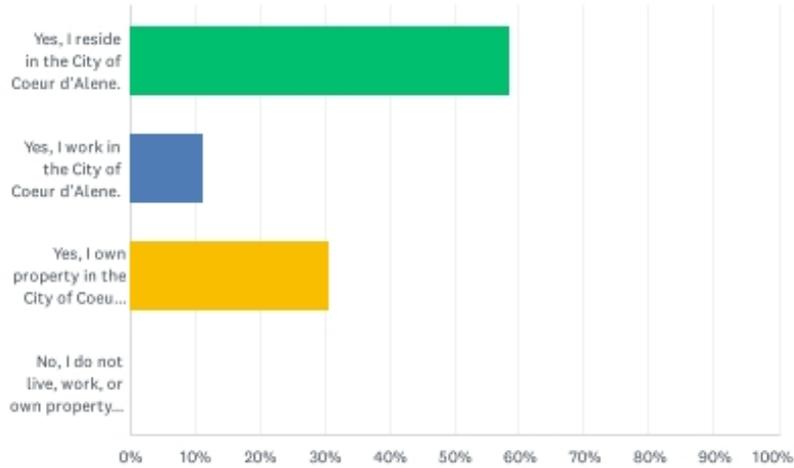
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City of Coeur d'Alene's CDBG Grant.**

Answered: 13 Skipped: 24

**Notice of Public Forum,
Public Comment Period,
and Public Hearing
on the City's CDBG Annual
Action Plan**

The City of Coeur d'Alene will be drafting an Annual Action Plan for the use of Community Development Block Grant (CDBG) funds for plan year (PY) 2024. The City will receive CDBG funds in the amount of \$296,418.00 for PY2024 beginning October 1, 2024.

The draft Annual Action Plan for PY2024 will be available for review and comment for a period of 30 days from July 6, 2024 through August 6, 2024. The draft Plan will be available on the City's website at www.cdaid.org/cdbg or in person at City Hall, 710 E. Mullan Avenue, Coeur d'Alene, Idaho 83814. Written comments should be submitted by email to CDBG Administrator Sherrie Badertscher at SherrieB@cdaid.org.

A Public Forum will be held at City Hall on June 28, 2024, from Noon-1:00 p.m. in conference room 6, to inform residents on how CDBG funds were used in past program years and to obtain citizen input about current needs and spending priorities for PY2024.

A Public Hearing to consider any and all public comments will be held at a regular meeting of the City Council on August 6, 2024, at 6:00 p.m. For the meeting agenda and details on how to participate, visit <https://www.cdaid.org/council/council-agenda-packets> prior to the meeting.

For additional information contact CDBG Administrator Sherrie Badertscher at 208-769-2382 or by email SherrieB@cdaid.org.
Legal# 12636
AD# 24219
June 14 & 28, 2024

Order Confirmation

<u>Ad Order Number</u> 0000024219	<u>Customer</u> COEUR D'ALENE, CITY OF	<u>Payer Customer</u> COEUR D'ALENE, CITY OF	<u>PO Number</u>
<u>Sales Rep</u> kpacker+cdahouse@ha...	<u>Customer Account</u> 9491	<u>Payer Account</u> 9491	<u>Ordered By</u> ehealey@cdapress.com
<u>Order Taker</u> ehealey@cdapress.com	<u>Customer Address</u> 710 E MULLAN AVE COEUR D ALENE, ID 83814	<u>Payer Address</u> 710 E MULLAN AVE COEUR D ALENE, ID 83814	<u>Customer Fax</u>
<u>Order Source</u>	<u>Customer Phone</u> 2087692231	<u>Payer Phone</u> 2087692231	<u>Special Pricing</u>

<u>Tear Sheets</u>	<u>Proofs</u>	<u>Affidavits</u>	<u>Blind Box</u>	<u>Promo Type</u>	<u>Materials</u>
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Invoice Text
CDA#12636 NOPH CDBG ANNUAL ACTION PLAN

Ad Order Notes
Run dates: June 14 & 28, 2024

<u>Net Amount</u>	<u>Tax Amount</u>	<u>Total Amount</u>	<u>Payment Method</u>	<u>Payment Amount</u>	<u>Amount Due</u>
95.84	\$0.00	95.84	Invoice	\$0.00	95.84

06/12/2024 11:52 AM

page 1 of 1

Ad Number **Ad Type** **Ad Size**
0000024219 ID-Metro 1 x 6.996" (61 lines)

Run Date	Product	Placement	Position	Rate	Cost
06/14/2024	ID-COEUR D'ALENE PRE	LEGALS	Any	\$0.77	\$54.97
06/28/2024	ID-COEUR D'ALENE PRE	LEGALS	Any	\$0.67	\$40.87

06/12/2024 11:52 AM

page 2 of 2

City of Coeur d'Alene CDBG
2024 Annual Action Plan & Hearing

August 6, 2024



1

1

2024 AAP Hearing Overview

- ❖ Background
- ❖ Citizen Participation Process
- ❖ 2024 Needs Identified by Community
- ❖ 2024 Annual Action Plan Budget
- ❖ Opportunity for Public Comment
(Public Hearing)



2

2

1

Tonight's Request:

- ❖ Approval of the City's Submittal of the CDBG 2024 Annual Action Plan to HUD (following the public hearing).



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Brief History

- ❖ The City's Community Development Block Grant (CDBG) is a grant from the Housing and Urban Development Agency (HUD) to support low-to-moderate income Coeur d'Alene residents through specific allowable activities
- ❖ The City first became eligible to receive CDBG funds in 2007



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CDBG Key Terms

❖ **LMI (Low-to-Moderate Income) =**
HUD designation of a households whose total earnings are based on 30%, 50%, and 80% of the yearly area median income

HUD's 2024 Median Income determination for Kootenai County:\$97,300 (based on a family of 4)



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CDBG Eligible Activities

- ❖ Acquisition of Real Property
- ❖ Relocation and Demolition
- ❖ Rehabilitation of Residential and Non-Residential Structures
- ❖ Construction of Public Facilities and Improvements
- ❖ Public Services (maximum 15% of annual allocation)



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Eligible Public Service Activities

- ❖ Mental Health Services
- ❖ Fair Housing Counseling
- ❖ Education Programs
- ❖ Energy Conservation
- ❖ Services for Senior Citizens
- ❖ Services for Homeless Persons
- ❖ Employment Services
- ❖ Crime Prevention
- ❖ Public Safety
- ❖ Childcare
- ❖ Health Services
- ❖ Substance Abuse Services

Capped at 15%= \$44,462
Meals on Wheels Annual Grant = \$10,000
\$34,462 Available for Public Service Activities



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Selecting Activities Each Year

- ❖ Activities must meet a National Objective:
 - Benefit to low-and-moderate income (LMI) persons
 - Aid in the prevention of slum and blight
 - Meet an urgent need
- ❖ Activities must meet Annual Action Plan and Consolidated Plan Goals and be a HUD approved activity
- ❖ Capacity of City staff, amount of allocation, priorities, and capacity/experience of sub-recipient organizations



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Overview of Administrative Costs

- ❖ Subject to 20% cap of annual allocation budget
- ❖ Eligible Administrative Costs:
 - Employee Wages and Benefits
 - Administration of Grant Awards
 - Travel and Training Expenses
 - Consultant Assistance
 - Advertising
 - Supplies
 - Support of Fair Housing Activities



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Consolidated Planning Goals for 2023-2027

1. Maintain and Increase Housing Stock (ownership & rentals)
2. Public Facility and Infrastructure Projects
3. Public Services
4. Homelessness Assistance
5. Economic Development

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Citizen Participation

Public Forum, Community Survey, 30-Day Public Comment Period, Public Hearing:

- ✓ Advertised: Coeur d'Alene Press notices, Public Education and Government Channel Ads, City Facebook and website updates, shared community flyers, and ongoing email communications to 170+ community stakeholders

Citizen Participation Results:

- ✓ Public Survey Results, Forum attendees, and Consultations with Stakeholders revealed strong support for proposed goals set forth in the survey



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→ Survey Responses ←

Survey responses are in order of priority:

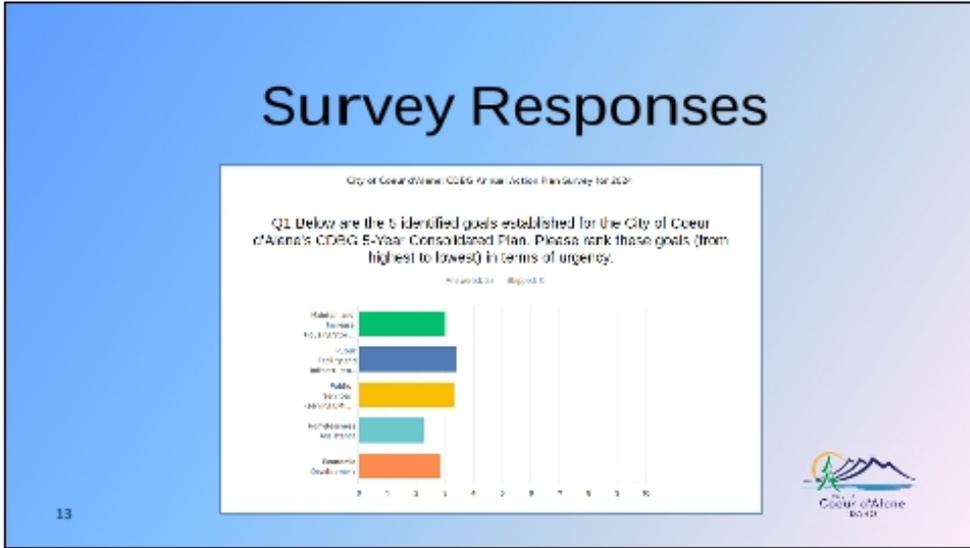
1. Public Facilities and Infrastructure Projects
2. Public Services
3. Maintain and Increase Affordable Housing (ownership and rentals)
4. Economic Development
5. Homelessness Assistance



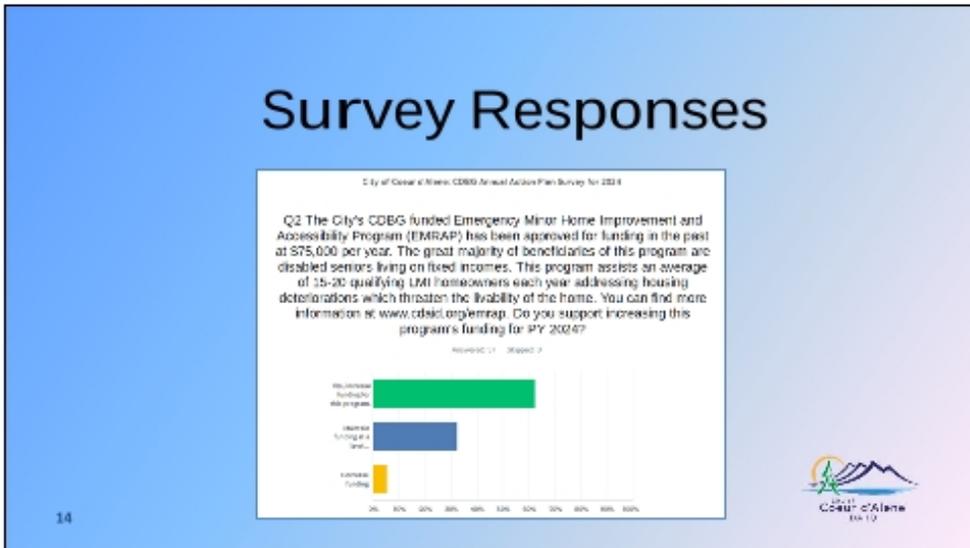
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Draft 2024 AAP Budget

Based on Funding of \$296,418

2024 Funding	Project
\$10,000 (3%)	Lake City Center "Meals on Wheels"
\$141,491 (43%)	Emergency Minor Home Repair and Accessibility Program (EMRAP)
\$85,644 (34%)	Community Opportunity Grants (Includes Public Service Activities capped at 15% annual allocation)
\$59,283 (20%)	Administration (Employee wages and benefits, administration of EMRAP program, travel and training expenses, advertising, supplies, support of Fair Housing Activities—Subject to 20% cap of annual allocation budget)
\$296,418	Grant Total

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Tonight's Actions:

- Questions About the 2024 AAP?
- Hold the Public Hearing on the 2024 AAP
- City Council Decision Point:
 - Approve the Submittal of the 2024 Annual Action Plan to HUD for Official Review.

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Grantee SF-424's and Certification(s)



710 E. MULLAN AVENUE
COEUR D'ALENE, IDAHO 83814
208/769-2231

July 22, 2024

Keisha Lafayette, CPD Representative
U.S. Department of Housing & Urban Development
1220 SW 3rd Avenue, Suite 400
Portland, OR 97204-2825

Re: Original SF424, SF424D and Certifications

Dear Ms. Lafayette:

Enclosed please find the signed original SF424, SF424D and Certifications for the City of Coeur d'Alene's Plan Year 2024 Annual Action Plan submittal.

Please let me know if you need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Hilary Patterson".

Hilary Patterson
Community Planning Director

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input type="checkbox"/> New <input checked="" type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text"/>	4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: E-24-MC-16-0007	
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text" value="City of Coeur d'Alene"/>		
* b. Employer/Taxpayer Identification Number (EINTIN): <input type="text" value="82-6060176"/>	* c. UEI: <input type="text" value="N6N6LE7F3931"/>	
d. Address:		
* Street1: <input type="text" value="710 E Mullan Ave"/>	Street2: <input type="text"/>	
* City: <input type="text" value="Coeur d'Alene"/>	County/Parish: <input type="text"/>	
* State: <input type="text" value="ID: Idaho"/>	Province: <input type="text"/>	
* Country: <input type="text" value="USA: UNITED STATES"/>	* Zip / Postal Code: <input type="text" value="83814-3958"/>	
e. Organizational Unit:		
Department Name: <input type="text" value="Planning"/>	Division Name: <input type="text"/>	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text"/>	* First Name: <input type="text" value="Hilary"/>	
Middle Name: <input type="text"/>	* Last Name: <input type="text" value="Patterson"/>	
Suffix: <input type="text"/>	Title: <input type="text" value="Community Planning Director"/>	
Organizational Affiliation: <input type="text" value="City of Coeur d'Alene"/>		
* Telephone Number: <input type="text" value="208-769-2270"/>	Fax Number: <input type="text"/>	
* Email: <input type="text" value="hpatterson@ccdaid.org"/>		

Application for Federal Assistance SF-424	
<p>* 9. Type of Applicant 1: Select Applicant Type:</p> <input type="text" value="C: City or Township Government"/> <p>Type of Applicant 2: Select Applicant Type:</p> <input type="text"/> <p>Type of Applicant 3: Select Applicant Type:</p> <input type="text"/> <p>* Other (specify):</p> <input type="text"/>	
<p>* 10. Name of Federal Agency:</p> <input type="text" value="U.S. Department of Housing and Urban Development"/>	
<p>11. Catalog of Federal Domestic Assistance Number:</p> <input type="text" value="14.218"/> <p>CFDA Title:</p> <input type="text" value="Community Development Block Grant"/>	
<p>* 12. Funding Opportunity Number:</p> <input type="text"/> <p>* Title:</p> <input type="text"/>	
<p>13. Competition Identification Number:</p> <input type="text"/> <p>Title:</p> <input type="text" value="Coeur d'Alene CDBG Entitlement"/>	
<p>14. Areas Affected by Project (Cities, Counties, States, etc.):</p> <input type="text"/> <div style="display: flex; justify-content: space-between; width: 100%;"> Add Attachment Delete Attachment View Attachment </div>	
<p>* 15. Descriptive Title of Applicant's Project:</p> <input type="text" value="2024 Coeur d'Alene CDBG Entitlement"/>	
<p>Attach supporting documents as specified in agency instructions.</p> <div style="display: flex; justify-content: space-between; width: 100%;"> Add Attachments Delete Attachments View Attachments </div>	

Application for Federal Assistance SF-424

16. Congressional Districts Of:
 * a. Applicant: * b. Program/Project:

Attach an additional list of Program/Project Congressional Districts if needed:

17. Proposed Project:
 * a. Start Date: * b. End Date:

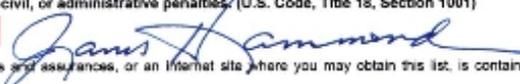
18. Estimated Funding (\$):

* a. Federal	<input type="text" value="296,418.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="296,418.00"/>

* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?
 a. This application was made available to the State under the Executive Order 12372 Process for review on
 b. Program is subject to E.O. 12372 but has not been selected by the State for review.
 c. Program is not covered by E.O. 12372.

* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)
 Yes No
 If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties (U.S. Code, Title 18, Section 1001)

** I AGREE 

** The list of certifications and assurances, or an Internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:
 Middle Name:
 * Last Name:
 Suffix:
 * Title:
 * Telephone Number: Fax Number:
 * Email:
 * Signature of Authorized Representative:  * Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 od-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Standard Form 424D (Rev. 7-97)
Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	MAYOR
APPLICANT ORGANIZATION	DATE SUBMITTED
CITY OF COEUR D'ALENE	07/18/2024

SF-424D (Rev. 7-97) Back

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2024 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

OPTIONAL Community Development Block Grant Certification

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.


Signature of Authorized Official

07-18-2024
Date

Mayor
Title

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Subsidy layering -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

Signature of Authorized Official

Date

Title

Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

Major rehabilitation/conversion/renovation – If an emergency shelter’s rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for these individuals.

Matching Funds – The recipient will obtain matching amounts required under 24 CFR 576.201.

Confidentiality – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

Discharge Policy – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

Signature of Authorized Official

Date

Title

Housing Opportunities for Persons With AIDS Certifications

The HOPWA grantee certifies that:

Activities -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building -- Any building or structure assisted under that program shall be operated for the purpose specified in the consolidated plan:

1. For a period of not less than 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For a period of not less than 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

Signature of Authorized Official

Date

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.