

City of Coeur d'Alene, ID

2023 Consolidated Annual Performance and Evaluation Report (CAPER) for the Community Development Block Grant (CDBG) Program

DRAFT DOCUMENT FOR PUBLIC REVIEW THROUGH DECEMBER 3, 2024

Prepared by Coeur d'Alene's Planning Department

NOTE: The CAPER will be available for review and public comment from November 15, through December 3, 2024. There will be a public hearing at the regular meeting of the City Council on **December 3, 2024, at 6:00pm** in the Library Community Room, 702 E. Front Ave, Coeur d'Alene, Idaho, 83814.

Comments on the draft CAPER may be emailed to Community Development Specialist Sherrie Badertscher at SherrieB@cdaid.org, or mailed to the City of Coeur d'Alene, 710 E. Mullan Ave, Coeur d'Alene, Idaho, 83814, attention Sherrie Badertscher, Planning Department. Verbal comments may be provided by calling 208-769-2382.

Contents

CR-05 - Goals and Outcomes	3
CR-10 - Racial and Ethnic Composition of Families Assisted	8
CR-15 - Resources and Investments 91.520(a)	9
CR-20 - Affordable Housing 91.520(b)	11
CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)	14
CR-30 - Public Housing 91.220(h); 91.320(j)	17
CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j).....	18
CR-40 - Monitoring 91.220 and 91.230.....	22
CR-58 – Section 3	24

CR-05 - Goals and Outcomes

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

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The 2023 Program Year Consolidated Annual Performance and Evaluation Report (CAPER) for the City of Coeur d'Alene is presented in accordance with the required format and template. Community Development Block Grant (CDBG) grantees must respond annually to comply with Federal Regulations. This report covers Program Year 2023 (PY23), from October 1, 2023, to September 30, 2024. City residents may use the CAPER to review the performance of funded housing and community development projects during PY23. The City has been participating in the CDBG program since 2007, benefiting the community through programs and services that support low- and moderate-income individuals and households.

For PY23, the City received entitlement funding of \$358,560. The City established five (5) guiding goals in the 2023-2027 Consolidated Plan: 1) Maintain and Increase Housing Stock (both ownership and rentals); 2) Public Facility and Infrastructure Projects; 3) Public Services; 4) Homelessness Assistance; and 5) Economic Development.

Funded goals for PY23 included Affordable For Sale and For Rent Housing (including Owner Occupied Housing Rehab, Down Payment Assistance, Affordable Housing Acquisition), Public Services, and Public Facility and Infrastructure Projects, all aimed at supporting low- and moderate-income (LMI) residents of Coeur d'Alene.

Completed activities in PY23 include:

- **Lake City Center** - "Meals on Wheels" program non-competitive grant (Public Services goal): \$10,000
- **St. Vincent de Paul** - H.E.L.P. Center Roof Replacement Project (Public Facility and Infrastructure goal): \$125,000
- **Emergency Minor Home Repair and Accessibility Program (EMRAP)** – Six (6) completed with 2023 funds (Affordable For Sale and For Rent Housing goal) which included one project supplemented with \$571.00 of PY21 funds, benefitting 6 households (Note: There are an additional 5 projects which started in PY23 and will be completed early in PY24): \$40,081.20
- **TESH, Inc.** (PY22 funding) - Lighting Upgrade Project (Public Facility and Infrastructure goal): \$12,135.00

- **Habitat for Humanity** (PY20 funding) – Phase I Project Planning of the 20-unit for-sale townhouse 2nd Street development project (Affordable For Sale and For Rent Housing goal) spent down PY20 grant funds in the amount of \$106,560.53. Habitat for Humanity expects to add 3-4 units to the housing stock in PY24. There is \$13,439.47 of PY20 grant funds remaining for reallocation to another project with City Council approval.

A total of \$246,793.20 was drawn down from PY23 funds, as detailed in the attached PR05 report:

- St. Vincent de Paul Roof Replacement Project: \$125,000.00
- Six (6) EMRAP projects: \$32,827.23
- Meals on Wheels: \$10,000.00
- General Administration: \$71,712.00
- EMRAP Activity Delivery Costs: \$7,253.97

Additionally, the City funded the 21st Street Sidewalk Accessibility project (Public Facility and Infrastructure goal) utilizing Plan Year 2018-2022 funds totaling \$31,403.00. This project was completed in mid-October 2024, with accomplishments to be reported in PY24. Safe Passage was awarded \$76,848.00 in PY23 funds to replace the roof and remodel the kitchen in their Safe House, which provides emergency shelter for domestic violence survivors. Safe Passage is currently soliciting proposals, with work expected to begin in January 2025, and be completed by September 2025.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee’s program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Affordable For Sale and For Rent Housing	Affordable Housing	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	60	0	0.00%			
Affordable For Sale and For Rent Housing	Affordable Housing	CDBG: \$	Rental units constructed	Household Housing Unit	100	0	0.00%			

Affordable For Sale and For Rent Housing	Affordable Housing	CDBG: \$	Homeowner Housing Added	Household Housing Unit	20	0	0.00%			
Affordable For Sale and For Rent Housing	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	100	6	6.00%	10	6	60.00%
Affordable For Sale and For Rent Housing	Affordable Housing	CDBG: \$	Direct Financial Assistance to Homebuyers	Households Assisted	20	0	0.00%			
Economic Development	Non-Housing Community Development	CDBG: \$	Businesses assisted	Businesses Assisted	5	0	0.00%			
Homelessness Assistance	Homeless	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	8240	0	0.00%			
Homelessness Assistance	Homeless	CDBG: \$	Homelessness Prevention	Persons Assisted	20	0	0.00%			
Public Facility and Infrastructure Projects	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	150	432	288.00%	275	432	157.09%
Public Facility and Infrastructure Projects	Non-Housing Community Development	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	0		0	0	

Public Facility and Infrastructure Projects	Non-Housing Community Development	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0		0	0	
Public Facility and Infrastructure Projects	Non-Housing Community Development	CDBG: \$	Homelessness Prevention	Persons Assisted	0	0		25	0	0.00%
Public Services	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	500	350	70.00%	300	350	116.67%
Public Services	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	60	0	0.00%			

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

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

Affordable housing is a top priority in the City of Coeur d'Alene's 2023-2027 Consolidated Plan. The City's popular EMRAP program helps homeowners in Coeur d'Alene maintain housing stability by improving livability measures in their homes. Although the City did not meet its goal of assisting ten (10) homes through EMRAP, all PY23 EMRAP funds have been allocated to projects. Five (5) additional projects initiated in PY23 will be completed early in PY24. The City collaborates with area partners on more expensive projects, such as increasing affordable For-Sale housing, and expanding the supply of affordable rental housing. Area partners can apply for a Community Opportunity Grant, funded by the City's CDBG Grant and applications for the grant should support these key goals.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	CDBG
White	824
Black or African American	4
Asian	9
American Indian or American Native	10
Native Hawaiian or Other Pacific Islander	4
Total	851
Hispanic	19
Not Hispanic	832

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

Narrative

According to the latest ACS Demographic Data, Coeur d'Alene has a minority population of approximately 9%, encompassing all races other than "White." The City strictly prohibits any form of discrimination based on race or ethnic background. Many projects funded by CDBG benefit seniors, such as "Meals on Wheels" and the Emergency Minor Repair and Accessibility Program (EMRAP). These programs are income-based, not ethnicity-based. Although the minority population is around 9%, this figure is not always reflected in applications and completed projects, as some applicants choose not to disclose their ethnicity, race, gender, or head of household status. All documents, including applications for Community Opportunity Grants and EMRAP, can be translated into any language upon request.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	\$358,560	\$246,793

Table 3 - Resources Made Available

Narrative

The City's Plan Year 2023 (PY23) entitlement allocation was \$358,560.00. In PY 2023, \$246,793.20 was expended of the 2023 allocation.

In PY23, the total activities committed was \$278,793.20, with \$32,000.00 in open activities and \$246,793.20 in completed activities.

Drawdowns were made for the following projects from 2023 funds:

- St. Vincent de Paul Roof Replacement Project: \$125,000.00
- Six (6) EMRAP projects: \$32,827.23
- Meals on Wheels: \$10,000.00
- General Administration: \$71,712.00
- EMRAP Activity Delivery Costs: \$7,253.97.00

In PY23, \$22,962.52 was spent from entitlement from years 2020 and 2022 in the following amounts (See: PR26):

PY20: \$10,827.52 – Habitat for Humanity- Phase I Project Planning-2nd St Development Project

PY22: \$12,135.00 – TESH, Inc. – Lighting Upgrade Project

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
LMI Census areas			
Sidewalk Improvement Program			

Table 4 – Identify the geographic distribution and location of investments

Narrative

The City of Coeur d'Alene does not have designated Target Areas or Neighborhood Stabilization Program areas. Homes assisted through EMRAP were spread across various locations throughout the City, rather than being concentrated in a single area. However, several EMRAP projects were completed in a low- to moderate-income (LMI) census tract, which has the highest concentration of LMI residents in Coeur d'Alene.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

Matching funds are not required for the City of Coeur d'Alene's Community Opportunity Grant Program or for those projects initiated through the City's open door policy. Only projects that demonstrate a complete and reasonable budget are considered for funding. The City is always open to potential projects and/or partnerships that may use public lands for the benefit of our LMI citizens.

CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	10	6
Number of Special-Needs households to be provided affordable housing units	0	0
Total	10	6

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	10	6
Number of households supported through Acquisition of Existing Units	0	0
Total	10	6

Table 6 – Number of Households Supported

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

The City's CDBG homeless and non-homeless support goals are achieved through the EMRAP Program and the 2023 Community Opportunity Grant Program. These initiatives include housing rehabilitation projects (EMRAP) and grants to non-profits for rehabilitating public facilities that serve homeless and precariously housed low- to moderate-income (LMI) populations, such as individuals with severe and persistent mental illness, women and children fleeing domestic violence, and the disabled.

In Program Year 2023, EMRAP projects provided emergency housing rehabilitation for six (6) households. All PY23 EMRAP funds have been allocated, with an additional five (5) projects underway and expected to be completed early in PY24. Community Opportunity Grant projects completed in PY23 supported the homeless or precariously

housed individuals and severely disabled adults. The beneficiaries included seniors, families, and single adults, in that order of prevalence.

While the City can anticipate the number of EMRAP projects that may be implemented in a year, it is more challenging to predict the applications which will be accepted during the Community Opportunity Grant cycle each year. CDBG funds are available through Community Opportunity Grants to support applications for the Acquisition of Existing Units and Production of New Units. In 2020, Habitat for Humanity submitted an application for a project to support these goals, which is currently in progress. A 269-unit affordable local worker housing development was expected to move forward and utilize all of the PY 23 Community Opportunity Grant funds. They were proposing deed restricted rental units with rents no higher than 80% AMI and had requested \$200,136.00 of the funds; however, they were unable to secure property for the project and withdrew their application. Because that project was not viable, the City had to do another notice of available funding and call for proposals to find projects that met the other goals for PY23.

The City continuously works to achieve the goals outlined in the 5-year Consolidated Plan and Annual Action Plan. Each year, there is a competitive grant process, and the City engages with stakeholder groups before the grant cycle opens, offering several opportunities for technical assistance. These opportunities include public meetings and one-on-one technical support.

In PY22, the public facilities grant awarded to TESH, Inc., was not initiated during the year but was completed in PY23. The Habitat for Humanity 20-unit for-sale townhouse development on 2nd Street, funded by PY20, has fully utilized its funds in PY23, although no units have been sold to date. Note, the project hasn't been closed out officially in IDIS due to the remaining funds and the need to reprogram the funds with City Council approval.

Discuss how these outcomes will impact future annual action plans.

The City has surpassed many goals in its 2023 Annual Action Plan and is currently on target to meet many of the target goals identified by the City's 2023-2027 Consolidated Plan. The production of new housing units for purchase and for rent is a high-level goal for the City's CDBG Grant, and will continue to be a high priority, and the City will continue to seek viable partnerships to create more affordable housing (both for-sale and for-rent) for the community.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	2	0
Low-income	1	0
Moderate-income	3	0
Total	6	0

Table 7 – Number of Households Served

Narrative Information

The City’s EMRAP Program primarily serves low- to moderate-income (LMI) widowed seniors and small families without children, although families with children also make up a small percentage of the households served.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

All work completed using CDBG funds directly benefits low- to moderate-income (LMI) residents, except for administrative costs, which indirectly benefit LMI residents by supporting program administration. The City is required to ensure that at least 70% of the funding benefits the LMI population, and it strives to meet or exceed this requirement each year.

The City focuses on collaborative efforts to reach the maximum number of homeless, unsheltered, or precariously housed individuals, relying on communication with area partners that provide direct services to these populations. The City works closely with local organizations such as St. Vincent de Paul, Idaho Housing and Finance Association (IHFA), the Region 1 Homeless Coalition (Continuum of Care), Habitat for Humanity, Safe Passage, Love INC., and other government and non-profit organizations to identify community needs. The City maintains close contact with all area housing and homeless agencies and stakeholders regarding all aspects of the City's Entitlement Program. Program information is shared in public hearings/forums, Community Opportunity Grants, and Fair Housing Training.

The City's CDBG Administrator attends Region 1 Homeless Coalition Meetings and quarterly IHFA Housing Roundtable meetings. All area agencies are invited to apply for CDBG Community Opportunity Grants when available.

Addressing the emergency shelter and transitional housing needs of homeless persons

Due to the City's relatively limited CDBG funding allocation, the primary focus is on benefiting our low- to moderate-income (LMI) population. All work completed with CDBG funds directly benefits LMI residents, and all CDBG funding received by the City is dedicated to this purpose.

As previously mentioned, the City emphasizes collaborative efforts to reach the maximum number of homeless, unsheltered, or precariously housed individuals, relying on communication with area partners that provide direct services.

For individuals experiencing homelessness and women who are victims of domestic violence, there are five (5) emergency shelters in Kootenai County: Children's Village, St. Vincent de Paul Women & Children's Shelter, St. Vincent de Paul Men's Shelter, the Women's Center, and the OASIS Post Falls Police Department (the only emergency shelter outside of Coeur d'Alene). Together, these shelters provide beds for 68 people in need of housing due to homelessness.

Family Promise of North Idaho is an interfaith initiative that helps homeless families achieve independence. The focus of Family Promise is to keep families together by allowing them to stay 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.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The community's 10-Year Plan to End Homelessness describes the following approaches to combat homelessness in the Coeur d'Alene area, which will continue to be the City's focus areas: (1) Develop better data collection and coordination of agency efforts; (2) Identify and increase the inventory of available affordable housing stock; (3) Improve economic development opportunities and coordinate the response among local governments; (4) Deploy the Housing First model for Permanent Supportive Housing; (5) Create a one-stop-shop to end the practice of having individuals who are struggling and have no transportation from being "bounced" from one agency (and location) to the next when seeking services; (6) Increase community awareness to draw new and concerned voices to the table to help win the battle against homelessness. Several of these goals have been supported through the City's CDBG in the past by partnering with non-profits to create housing access, improving housing conditions, and funding urgent non-profit needs to maintain or improve services. One such example is that CDBG funds were used to purchase the St. Vincent de Paul North Idaho's H.E.L.P. Center where a majority of area homeless services are available.

The Coeur d'Alene School District #271 (District) identified 464 homeless students during the 2023-2024 school year from September of 2023 to June of 2024. Approximately 34.39% of District students currently qualify for free and reduced lunch, which supports that their families are living in varying degrees of poverty. Housing is very important to a child's ability to function in the educational environment. It is, and will continue to be, important to work together to educate families on the availability of community resources needed to secure housing.

The District's McKinney-Vento Program in conjunction with its Hope on the Home Front network of community partners assists families in need; and works toward removing barriers to education caused by poverty. The District connects families directly with community-wide wrap-around support services, such as the weekend food backpack program, food pantries, and community meals; clothing closets, medical, dental and mental health providers, shelters and housing organizations.

District Goal: To end homelessness for children within the District, the District will continue to work with existing housing organizations to seek resources to house families in stable, fixed, and adequate housing; and seek to provide a host of wrap-around community support services with the hope of breaking the generational cycle of homelessness and poverty.

The City promotes workforce development and strongly supports the education corridor, which provides local residents access to four (4) institutions of higher learning: University of Idaho, North Idaho College, Lewis-Clark State College, and Idaho State University. Additionally, the Workforce Development Center and K-Tech offer job training and adult education opportunities beyond standard 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 industry growth to ensure working families can find affordable childcare.

St. Vincent de Paul North Idaho operates a number of programs aimed at the transition to permanent housing and independent living such as the "First Impressions" program that helps those looking for work to look their best. "Project Safe Place" works directly with at-risk-youth and run-away prevention. The local H.E.L.P. Center and the Idaho Department of Labor both serve as resources to connect veterans with services and housing.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The obstacles to meeting underserved needs are as varied as the individuals seeking assistance. As organizations and agencies document program activities, including successes and failures, they adjust processes to incorporate the most effective methodologies and modify or eliminate those that are not working. This ongoing process remains as flexible as possible (within established regulations) to address the specific conditions and circumstances of Coeur d'Alene.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

The Idaho Housing and Finance Association (IHFA) addresses the housing needs of the Idaho Panhandle, including the City of Coeur d'Alene. Their well-regarded service system is highly appreciated in the region.

In Coeur d'Alene, IHFA manages the Section 8 program, currently utilizing 535 vouchers. The waiting list for these housing vouchers is approximately 18-19 months.

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

Although there is no Public Housing within Coeur d'Alene's city limits, the City welcomes all eligible HUD activities related to low- to moderate-income (LMI) residents' housing and/or homeownership. Each year, local non-profits are encouraged to apply for the Community Opportunity Grant to support housing solutions and promote homeownership.

Actions taken to provide assistance to troubled PHAs

The PHA has not been classified as troubled, and the City believes that creating a separate jurisdictional service would be redundant, costly, and inefficient. While the likelihood of failure is unforeseeable, if the current system were to fail, the City would collaborate with the State and local service organizations to develop the best approach for establishing a new system.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

In 2015, a comprehensive review of zoning, land use, and housing policies was conducted alongside a statewide Analysis of Impediments to Fair Housing. The study found no fair housing barriers in Kootenai County. The City of Coeur d'Alene offers even more opportunities for increasing density and affordability compared to the County, indicating no significant fair housing barriers within the City. Since the 2015 Analysis, several updates have been made to support residential investment without imposing excessive zoning ordinances:

- The City permits 800 square foot accessory dwelling units (ADUs) in both residential and commercial zoning districts without requiring special permits.
- A density bonus incentive is available in the Downtown Core, allowing additional housing units that could serve as workforce housing. The City uses a Floor Area Ratio (FAR) calculation to determine allowable livable space in the Downtown Core (DC) zoning district and the three (3) infill overlay districts (DO-N, DO-E, and MO).

In 2019, the City amended the Zoning Code related to ADUs, allowing for increased height in the rear yard from 18 feet to 24 feet if built over a garage. The amendment also revised the owner-occupancy policy, now requiring owner occupancy only if one of the units is a short-term rental. Both units can be rented long-term if desired. This policy encourages the construction of more units and increases the availability of long-term rental opportunities for Coeur d'Alene residents.

The City's legal team reviewed the zoning code in 2019 and confirmed that it does not violate Fair Housing laws or discriminate against protected classes. They recommended that the City evaluate each situation individually, treat all similarly situated persons equally, and make reasonable accommodations when necessary. No significant changes have been made to the Zoning Code since that time, and staff continues to participate in Fair Housing training to keep up-to-speed on fair housing policies that might impact zoning practices.

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

The City continues to work with local organizations such as St. Vincent de Paul North Idaho, Idaho Housing and Finance Association (IHFA), Habitat for Humanity of North Idaho, the Region I Homeless Coalition (aka 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. The H.E.L.P. (Helping Empower Local People) Center is an excellent partner in this process. An innovative partnership led by St. Vincent de

Paul provides office space and basic operating functions in a one-stop shop so that low-to moderate-income (LMI) persons can make inquiries and receive services ranging 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 on-going and as flexible as possible (within the confines of established regulations) to address the conditions and circumstances relevant to Coeur d'Alene. Additionally, the City will continue to support warming shelters and the annual Project Homeless Connect events. The City has chosen to support area seniors in need by provisioning an annual grant to Lake City Center, a senior center which manages the "Meals on Wheels" program to aid seniors struggling with food security in Coeur d'Alene.

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

Pamphlets and fact sheets on lead hazards are distributed, especially to homes with children and in older neighborhoods. All EMRAP applications include the "Protect Your Family from Lead in Your Home" pamphlet. This information is also available on the City's website and Customer Service Center. The CDBG administrator has a list of EPA-approved lead abatement contractors and testing facilities. Applicants are encouraged to ask about lead-paint hazards, though no mitigation has been required for EMRAP projects as most do not need lead abatement, as they either do not disturb paint or are in homes without lead-based paint. Each project is reviewed for lead abatement needs, and the program covers remediation costs if necessary and within grant limits.

The City and our partners distribute lead hazard information, including EPA and Panhandle Health District pamphlets, to homeowners, renters, and landlords. Information has also been provided to the North Idaho Building Contractors Association (NIBCA). Since April 2010, all for-hire construction in child-occupied facilities must comply with the HUD RRP Rule, requiring RRP Certification and additional protocols. The City sponsored EPA RRP training in 2010, certifying 23 individuals, some of whom work on EMRAP projects.

EMRAP grants include \$20,000 for sewer/water projects, \$10,000 for roof repairs/replacements, and \$5,000 for other projects, typically not involving lead paint. Projects like window or door replacements may trigger lead protocols, and the City ensures compliance and evaluates funding for remediation.

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

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 (formerly Jobs Plus) for job creation, and ignite cda for economic development to provide better opportunities within the community. Because transportation costs can be a large portion of the personal budget, the City is a partner with the Coeur d'Alene Tribe and other local jurisdictions in a regional bus system,

CityLink, which provides public transportation at no cost to riders. The City contributes approximately \$104,298.00 annually to the program which provides mid-size buses with rider capacity of 32 passengers, and run established routes from Plummer on US Highway 95 to Coeur d'Alene, Hayden, Post Falls and Rathdrum.

Also, under development is a new 5-Year Sidewalk Improvement Plan which is a continuation of the City's efforts to revitalize LMI areas by incentivizing different modes of travel and supporting increased access for persons with disabilities and supporting "Safe Routes to School" goals.

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

The City of Coeur d'Alene leads the administration of CDBG funding, setting goals under its Consolidated Plan and coordinating City planning and projects with other local agencies. Many services for low- to moderate-income (LMI) individuals, special needs populations, the homeless, and other disadvantaged groups in Coeur d'Alene and Kootenai County are provided through established programs by organizations like the Idaho Housing and Finance Association (IHFA) and the Disability Action Center. Additional programs, such as the H.E.L.P. Center, Supportive Housing Program (SHP), Shelter Plus Care Program, and Emergency Solutions Grant (ESG) Program, are managed by St. Vincent de Paul North Idaho and other local non-profits.

The City believes that agencies like IHFA, which have long served as the region's public housing authority, have effective, proven processes for delivering essential services. The City supports these programs and encourages them to seek assistance when needed, ensuring that its limited resources are used to bolster the existing network of organizations and services.

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

The City of Coeur d'Alene's CDBG administrator attends meetings on a regular basis to foster a network of communication with these agencies and to remain informed regarding local and regional programs. Meetings include the Region 1 Homeless Coalition, ALICE Taskforce, and IHFA Quarterly Housing Roundtable meetings. The City provides support as appropriate and practical, including web postings, sharing information on the City's CDA-TV local broadcast station, distribution of printed materials, consultations, and other aid as requested.

The City collaborates with Kootenai County, Hayden, Post Falls, Rathdrum, the Kootenai Metropolitan Planning Organization (KMPO), and about 30 other organizations to tackle regional housing and growth issues. The Housing Solutions Partnership – previously called the Regional Housing & Growth Issues Partnership, has been working on housing and growth challenges and solutions since April 2021. They conduct research and provide recommendations on housing pressures and potential code amendments. The partnership follows up on findings from the December 2021 Housing Availability and

Affordability Study and the 2023 Next Steps Kootenai County Housing Study. Efforts include evaluating multigenerational housing codes, infill housing codes, short-term rental code modifications, land trusts, and public-private partnerships. In early 2022, a HomeShare project was launched to offer house-sharing opportunities. The City is currently working with the Housing Solutions Partnership and other jurisdictions on a ADU project that would provide four (4) sets of pre-approved ADU house plans that would be available free-of-charge to homeowners in Kootenai County to help reduce the cost of building an ADU.

The City also works with other local organizations such as Coeur d'Alene Area Economic Development Corporation to promote the City as an optimal place to establish a business. The local community college, North Idaho College, and their Workforce Development Center provide opportunities for individuals to upgrade and improve employment skills. The City is working with the University of Idaho, Lewis-Clark State College, and Idaho State University to finalize an education corridor and provide better opportunities for residents to reach a level of education or expertise that will assist them in achieving living-wage employment while creating additional jobs at the colleges.

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

Like many communities, a major barrier to homeownership in Coeur d'Alene is the limited availability of home loans for LMI individuals. The City will continue to support projects seeking LMI tax credits that align with the goals of the Consolidated Plan and will explore additional ways to encourage developers to build LMI housing. Utilizing the latest Housing Needs Assessment, the City aims to establish new partnerships for LMI housing opportunities.

The City also co-sponsors Fair Housing training and education. Annually, the City hosts the Intermountain Fair Housing Council (IFHC) at the Coeur d'Alene Public Library for localized Fair Housing training. The City promotes and supports fair housing education, including the annual Inland Northwest Fair Housing Conference and the IHFA Statewide Fair Housing Conference. Information about these trainings, conferences, and other Fair Housing resources is available on the City's website and shared with stakeholders.

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

Monitoring varies by project and activity. The City regularly communicates with its HUD representative and, as a member of the Northwest Association of Community Development Managers (NWACDM), has a network to ask questions about program activities, compliance issues, and outreach actions. Appropriate monitoring checklists are used for each project to ensure all pertinent questions and concerns are addressed and documented.

The City regularly discusses overall program issues and plans for future activities and requirements, maintaining records of meetings with grantees and sub-recipients, photographic records of projects, and interactions with project participants during planning, implementation, and closeout phases. Questions and concerns are addressed as they arise, and corrective actions are incorporated into the overall communications and monitoring plan. Monitoring is seen as essential and a tool for outreach and public education. Effective communication and documentation are key elements of all projects under the City's Entitlement program, with realistic scheduling being a common issue.

The City is always available to assist grant recipients, ensuring timelines are realistic while meeting HUD's timeliness expectations. Coeur d'Alene has a comprehensive monitoring and technical assistance program to promote communication and accountability, consisting of four (4) components: Pre-Assessment, Desk Monitoring, On-Site Monitoring, and Ongoing Technical Assistance. The sub-recipient review process includes the HUD Exhibit Checklist "K" and OMB Circular A-133 Audits, with the Federal Audit Clearinghouse used for audit and reporting information.

Monitored by HUD in Plan Year 2022, the City developed improved procedures and checklists to ensure compliance and to better inform subrecipients of reporting requirements. This process will continue to be refined to align with HUD's expectations. Grant agreements with all subrecipients include sections on Audit and Monitoring and Retention related to retaining all financial records, supporting documents and statistical records for a period of five (5) years, and subrecipients are put on notice about the possibility of a desk monitoring by City staff during the project to ensure compliance. Moving forward, the City will increase regular monitoring of subrecipients to ensure they stay current on policies, procedures, and timely invoicing.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

According to the City's Citizen Participation Plan, public hearings are held during regularly-scheduled City Council Meetings and are conducted as needed or when required.

The 18 days of public comment period for the PY 2023 CAPER began November 15, 2024, with a legal advertisement in the Coeur d'Alene Press and concluded in the culmination of the Public Hearing with City Council on December 3, 2024. The public was encouraged to attend the hearing and give comments regarding the CDBG program as a whole and on the CAPER for PY 2023 either in person, U.S. mail, or by email. [INFORMATION REGARDING THE NUMBER OF PUBLIC COMMENTS WILL BE INSERTED AFTER THE COMMENT PERIOD CONCLUDES]. All proposed actions under the Entitlement Program were reviewed for compliance under HUD regulations, specifically that they meet a national objective, constitute an eligible activity, and address one of the goals established by the City within its Consolidated Plan.

All documents related to the City's CDBG program can be found at the city's website: www.cdaid.org/cdbg.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

The City of Coeur d'Alene has not changed its goals and/or its objectives and has had no significant negative experiences affecting its CDBG program to date.

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

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

CR-58 – Section 3

Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	0	0	0	0	0
Total Labor Hours					
Total Section 3 Worker Hours					
Total Targeted Section 3 Worker Hours					

Table 8 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA	HTF
Outreach efforts to generate job applicants who are Public Housing Targeted Workers					
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.					
Direct, on-the job training (including apprenticeships).					
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.					
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).					
Outreach efforts to identify and secure bids from Section 3 business concerns.					
Technical assistance to help Section 3 business concerns understand and bid on contracts.					
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.					
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.					
Held one or more job fairs.					
Provided or connected residents with supportive services that can provide direct services or referrals.					
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.					
Assisted residents with finding child care.					
Assisted residents to apply for, or attend community college or a four year educational institution.					
Assisted residents to apply for, or attend vocational/technical training.					
Assisted residents to obtain financial literacy training and/or coaching.					
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.					
Provided or connected residents with training on computer use or online technologies.					
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.					
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.					

Other.					
--------	--	--	--	--	--

Table 9 – Qualitative Efforts - Number of Activities by Program

Narrative

The City of Coeur d’Alene’s entitlement funds do not currently support any housing activities that meet the Section 3 requirements threshold of \$200,000, so no reporting is recorded in this section of the CAPER for Plan Year 2023.

###