

City of Coeur d'Alene, ID

**2022 Consolidated Annual Performance and Evaluation
Report (CAPER) for the Community Development Block
Grant (CDBG) Program**

DRAFT DOCUMENT FOR PUBLIC REVIEW THROUGH DECEMBER 20, 2023

Prepared by Coeur d'Alene's Planning Department

NOTE:

The CAPER will be available for review and public comment through December 20, 2023. There will be a public hearing at the regular meeting of the City Council on December 19, 2023 at 6pm in the Library Community Room (702 E. Front Ave.).

Comments on the updated plan can be emailed to Hilary Patterson, Community Planning Director, at hpatterson@cdaid.org, or sent to City Hall (710 E. Mullan Ave.) attention Hilary Patterson, Planning Department. Verbal comments can be provided by calling 208-769-2270.

DRAFT DATE: 12/5/23

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 2022 Program Year Consolidated Annual Performance and Evaluation Report (CAPER) for the city of Coeur d'Alene (City) is presented in conformance with the required format and template. Community Development Block Grant (CDBG) grantees are required to respond each year in order to be compliant with Federal Regulations. This is for Program Year 2022 (PY22), July 1, 2022 to September 30, 2023. The City's Plan Year was changed to a start date of October 1, beginning in 2023, which extended the end date for 2022 to September 30, 2023 rather than the previous end date of June 30, 2023.

The CAPER may be used by City residents to obtain performance of funded housing and community development projects during PY22. The City has participated in CDBG since 2007. The community benefits by providing programs and services that benefit low- and moderate-income persons/households.

The City received entitlement funding in the amounts of \$349,112 for PY22 (CDBG). The City of Coeur d'Alene established 6 guiding goals in its 2022 Annual Action Plan, including: 1) Increase the Supply of Affordable For-Sale Housing; 2) Increase the Supply of Affordable Rental Housing; 3) Improve the City's Sidewalks to make them more accessible to persons with disabilities; 4) Continue with neighborhood revitalization efforts to improve the condition of housing in low-income areas; 5) Expand higher-paying employment opportunities for residents of Coeur d'Alene through economic development; and 6) Offer Public Service Program assistance to service organizations supporting low and moderate-income residents of Coeur d'Alene.

Funded goals in the 2022 Plan Year included Neighborhood Revitalization – Housing Rehabilitation, Public Facility, and Public Service.

Completed activities in PY22 include:

- Lake City Center was awarded \$10,000 for the Meals on Wheels program as a non-competitive grant (Public Service)
- Emergency Minor Home Repair and Accessibility (EMRAP) – nine (9) were funded and completed with 2022 funds (under the Neighborhood Revitalization goal) and an additional four (4) were funded with 2020 and 2021 funds and completed in PY22, for a total of 13 EMRAP projects.

Other activities that were selected through the competitive grant process for PY22 funds, but the funds were not entirely drawn down, included:

- Tesh - public facility (lighting project): \$63,944.00 – no work has been done to date on this project
- St. Vincent de Paul – public facility (homeless facilities – restroom and conference room rehabilitation): \$188,423

No funds were allocated to For-Sale Housing, For-Rent Housing, Sidewalks, or Economic Development in PY22.

A total of \$133,303.09 was drawn down from PY22 funds, as shown in attached PR05 reports:

- Nine (9) EMRAP projects with 2022 funds: \$42,139.40 (Note: Four other EMRAP projects were completed in PY22 with funds from PY20 and PY21)
- Meals on Wheels: \$10,000.00
- General Administration: \$69,822.00
- EMRAP Administration: \$11,341.69

Additionally, the City had remaining funds from its allocations of CDBG CARES or CDBG-CV (COVID-19) funding in the amount of \$51,911.95 which was leveraged to help fund the needs of a childcare scholarship, rental subsistence and emergency sheltering. CDBG-CV drawn was \$46,412.95 with the remaining funds used for the CDAIDE subsistence payment in the amount of \$20,447.29 and \$25,965.66 in CV administration to close out the grant funds. The subsistence payments completed in PY22 benefited four (4) LMI individuals.

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
1-Increase For Sale Affordable Housing	Affordable Housing	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0				
1-Increase For Sale Affordable Housing	Affordable Housing	CDBG: \$	Homeowner Housing Added	Household Housing Unit	0	0				
1-Increase For Sale Affordable Housing	Affordable Housing	CDBG: \$	Direct Financial Assistance to Homebuyers	Households Assisted	0	0		10	0	0.00%
2-Increase Affordable Rental Housing	Affordable Housing Homeless Non-Homeless Special Needs	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0				
3-Sidewalk Accessibility	Affordable Housing Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	600	790	131.67%			

4- Neighborhood Revitalization	Affordable Housing Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	10466		200	8567	4,283.50%
4- Neighborhood Revitalization	Affordable Housing Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0				
4- Neighborhood Revitalization	Affordable Housing Non-Housing Community Development	CDBG: \$	Rental units rehabilitated	Household Housing Unit	0	0				
4- Neighborhood Revitalization	Affordable Housing Non-Housing Community Development	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	35	64	182.86%	12	13	108.33%
5-Economic Development	Non-Housing Community Development	CDBG: \$0	Businesses assisted	Businesses Assisted	10	15	150.00%			

6-Public Service	Affordable Housing Homeless Non-Homeless Special Needs	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	100	2071	2,071.00%	220	378	171.82%
6-Public Service	Affordable Housing Homeless Non-Homeless Special Needs	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	10	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 high priority for the City of Coeur d'Alene's 2018-2022 Consolidated Plan. The City’s popular EMRAP program assists homeowners in Coeur d’Alene with housing stability by providing maintained or improved livability measures in homes. The City has exceeded its 5-year goal for of 35 homes assisted with EMRAP, with 76 EMRAP projects completed at the end of PY22. The City relies on area partners to collaborate on more expensive projects such as increasing for sale affordable housing and increasing the supply of affordable rental housing.

Area partners have the opportunity to apply to the Community Opportunity Grant, funded by the City's CDBG Grant. Eligible applications would include activities that would support both of these key goals. Applications for eligible Public Service and Economic Development activities are available each year via the City's Community Opportunity Grant.

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	8,844
Black or African American	19
Asian	9
American Indian or American Native	35
Native Hawaiian or Other Pacific Islander	7
Total	8,914
Hispanic	50
Not Hispanic	8,853

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

Narrative

According to the most current ACS Demographic Data, Coeur d'Alene has a minority population of approximately 12.3%, which includes all races other than "White". The City does not allow for discrimination of any kind based on race or ethnic background. A large number of projects completed with CDBG funds benefit seniors, including the Meals on Wheels program and the EMRAP program. These programs are based on income levels, not on ethnicity, and although we have an approximately 9% minority population, this number does not always reflect in the applications and projects that are completed. Any and all documents, including applications for Community Opportunity Grants and the Emergency Minor Repair and Accessibility Program, 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	349,112	133,303

Table 3 - Resources Made Available

Narrative

The City's 2022 entitlement allocation was \$349,112. In PY 2022, only \$133,303.09 was expended of the 2022 allocation. This was due to the public facilities project with TESH not getting started. Prior year resources were also programmed to spend down those funds.

In PY22, \$46,412.95 was spent from CDBG-CV funds.

In PY22, \$440,684.99 was spent from entitlement from years 2020-2021 in the following amounts (see PR26):

PY20: \$82,076.17

PY21: \$358,608.82

In PY22, the total activities disbursed was \$588,133.60, with \$298,313.29 in open activities and \$289,820.31 in completed activities.

Drawdowns were made for the following projects from 2022 funds:

- Meals on Wheels Annual Grant in the amount of \$10,000
- EMRAP: \$42,139.40

In 2020, CARES Act Funds were made available in the amount of \$446,799. During Plan Year 2022, the CV funds were fully expended with \$20,447.29 for Subsistence Payments to CDAIDE and \$25,965.66 in CV Administration.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description

Table 4 – Identify the geographic distribution and location of investments

Narrative

The City of Coeur d'Alene does not have established Target Areas or Neighborhood Stabilization Program areas. The homes assisted with EMRAP were located in various locations throughout the City and were not targeted for concentration in any one area, however, several EMRAP projects were completed in an LMI census tract which houses 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.

The City of Coeur d'Alene does not require matching funds for projects under the 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 partnerships that may use public lands for the benefit of their 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	0
Number of Special-Needs households to be provided affordable housing units	0	0
Total	10	0

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	0
Number of households supported through Acquisition of Existing Units	0	0
Total	10	0

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 were exceeded by the City's EMRAP Program as well as its 2022 Community Opportunity Grant program via housing rehabilitation projects (EMRAP) and by the provision of grants to non-profits for rehabilitation to public facilities serving the following homeless and precariously housed LMI populations: persons with severe and persistent mental illness and women and children fleeing domestic violence as well as the disabled population.

There were 13 EMRAP projects completed in PY 2022 supporting 13 households with a combination of funds from grant years 2020, 2021 and 2022. Community Opportunity Grant projects completed in PY 2022 supported people who were homeless or precariously housed. Families comprised of the following (from greatest served to least): seniors, families, single adults.

Though the City can anticipate how many EMRAP projects may be implemented in one year it is more difficult to gauge the applications that may be accepted during the Community Opportunity Grant cycle for each year. CDBG funds are available through the Community Opportunity Grants to support applications for Acquisition of Existing Units and Production of New Units; in 2020, there was one application brought forward by Habitat for Humanity for a project to support these goals, and is currently in process.

The City works to accomplish the goals from the 5-year Consolidated Plan and Annual Action Plan on an ongoing basis. Each year there is a competitive grant process. The City reaches out to stakeholder groups before the grant cycle is open and provides several opportunities each year for technical assistance. These opportunities range from public meetings as well as one-on-one technical support.

In PY22, the public facilities grant awarded to TESH was unable to get initiated during the year. The Habitat for Humanity project with funding from PY20 is still not spent down fully due to construction and other project funding delays.

Discuss how these outcomes will impact future annual action plans.

The City has surpassed many goals in its 2022 Annual Action Plan and is currently on target to meet many of the target goals identified by the City's 2018-2022 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.

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	3	0
Low-income	6	0
Moderate-income	0	0
Total	9	0

Table 7 – Number of Households Served

Narrative Information

The City's EMRAP Program serves a majority of LMI widowed seniors as well as small families without children, although families with children do comprise a small percentage of 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 are for the direct benefit of LMI residents with the exception of our administrative cost, which are used to administer the program to indirectly benefit LMI residents. The City is required to have a minimum of 70% of the funding benefit the LMI population, and the City strives to make sure to reach or exceed this requirement each year.

The City focuses on collaborative efforts to reach the maximum homeless and unsheltered aid and relies on communication with area partners that offer direct service to those individuals.

The City works closely with local organizations such as St. Vincent de Paul, 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 areas of need in the community. The City keeps close contact with all of the area housing and homeless agencies and stakeholders on all facets of the City's Entitlement Program including public hearings/forums, Community Opportunity Grants and Fair Housing Training.

The City's CDBG Administrator attends the Region 1 Homeless Coalition Meetings as well as the 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 main focus for use of these funds is our City's LMI population. All work completed using CDBG funds are for the benefit of LMI residents, with the exception of our administrative cost. The great majority of all of the City's CDBG funding received is used to benefit our LMI residents.

The City focuses on collaborative efforts to reach the maximum homeless and unsheltered aid and relies on communication with area partners that offer direct service to those individuals.

The City works closely with local organizations such as St. Vincent de Paul, 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 areas of need in the community. The City keeps close contact with all of the area housing and homeless agencies and stakeholders on all facets of the City's Entitlement Program including public hearings/forums, Community Opportunity Grants and Fair Housing Training.

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

For persons experiencing homelessness and women who are domestic violence victims, there are five emergency shelters in the County to assist them: 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 (which is the only emergency shelter located outside of Coeur d'Alene). Together, these shelters provide beds for 68 people in need of housing because they are homeless.

Family Promise of North Idaho is an interfaith effort to assist homeless families in achieving 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.

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, 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 HELP Center where a majority of area homeless services are available.

The Coeur d'Alene School District #271 identified over 550 homeless students in 2022. Forty-one percent of the District families are living in various degrees of poverty. It is, and will continue to be, important to work together to surround the families with needed services and long-term housing opportunities. Housing is very important to a child's ability to function in the educational environment.

The School District's Hope on the Homefront program assists families in need and work toward

removing barriers to education caused by poverty. Through the use of school counselors, the District has been able to connect families with services. Often older students are connected directly to services, such as food backpack programs.

Goals/Benchmarks:

- To end homelessness for children within the School District. Strategies: The School District will continue to work with existing organizations to seek resources to house families and provide long term needed assistance.
- Break the generational cycle of homelessness and poverty.

Strategies:

(1) The School District will work with the homeless coalition and existing organizations to establish a job-training program for parents as well as youth;

(2) Continue to provide and increase the number of after-school programs (e.g., CDA for Kids).

(3) Educate children and families to look at long-term goals. Strategies: A financial literacy program would help to educate families to look toward long-term goals.

(4) Continue to train District staff regarding the needs of homeless students. Strategies: Provide training materials and contact information.

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 HELP Center and the 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 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 (within the confines of established

regulations) as possible to address the conditions and circumstances specific to Coeur d'Alene.

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 the Workforce Development Center and K-Tech offer 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.

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

Actions taken to address the needs of 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. IHFA indicated that there are 533 vouchers leased up in the City of Coeur d'Alene and the waiting list is approximately 18-19 months.

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

While no Public Housing exists within Coeur d'Alene City limits, the City is open to all eligible HUD activities relating to housing and homeownership and LMI residents. Local nonprofits are encouraged annually to apply for the Community Opportunity Grant and support housing solutions and homeownership.

Actions taken to provide assistance to troubled PHAs

The PHA has not been designated as troubled, and the City feels it would be redundant, expensive, and inefficient for the City to attempt to create a jurisdictional service separate from the current program. The likelihood of failure is unforeseeable; however, if the system were to fail, the City would work with the State and local service organizations to determine the best method of forming 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)

A zoning, land use, and housing policy review was completed in conjunction with a statewide Analysis of Impediments to Fair Housing in 2015. The statewide study revealed that there are no fair housing barriers in Kootenai County. The City of Coeur d'Alene provides even more options for developing density and increasing affordability than the County, indicating that there are no major fair housing barriers in the City. There have been updates since the 2015 Analysis with the current policies below supporting residential investment without excessive zoning ordinances:

- The City allows for 800 SF accessory dwelling units (ADU) in residential and commercial zoning districts. Special permits are not required to build an ADU.
- The City has a density bonus incentive in place in the Downtown Core to allow additional housing units which could be made available as workforce housing. The City has a Floor Area Ratio (FAR) calculation used to determine allowable livable space on any given lot in the following areas: Downtown Core (DC) zoning district and the three infill overlay districts (DO-N, DO-E, and MO).

In 2019 the City adopted an amendment to the Zoning Code related to Accessory Dwelling Units (ADUs). The amendment allowed additional ADUs to be built by allowing an increased height in the rear yard from 18 feet to 24 feet if over a garage. It also changed the owner-occupancy policy that previously existed. The amended code now only requires owner occupancy if one of the units is a short-term rental. Both units can now be rented long term, if desired. This policy in its current form incentivizes more units to be built and incentivizes a greater number of long-term rental opportunities to become available to residents of Coeur d'Alene.

The City's legal team reviewed the zoning code in 2019 and determined that the code, as written and applied, does not result in any Fair Housing violations and/or discriminate against protected classes. It was recommended that the City has to look at each situation on a case-by-case basis and treat all similarly situated persons alike and make reasonable accommodations in appropriate cases.

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, IHFA, 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 lead 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 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 Couer d'Alene.

The City promotes education and training that supports and sponsors fair housing, including the annual Inland Northwest Fair Housing Conference and the IHFA Statewide Fair Housing Conference. Links and information regarding trainings and conferences and other Fair Housing resources were posted on the City's website at <https://www.cdavid.org/76> and was shared with the stakeholder list.

Coeur d'Alene is also working with Kootenai County, Hayden, Post Falls, Rathdrum, Kootenai Metropolitan Planning Organization (KMPO) and about 30 organizations to address regional housing and growth issues. A partnership has been formed and began meeting in April 2021. This group, called the Regional Housing & Growth Issues Partnership, will help do research and come up with recommendations related to housing and growth pressures, and possible code amendments. Connect Kootenai on Housing & Growth (formerly the Regional Housing and Growth Issues Partnership) continues to meet monthly, with additional monthly meetings with the working group. The partnership is following up on the findings and recommendations from the December 2021 Housing Availability and Affordability Study for Kootenai County and the new 2023 Next Steps Kootenai County Housing Study. 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 just launched in early 2022 to provide house sharing opportunities.

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

All EMRAP applications that are mailed or handed to potential clients include a "Protect Your Family From Lead in Your Home" pamphlet. The CDBG administrator also has a list of EPA approved and certified lead abatement contractors that can be used if needed as well as lead testing facilities to complete lead clearance exams if required. Applicants are encouraged to ask questions regarding lead-paint hazards, though no mitigation has every been required of to-date projects implemented with the City's EMRAP program.

Most EMRAP projects do not require lead abatement, as they either do not disturb the paint or are performed in homes that do not contain lead-based paint due to the age of the home. Each project is

reviewed to determine whether lead abatement will be necessary. The EMRAP program would pay for the remediation if necessary and within the threshold of the maximum grant amount.

Program procedures include distribution of pamphlets and fact sheets on lead-based paint hazards, specifically to homes with children and older neighborhoods with potentially higher incidence rates of poisoning.

The City has provided pamphlets and information to the North Idaho Building Contractors Association (NIBCA). Beginning in April 2010, all for-hire construction work in child-occupied facilities must comply with the HUD Renovation, Repair and Painting (RRP) Rule, which requires that any person performing Consolidated Plan COEUR D'ALENE 122 OMB Control No: 2506-0117 (exp. 09/30/2021) this type of work must receive RRP Certification and perform additional recordkeeping and site cleanup. In 2010 the City sponsored an EPA RRP training for local contractors. Of the 23 individuals who received certification, some have been contractors working on EMRAP projects.

The City and area partners all distribute information on lead based paint hazards, precautions and symptoms, including the U.S. Environmental Protection Agency's (EPA) pamphlet, Protect Your Family From Lead In Your Home and Panhandle Health District's pamphlet Elevated Blood Lead Information and Prevention to all homeowners, renters, and landlords involved in housing services and rehabilitation. Lead hazard information is also available on the City's web page and within their Customer Service Center where building permits are issued.

The City of Coeur d'Alene, under the EMRAP provides information on lead based paint hazards to all homeowners funded under the program where the home was constructed prior to 1978. In addition, if and when all pre-1978 housing is purchased by the City or CDBG-funded organizations as part of affordable/workforce housing programs, the City/Organization will test the housing for lead-based paint hazards, provide a risk assessment, and conduct mitigation if warranted.

There are \$10,000 EMRAP grants available for sewer lateral projects, all other EMRAP grants are limited to \$5,000 per homeowner, which tends to limit the types of projects to those not involving lead based paint. EMRAP projects are typically a reroof, a plumbing project in a bathroom, an accessibility project, an HVAC unit, water heater, and similar projects. Other EMRAP projects such as window or door replacement may trigger lead based paint. If a project is determined to have lead based paint, the City would require that the contractor follow all required protocols, and would evaluate if there is funding through the EMRAP grant program to pay for the remediation as well as the project.

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

The City supports the local Head Start agency and agrees that education is an important step in eliminating the cycle of poverty. 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. The City contributes approximately \$43,990 annually to the program plus they pay annual dues of \$9,955 to CityLink. Mid-size buses, approximately 32 passengers, run established routes from Plummer on US Highway 95 to Coeur d'Alene, Hayden, Post Falls and Rathdrum.

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. Also, there is a new 5-Year Sidewalk Improvement Plan under development to continue the City's ongoing 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's belief is that agencies such as IHFA, that have been acting as the region's public housing authority 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 of Coeur d'Alene is the lead agency for the CDBG funding. The City has established goals under their Consolidated Plan, and will work to integrate City planning, and projects with the related activities of other agencies in the area. Many of the activities to assist low/moderate income persons, special needs individuals, the homeless, and other disadvantaged groups in Coeur d'Alene and Kootenai County area are delivered through well-established programs under the direction of established organizations and agencies such as Idaho Housing and Finance Association (IHFA) and the Disability Action Center. Other programs such as the H.E.L.P. Center, Supportive Housing Program (SHP), Shelter Plus Care Program and Emergency Solutions Grant Program (ESG) are overseen by St. Vincent de Paul North Idaho, or other local not for profit organizations.

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, along with their CDBG administrator, attends meetings on a regular basis to foster a communication network with these agencies and to remain informed regarding local and regional programs; these meetings include the Region 1 Homeless Coalition meetings and the IHFA Quarterly Housing Roundtable meetings. The City provides support as appropriate and practical, including web postings, information on the City's CDATV local broadcast station, distribution of printed materials, consultations and other aid as requested. Habitat for Humanity is represented on city committees for zoning code amendments related to affordable and attainable housing.

Identify actions taken to overcome the effects of any impediments identified in the

jurisdictions analysis of impediments to fair housing choice. 91.520(a)

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. With the help of the City's most recent Housing Needs Assessment, the City hopes to be able to start new partnerships for LMI housing opportunities.

As with most communities, the major barrier facing households and individuals trying to obtain homeownership are the limitations regarding home loans for low/moderate income persons. The City has an excellent record of working with local organizations such as Coeur d'Alene Area Economic Development Corporation (formerly Jobs Plus) to promote the City as an optimal place to establish a business. The local community college (North Idaho College) and 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.

The City continues to co-sponsor Fair Housing training and education. The City, along with Spokane County, the City of Spokane, the State of Washington, the Northwest Fair Housing Alliance, the Spokane Low Income Housing Consortium and HUD sponsor a large fair housing conference held in Spokane, WA annually during Fair Housing Month. This event is well established with an average attendance of 350 people over its first four years. While Spokane is in another state, it is a short 30 minute commute and is a regional hub that shares many of the same population and service providers as Coeur d'Alene. The City additionally hosts Intermountain Fair Housing Council annually in the Coeur d'Alene downtown's library to have them provide localized training on Fair Housing. The City hosted a Fair Housing Training in on June 22, 2023 at Heritage Health in Coeur d'Alene. The training was provided by Intermountain Fair Housing Council.

The City will implement an Affirmatively Furthering Fair Housing Plan when appropriate. They have created a "working group" to help determine the City's biggest Fair Housing issues that currently exist.

Future plans include a group of public forums held throughout the city to obtain input from the citizens of Coeur d'Alene. As no guidance is definitive on the AFFH rule currently, however, the City has not made significant steps towards this Plan.

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 can vary by project and activity. The City communicates with the Housing and Urban Development Agency (HUD) and the Northwest Association of Community Development Managers (NWACDM) members either by phone or email regarding program activities, compliance issues, and outreach actions. The City uses the appropriate monitoring checklists for the individual projects to ensure that pertinent questions and concerns are addressed and documented.

The City regularly discusses overall program issues and plans for future activities and requirements. Records are maintained at the City and funding agencies. The City maintains records of meetings with grantees and sub-recipients, photographic records of projects as they are implemented, and meets with project participants during the planning, implementation, and closeout phases, as well as, on request should partners have questions, concerns or suggestions. The City feels monitoring is essential and can be used as a tool for outreach and public education. Communication (with documentation) is a key element of all projects undertaken through the City's Entitlement program. Questions and concerns are addressed as they arise, and when a programmatic issue is identified, actions to correct the item are incorporated into the overall communications and monitoring plan. Determining realistic schedules has been the most common issue to be addressed.

The City is always available to answer questions for grant recipients and assist to ensure timelines are realistic in nature, while meeting HUD's expectations for timeliness. The City of Coeur d'Alene has instituted a comprehensive monitoring and technical assistance program designed to promote communication and accountability. The monitoring process consists of four components: 1) Pre-Assessment, 2) Desk Monitoring, 3) On-Site Monitoring, and 4) Ongoing Technical Assistance. Administrators under the City of Coeur d'Alene's CDBG Entitlement Program have added to their sub-recipient review process the HUD Exhibit Checklist K, OMB Circular A-133 Audits of States, Local Governments, and Non-Profit Organizations. The Federal Audit Clearinghouse will be used to obtain audit and reporting information.

The City was monitored by HUD in 2022 and came up with improved procedures and checklists to ensure compliance, and to better inform subrecipients of reporting requirements. The City will continue to refine this process to be in line with HUD's expectations.

In 2022, we worked with several subrecipients as part of the HUD monitoring to review files. Moving forward, the City will be doing more monitoring of the subrecipient on a regular basis to ensure they are up to date on policies, procedures and invoicing submissions.

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 required.

The public comment period for the PY 2022 CAPER began December 5, 2023 with a legal advertisement in the Coeur d'Alene Press and concluded on December 20, 2023 with a public hearing with the City Council on December 19, 2023. The public was encouraged to attend the hearing and give comments regarding the CDBG program as a whole and the CAPER for PY 2022 either in person or by email. No public comments were received either in person or by email. 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-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.					
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Table 9 – Qualitative Efforts - Number of Activities by Program

Narrative