



City of Coeur d'Alene
Consolidated Plan
Program Years 2013-2018

February 12, 2013

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ATTACHMENTS

1 Community Stakeholders/Interested Groups

2 Citizen Participation:

- Citizen Participation Plan
- Citizen Survey
- Public Comments
- Public Notices
- Public Forum Attendance Sheets
- Public Forum Presentation
- City Council Workshop Presentation

3 2011 Analysis of Impediments to Fair Housing Choice

Executive Summary

ES-05 Executive Summary

1. Introduction

The City of Coeur d'Alene became eligible to receive Federal Community Development Block Grant (CDBG) funds in 2007, resulting in the first Consolidated Plan for Program Years 2008-2012. This is the second five-year Consolidated Plan encompassing Program Years 2013-2018. The purpose of the Consolidated Plan is to:

1. Identify the City's housing and community development needs, priorities, goals, and strategies; and
2. Stipulate how funds will be allocated to housing and community development activities to address the City's housing and community development needs.

This Consolidated Plan for PY 2013-2018 was prepared in accordance with Sections 91.100 through 91.230 of the U.S. Department of Housing and Urban Development's (HUD) Consolidated Plan Final Rule.

While the City's population and sophistication have reached the echelon of entitlement status, Coeur d'Alene retains the small town "feel" and ability to work with the community for the betterment of its Low and Moderate-Income (LMI) Citizens beyond CDBG funding. The City's Entitlement allocations have not been large enough to fund, in their entirety, substantial housing projects, rehabilitation on a neighborhood size scale, or healthy economic development projects. As a result, the City focuses on partnerships and collaboration where their modest funding may tip the balance toward a successful project. The City of Coeur d'Alene has made a commitment to support and promote activities and programs that benefit LMI residents and all citizens. The City advocates education and outreach to create a strong, involved and aware populous who want to participate in community improvement. Furthermore, the City hopes for consistent growth of the Entitlement Program with widespread benefits through increased participation from stakeholders, innovative proposals and North Idaho enthusiasm.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

Cost burden greater than 30% and greater than 50% is the largest housing problem in Coeur d'Alene, solidifying the need of additional affordable housing stock in the City. According to the U.S. Census Bureau's American Community Survey (ACS), the 2009 median value of housing was \$207,000, while the median income was only \$38,410. The estimated five-year housing needs include affordable housing for the LMI, elderly and non-homeless special needs populations; and additional transitional housing and emergency shelter facilities. These needs were determined based on the 2011 Analysis of Impediments to Fair Housing Choice prepared by BBC Consulting, Inc. (BBC); feedback from the public forums; consultation with St. Vincent de Paul, Disability Action Center, and Idaho Housing and Finance Association (IHFA); and HUD data tables included in this Plan.

3. Evaluation of past performance

All projects and activities for Plan Years 2008-2012 progressed as anticipated. The only goal not receiving CDBG funding in this time period was under economic development. Although the City is open to economic development projects submitted through the Community Opportunity Grant program, or suggestions from businesses or citizens, to date no requests have been identified or brought forward. The City believes that funding is not substantial enough to encourage economic development projects. If larger allocations become available in the future, it is believed more opportunities would arise. The goals in this Consolidated Plan were based on the success of the past five years, with Goals 1-5 remaining the same, with the addition of Goal 6 as a result of participation from Continuum of Care Providers. Specifically, the following six top-level goals have been established to guide in the Consolidated Plan funding during Program Years 2013-2018:

Goal 1: Increase the supply of for-sale housing at prices affordable to the City's low and moderate-income workers.

Goal 2: Increase the supply of rental housing affordable to the City's extremely low-income renters and residents with special needs, including persons who are homeless.

Goal 3: Improve the City's sidewalks to make them more accessible to persons with disabilities.

Goal 4: Continue with neighborhood revitalization efforts to improve the condition of housing in low-income areas.

Goal 5: Expand higher-paying employment opportunities for the residents of Coeur d'Alene through economic development.

Goal 6: Offer Public Service Program assistance to service organizations supporting low and moderate-income residents of Coeur d'Alene.

4. Summary of citizen participation process and consultation process

The City of Coeur d'Alene followed their Citizen Participation Plan to hold two public forums. Overall, 122 organizations, stakeholders and units of government were contacted for input on the development of the Consolidated Plan. The City placed two newspaper advertisements in each the Coeur d'Alene Press and the Nickel's Worth, plus postings on the City's website and Government Education Channel requesting public participation in two forums to gather information about the City's greatest housing and community development needs, including special needs populations. In addition, flyers were posted at local tax credit apartments and HUD 811 and 202 sites. Two citizens attended the first public forum and nine persons representing Continuum of Care providers attended the second public forum.

In addition to local issues, the City contacted several Local and State government agencies to address regional issues.

Fifty-two (52) community members completed an online survey through Survey Monkey to assist in determining needs of the CDBG Program. The consultations, public forums and survey are the basis of addressing priority needs in this Consolidated Plan.

Two public hearings were held on the PY 2013-2018 Consolidated Plan and PY 2013 Action Plan in accordance with the City's Citizen Participation Plan. The first public hearing, held December 18, 2012, presented the findings from the public forums and citizen input, and provided the opportunity for additional Citizen Comment prior to publication of the Draft Consolidated Plan to the City's website on December 19, 2012. The second public hearing, held January 15, 2013, presented an overview of the PY2013-2018 Consolidated and PY 2013 Action Plan. The public comment period commenced January 2, 2013 and ended February 2, 2013. Each of the public hearings and comment period were advertised through the local newspaper of record (Coeur d'Alene Press), City Website, CDATV, and email notification to the City's distribution list of Stakeholders/Interested Groups.

5. Summary of public comments

Participants in the public forums demonstrated agreement with the Goals from the 2008-2012 Consolidated Plan, and indicated a need for a new goal aimed at Public Service/Continuum of Care type projects, such as transitional housing, American's With Disabilities Act (ADA) barriers and lack of housing stock for the very low-income populations.

Comments from the on-line survey included suggestions for more housing counseling, housing education, detoxification facility, low interest loans for LMI entrepreneurs, dental program for those without insurance, major life transitions, and programs for seniors and disabled. Two comments stated that the City should not be accepting Federal funds; however, two other comments were highly complimentary of the program.

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

Three comments were not accepted. The first was a verbal plea from Continuum of Care providers to increase funding for public transportation. Once the process of meeting one of the HUD National Objectives, eligible activities, and reporting requirements were explained; coupled with the fact that currently the local transportation is free to the public, it was agreed that increasing funding for public transportation is not the best use for CDBG funds.

The second comment was a request to provide medications for substance abuse. This was rejected as it will not meet the HUD National Objectives and eligible activities under the CDBG program. The third, regarding a dental program for those without insurance, was rejected for the same reasons—inability to meet the HUD National Objectives.

7. Summary

This document reflects coordinated planning and citizen participation, and also aims to reduce duplication of efforts at the local level and provide smoother delivery of services. It allows community organizations, citizens, and developers to better grasp the context in which the City's CDBG program operates. With this tool, organizations are better able to shape various programs into effective and coordinated regional, local, community and neighborhood strategies over the next five years. This Consolidated Plan aims to create and expand opportunities for every citizen in Coeur d'Alene, particularly those facing additional challenges due to income, illness or special needs.

The Process

PR-05 Lead & Responsible Agencies

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	COEUR D'ALENE	Administration
CDBG Administration	PANHANDLE AREA COUNCIL	

Table 1 – Responsible Agencies

Narrative

The City of Coeur d'Alene is under contract with Panhandle Area Council for preparation of the Consolidated Plan and administration of the CDBG funds.

Consolidated Plan Public Contact Information

- Nancy Mabile, Panhandle Area Council, 11100 N. Airport Drive, Hayden, ID 83835; email: nancy@pacni.org; phone: 208-772-0584 ext 3014, and
- Renata McLeod, City of Coeur d'Alene, 710 Mullan Avenue, Coeur d'Alene, ID 83814; email: renata@cdaid.org; phone: 208-666-5741

PR-10 Consultation

1. Introduction

The City of Coeur d'Alene Administration Department oversaw the completion of the City's second Consolidated Plan. The City retained Panhandle Area Council of Hayden, Idaho to assist with the completion of the Plan as part of its grant administration contract.

The Consolidated Plan was developed with a strong emphasis on community input. One hundred twenty-two (122) organizations, units of government and stakeholders were contacted during the development of the Consolidated Plan. The entire list of Community Stakeholders/Interested groups is included as Attachment 1. The City also consulted with organizations that assist special needs and low-income populations, such as the Disability Action Center and St. Vincent de Paul. Each of the aforementioned agencies/organizations plus local tax credit apartments and HUD 811 and 202 sites were emailed a flyer to post and distribute within their organization to promote participation in the Consolidated Planning Process. During the 30-day public comment period, the Consolidated Plan was posted on the City's website and available for review at City Hall.

Summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies

The City held two public forums to gather information about the City's greatest housing and community development needs, including the needs of special populations. The public forums included an identification of gaps that are not being met, yet could be potentially eligible for CDBG funding in the areas of housing, community and economic development. Seven organizations/stakeholders representing special needs and low-income populations were represented at the forums.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

The Region I Homeless Coalition, headed by St. Vincent de Paul, covers all five counties of North Idaho. The City regularly attends their meetings for awareness and coordination to address the needs of the homeless and persons at risk of homelessness within Coeur d'Alene.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

St. Vincent de Paul of North Idaho receives and allocates Emergency Shelter Grant (ESG) funds. The City does not develop performance standards, evaluate outcomes or develop funding, policies and procedures for the administration of HMIS, as it does not administer HMIS.

2. Agencies, groups, organizations and others who participated in the process and consultations

Agency/Group/Organization	Agency/Group/Organization Type	What section of the Plan was addressed by Consultation?
ST. VINCENT DE PAUL	Housing	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
North Idaho Housing Coalition	Housing	Housing Need Assessment
COMMUNITY ACTION PARTNERSHIP	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless	Housing Need Assessment
HABITAT FOR HUMANITY	Housing	Housing Need Assessment Market Analysis
FAMILY PROMISE	Services-homeless	Homeless Needs - Families with children
TRINITY GROUP HOMES	Housing	Housing Need Assessment
KOOTENAI MEDICAL CENTER	Health Agency Major Employer	Non-Homeless Special Needs
TESH, Inc.	Services-Persons with Disabilities	Non-Homeless Special Needs
LAKE CITY SENIOR CENTER	Services-Elderly Persons	Non-Homeless Special Needs
NIC WORKFORCE DEVELOPMENT	Services-Education	Economic Development
WHITEWATER CREEK	Housing	Housing Need Assessment Market Analysis
IDAHO HOUSING AND FINANCE ASSOCIATION	Housing	Housing Need Assessment Market Analysis
KOOTENAI COUNTY	Other government - County	Housing Need Assessment Economic Development Market Analysis
POST FALLS	Other government - Local	Housing Need Assessment Economic Development Market Analysis
HAYDEN	Other government - Local	Housing Need Assessment Economic Development Market Analysis
DEPARTMENT OF COMMERCE	Other government - State	Economic Development
PANHANDLE HEALTH DISTRICT	LEAD BASED PAINT	Lead-based Paint Strategy
NORTH IDAHO AIDS COALITION	HIV/AIDS	Non-Homeless Special Needs

Table 2 – Agencies, groups, organizations who participated

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

The City of Coeur d'Alene reached out to 122 agency types within the local jurisdiction (Stakeholder list attached), the region and the State of Idaho. It is unknown if there were any other agencies not consulted.

Other Local/Regional/State/Federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	St. Vincent de Paul	There are no other plans.

Table 3 – Other Local/Regional/Federal planning efforts

Describe the means of cooperation and coordination among the State and any units of general local government in the metropolitan area in the implementation of its Consolidated Plan (91.220(l))

The City contacted several Government agencies through email notifications of public meetings, flyers, and on-line survey address regional issues. These agencies included Idaho Department of Commerce, Idaho Department of Labor, Kootenai County, City of Hayden, and the City of Post Falls. They may have completed the on-line survey; however there was no additional participation or comments received from these Government agencies. The Citizen Survey, public comments received to date, public notices and presentations are made part of this Consolidated Plan as Attachment 2.

Discussion

There is a text box available in IDIS for Table 2 under each Agency/Group/Organization to describe how each was consulted; however, this does not convert to Word. Each Agency, Group, and Organization were initially contacted through email notification and public forum flyer for consultation and coordination, and also encouraged to complete the on-line survey. Several organizations were consulted more in depth for information regarding specific information on homeless, non-homeless special needs, economic development, and housing problems. Anticipated outcomes include solidifying existing partnerships for increasing affordable housing stock, filling gaps with homeless and special needs populations, improving existing housing stock with common housing problems through the Emergency Minor Home Repair and Accessibility Program, and gain additional partnerships in workforce development in the areas of job training and LMI Entrepreneurs.

PR-15 Citizen Participation

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

The Consolidated Plan was developed with a strong emphasis on community input. Flyers explaining the purpose of the Consolidated Plan and how citizens could contribute were posted throughout the City and mailed/emailed to 122 relevant organizations and stakeholders representing community/economic development; community members/business; education; financial institutions; City/County government; State/Federal government; Service Providers; housing agencies; disability advocates; and real estate development. This information was also placed on the City's web page.

The Region I Homeless Coalition (also known as the Continuum of Care Committee) met on May 15 and July 19, 2012. At each meeting City Staff verbally shared with the group the Consolidated Plan process, public forum dates, and the link to the community survey through Survey Monkey.

The City followed its Citizen Participation Plan to place notices in the Coeur d'Alene Press and Nickel's Worth, two papers of general circulation. The notices appeared 7 days prior to each public forum for input on goals and strategies. The notices also provided information on additional ways for citizens to participate in the process. The public forums included a presentation on existing goals and strategies, followed by a hands-on working session to obtain public input. The general consensus of the participants included retaining the goals from the 2008-2012 Consolidation Plan plus including an additional goal to include public service. The Citizen Survey results and all public comments received are included as Attachment 2.

Citizen Participation Outreach

Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
Newspaper Ad	Non-targeted/broad community	Two community members attended the public forum on June 13, 2012 in response to the newspaper advertisement.	N/A	N/A	
Public Meeting	Non-targeted/broad community	Two public forums were held. A total of eleven people attended. Nine represented various Continuum of Care agencies and Two from the General public.	The public agreed with the goals and requested a new goal is added for Public Service/Continuum of Care type projects. Discussion included transitional housing, ADA barriers, and lack of	Two comments were not accepted related to increasing public transportation and to supply medications for substance abuse. The	

Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
			housing stock for very low income.	group agreed that transportation would be incredibly difficult to meet one of the three HUD National Objectives. Providing medications is not an eligible activity under the CDBG program.	
Other	Non-targeted/ broad community	52 community members completed an online survey through Survey Monkey. Results Attached.	Comments included housing counseling, housing education, detoxification facility, low interest loans for LMI entrepreneurs, dental program for those without insurance, major life transitions, and more programs for seniors and disabled. Two comments stated the City should not be accepting Federal funds. Two comments were highly complimentary of the program.	One person requested a dental assistance program for the low income. This was not accepted as it does not fit within HUD's National Objectives.	www.cdaid.org
Public Meeting	Non-targeted/ broad based community	A workshop was held with City Council on September 12, 2012. The meeting was open to the public.	General comments were received on how HUD determines LMI in a community; the City's 10-year Plan to End Homelessness; and the overview of projects over the	All comments were accepted.	

Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
			past five years.		
Public Hearing	Non-targeted/ broad based community	The first Public Hearing was held during a regularly-scheduled City Council Meeting on December 18, 2012, 6:00 PM	No public comments received	N/A	
Public Comment Period	Non-targeted/ broad based community	Public Comment Period January 2, 2013 – February 2, 2013	One comment received supporting the program as a whole, but not supporting the use of tax credits being granted to individuals who build low income housing		
Public Hearing	Non-targeted/ broad based community	The second Public Hearing was held during a regularly-scheduled City Council Meeting on January 15, 2013, 6:00 PM	No public comments received	N/A	

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

This section presents a housing needs profile for the City of Coeur d'Alene, as required by the Consolidated Plan Final Rule, 24 CFR Part 91, Sections 91.205 and 91.210 (January 5, 1995). The needs analysis covers the requirements of:

- summary of housing problems and needs;
- disproportionate need for housing problems, severe housing problems, and cost burdens;
- public housing;
- homeless needs;
- non-homeless special needs; and
- non-housing community development needs.

In order to estimate the type and number of persons in need of housing assistance, it is important to note HUD's definition of the following terms:

- **Cost Burden:** A household that pays more than 30% of gross income for housing and utilities.
- **Severely Cost Burden:** A household that pays more than 50% of gross income for housing and utilities.
- **Housing Problem:** A household that pays more than 30% of income for housing and/or lives in an overcrowded housing unit, and/or lives in a housing unit with incomplete kitchen or plumbing facilities.
- **Substandard Housing Condition:** A deteriorated or dilapidated housing unit that lacks complete plumbing; complete kitchen facilities; public or well water systems, and heating fuel.
- **Substandard Condition but Suitable for Rehabilitation:** A substandard unit that is both economically and structurally viable.
- **Overcrowding:** The number of renter-occupied housing units with an occupancy ratio of 1.01 or more persons per room; (24 CFR 791.402(b))

Cost burden greater than 30% and greater than 50% is the largest housing problem in Coeur d'Alene, solidifying the need of additional affordable housing stock in the City. According to the ACS, the 2009 median value of housing was \$207,000, while the median income was only \$38,410. The Coeur d'Alene Association of Realtors reports on their website that the current average price of a home is \$215,000. The U.S. Census Bureau 2009-2011 ACS states that the median household income for Coeur d'Alene is \$39,878, and the current HUD FY 2012 Income Limits Documentation System identifies the Median Income for Kootenai County at \$58,100. In either scenario, the cost of housing is greater than the ability for an average household's ability to purchase.

The estimated five-year housing needs include affordable housing for the LMI, elderly and non-homeless special needs populations; and additional transitional housing and emergency shelter facilities. These needs were determined based on feedback from the public forums; consultation with St. Vincent de Paul, Disability Action Center, and IHFA; and HUD data tables included in this Plan.

NA-10 Housing Needs Assessment

Summary of Housing Needs

The following tables provided by HUD identify the number and types of families in need of housing assistance by income levels, tenure and household type, and by housing problem. In summary, 45% of the households are considered LMI households (80% and below the HUD Area Median Family Income (HAMFI)).

Demographics	Based Year: 2000	Most Recent Year: 2009	% Change
Population	34,623	41,898	21%
Households	14,929	17,245	16%
Median Income	\$33,001.00	\$38,410.00	16%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2005-2009 ACS Data

Number of Households Table

	0-30% HAMFI	>30- 50% HAMFI	>50- 80% HAMFI	>80- 100% HAMFI	>100% HAMFI
Total Households	1,830	2,390	3,575	2,480	6,970
Small Family Households	545	850	1,115	4,800	0
Large Family Households	75	60	250	695	0
Household contains at least one person 62-74 years of age	245	425	500	365	1,035
Household contains at least one person age 75 or older	290	455	500	235	470
Households with one or more children 6 years old or younger	200	569	550	1,580	0
* the highest income category for these family types is >80% HAMFI					

Table 6 - Total Households Table

Alternate Data Source Name:

Number of Households Table

Data Source Comments:

Housing Needs Summary Tables for several types of Housing Problems

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Substandard Housing - Lacking complete plumbing or kitchen facilities	50	30	0	10	90	25	0	0	0	25
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	35	20	0	0	55	0	0	0	0	0
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	20	10	95	0	125	25	0	0	50	75
Housing cost burden greater than 50% of income (and none of the above problems)	830	575	60	0	1,465	360	310	360	90	1,120
Housing cost burden greater than 30% of income (and none of the above problems)	210	570	875	130	1,785	45	275	695	620	1,635
Zero/negative Income (and none of the above problems)	30	0	0	0	30	30	0	0	0	30

Table 7 – Housing Problems Table

Data

Source: 2005-2009 CHAS

2. Housing Problems

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having 1 or more of four housing problems	935	640	155	10	1,740	410	310	360	140	1,220
Having none of four housing problems	305	765	1,785	860	3,715	115	675	1,275	1,470	3,535
Household has negative income, but none of the other housing problems	30	0	0	0	30	30	0	0	0	30

Table 8 – Housing Problems 2

Data

Source: 2005-2009 CHAS

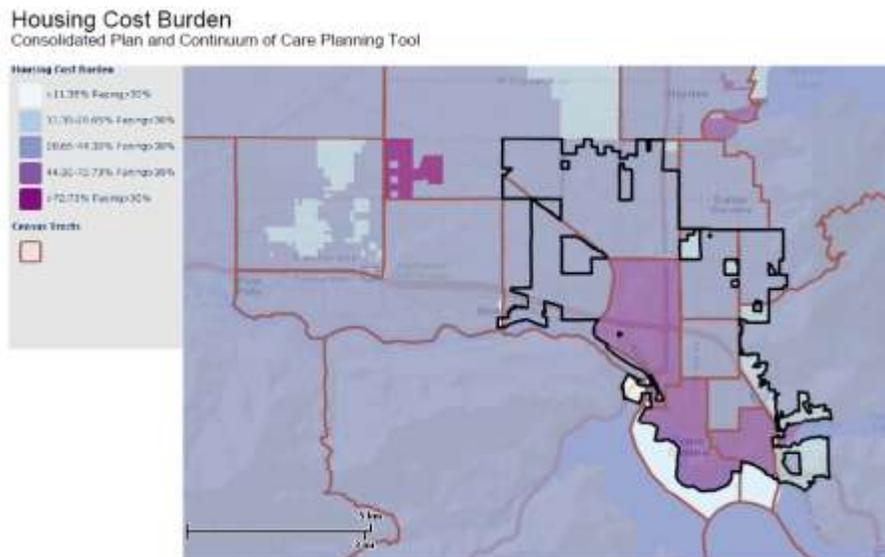
3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	335	515	280	1,130	145	175	445	765
Large Related	60	35	30	125	0	10	120	130
Elderly	225	205	180	610	170	300	250	720
Other	495	420	480	1,395	125	105	240	470
Total need by income	1,115	1,175	970	3,260	440	590	1,055	2,085

Table 9 – Cost Burden > 30%

Data

Source: 2005-2009 CHAS



4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	215	265	0	480	145	110	190	445
Large Related	60	0	0	60	0	10	50	60
Elderly	175	135	20	330	125	125	65	315
Other	455	190	45	690	125	70	55	250
Total need by income	905	590	65	1,560	395	315	360	1,070

Table 10 – Cost Burden > 50%

Data Source: 2005-2009 CHAS

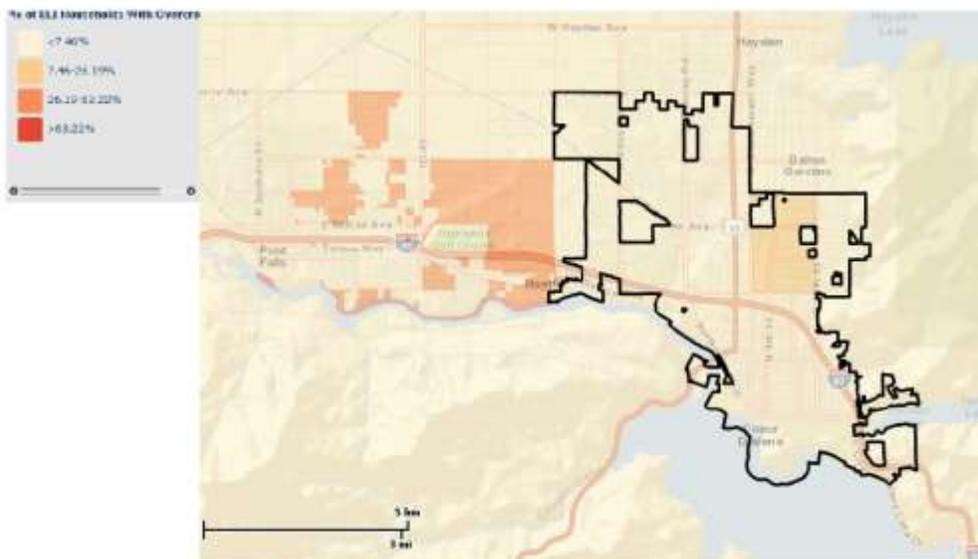
5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Single family households	24	30	85	0	139	25	0	0	0	25
Multiple, unrelated family households	0	0	10	0	10	0	0	0	0	0
Other, non-family households	30	0	0	0	30	0	0	0	0	0
Total need by income	54	30	95	0	179	25	0	0	0	25

Table 11 – Crowding Information

Data Source: 2005-2009 CHAS

Extremely Low Income Households with Overcrowding
Consolidated Plan and Continuum of Care Planning Tool



What are the most common housing problems?

The largest challenge facing individuals and families with children are cost burdens exceeding 30% and 50% of HAMFI. The tables above identify that over 70% of very low and low-income renters and nearly 50% of owners have a cost burden greater than 30%. Further, nearly 95% of renters and 66% of homeowners are severely cost burdened (rent or mortgage payment is greater than 50% of income). Characteristics of individuals and families with children who enter the homeless assistance system need sustainable employment to reduce housing cost burden.

Are any populations/household types more affected than others by these problems?

Household types typically affected by these problems are individuals and families with children that are either unemployed or not earning a living wage.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Low-income individuals and families with children who are at imminent risk of residing in shelters or becoming unsheltered include the lack of sustainable employment, lack of the availability of public transportation, and the lack of quality lower-rent housing stock. Both IHFA and St. Vincent de Paul report that the HPRP program for rapid re-housing ended in August 2012, and currently there are no families receiving the assistance. Prior to termination of the HPRP program, 209 individuals were served by St. Vincent de Paul.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

Not Applicable. The City of Coeur d'Alene does not estimate at-risk populations.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

Instability and an increased risk of homelessness in Coeur d'Alene are characterized by the lack of employment, and mental or physical disabilities.

Discussion

Affordable housing continues to be a priority need in the City, and therefore, the goals to increase for sale affordable housing and increase affordable rental housing continue to be included in this Plan.

Specific data is not available for the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking. A Housing

Inventory Chart obtained from IHFA identifies unmet needs in Region I, covering a 5-County area. The data categorizes needs in three areas: Emergency Shelter, Transitional Housing, and Permanent Supportive Housing.

For purposes of reporting the data, a bed is a literal bed—single, bunk, full, queen or king. A unit on the other hand can be a congregate facility such as a house, apartment, rooms within a house, etc. Under the Emergency Shelter Category, there is a need for 55 Beds for Households without Children; and under Transitional Housing there is a need for 30 Beds for Households without Children. Permanent Supportive Housing has a need for 78 Beds for Households with at Least One Adult and One Child, 14 Units for Households with at Least One Adult and One Child, and 114 Beds for Households without Children. This adds up to a need of 277 beds and 14 units within the five-County Region of North Idaho.

NA-15 Disproportionately Greater Need: Housing Problems

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

HUD defines "disproportionately greater need" when the percentage of persons in a specific racial or ethnic group is at least 10 percentage points higher than the persons in the category as a whole. In each Area Median Income category tables using 2005-2009 data below under "Has one or more of four housing problems", percentage points for Black/African American, American Indian/Alaska Native, and Hispanic range between 1%-3% of the total count; while White ranges between 94% and 97% of the total count.

Comparing the housing problems with the population by race identifies that there is a correlation between the two. The 2012 Population by Race data (U.S. Census Bureau, American FactFinder, Coeur d'Alene Idaho, Table DP-1) identifies that White persons comprise 93.8% of Coeur d'Alene's population, followed by Hispanic (3.7%), American Indian/Alaskan Native (1.2%), Asian (0.8%), Black/African American (0.4%), and Native Hawaiian, and Other Pacific Islander (0.1%).

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,600	165	60
White	1,515	140	60
Black / African American	0	0	0
Asian	0	0	0
American Indian, Alaska Native	20	0	0
Pacific Islander	0	0	0
Hispanic	20	0	0

Table 12 - Disproportionally Greater Need 0 - 30% AMI

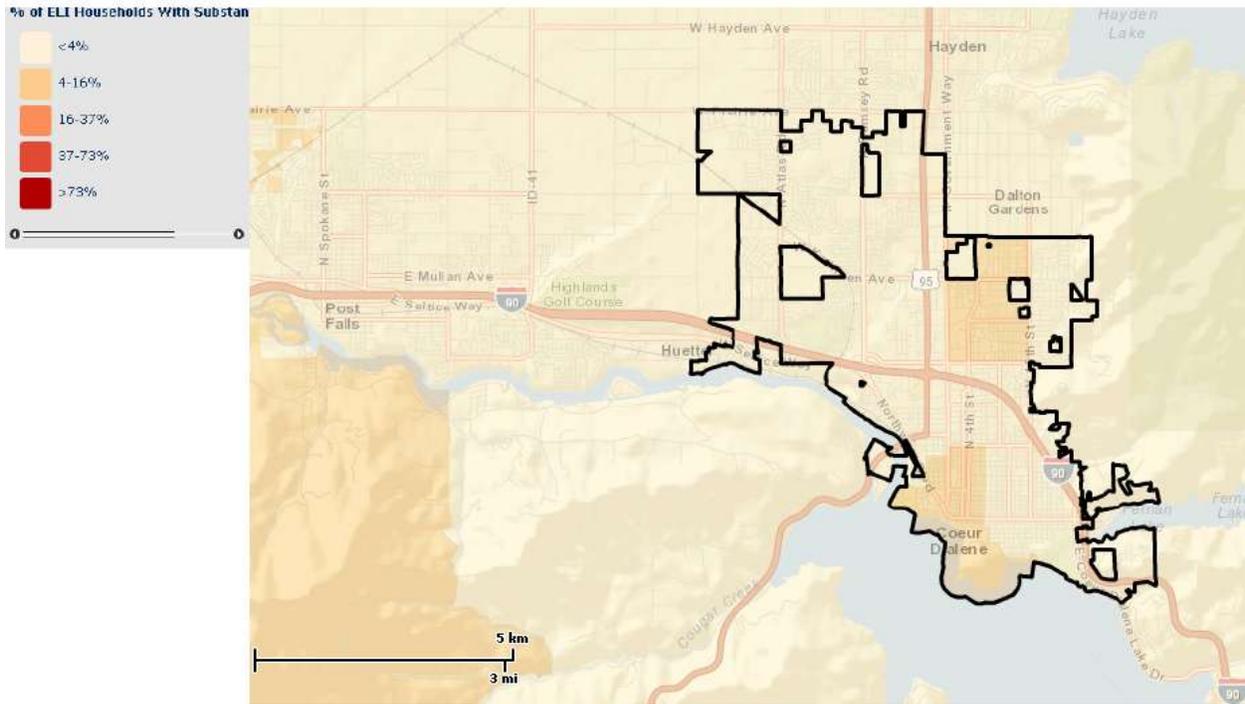
Data Source: 2005-2009 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

Extremely Low Income Households With Substandard Conditions

Consolidated Plan and Continuum of Care Planning Tool



30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,800	590	0
White	1,585	535	0
Black / African American	80	0	0
Asian	0	0	0
American Indian, Alaska Native	0	10	0
Pacific Islander	0	0	0
Hispanic	65	0	0

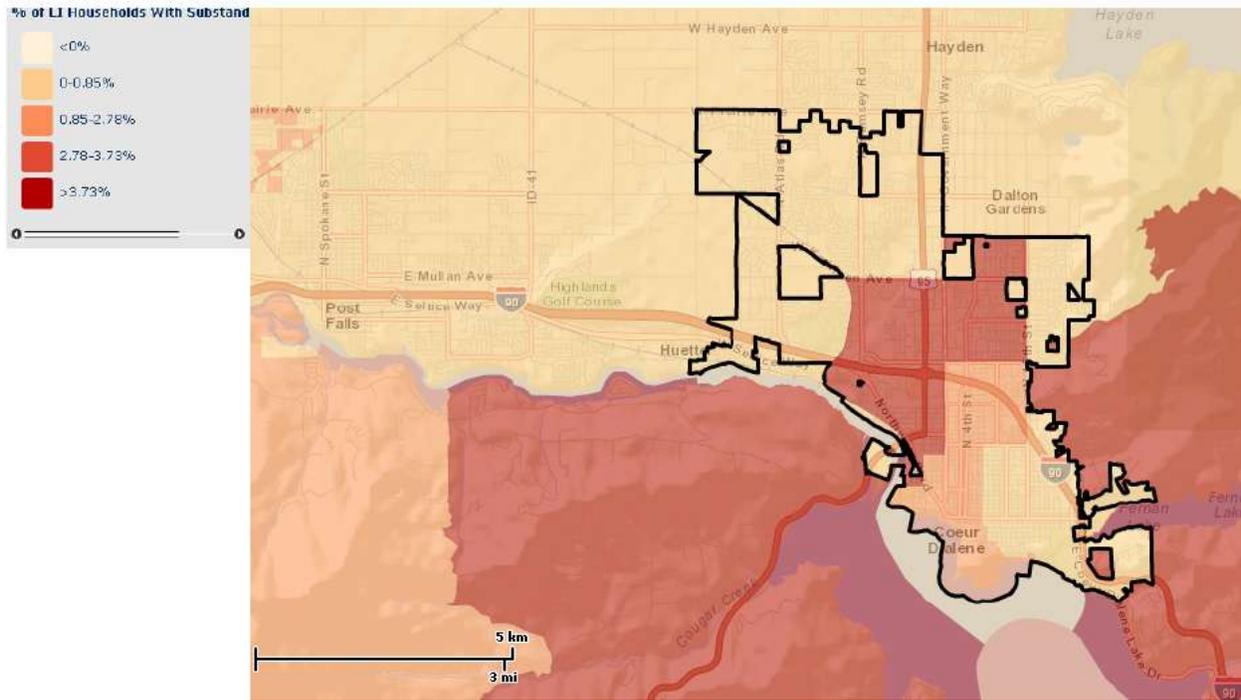
Table 13 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2005-2009 CHAS

*The four housing problems are:
 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Low Income Households With Substandard Conditions

Consolidated Plan and Continuum of Care Planning Tool



50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,085	1,490	0
White	2,030	1,320	0
Black / African American	0	0	0
Asian	0	0	0
American Indian, Alaska Native	0	20	0
Pacific Islander	0	0	0
Hispanic	54	75	0

Table 14 - Disproportionally Greater Need 50 - 80% AMI

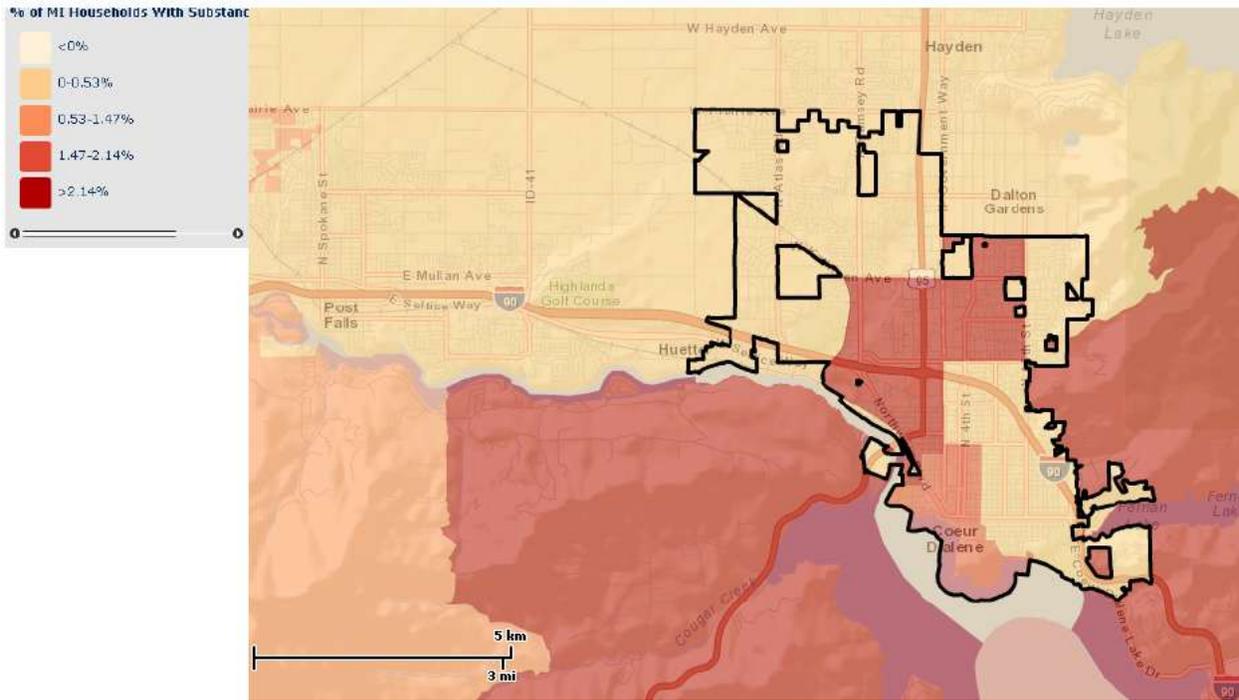
Data Source: 2005-2009 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

Moderate Income Households With Substandard Conditions

Consolidated Plan and Continuum of Care Planning Tool



80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	905	1,580	0
White	865	1,500	0
Black / African American	0	0	0
Asian	0	10	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	35	45	0

Table 15 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2005-2009 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

Discussion

According to the 2005-2009 Comprehensive Housing Affordability Strategy (CHAS) data above, in the City of Coeur d'Alene, the following groups have a disproportionate need:

- White, 0%-30% of Area Median Income
- White, 30-50% of Area Median Income
- White, 50-80% of Area Median Income
- White, 80-100% of Area Median Income

NA-20 Disproportionately Greater Need: Severe Housing Problems

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

As with the previous section with Housing Problems, HUD defines "disproportionately greater need" when the percentage of persons in a specific racial or ethnic group is at least 10 percentage points higher than the persons in the category as a whole. In each Area Median Income category tables using 2005-2009 data below under "Has one or more of four housing problems," percentage points for Black/African American, American Indian/Alaska Native, and Hispanic range between 0%-7% of the total count; while White ranges between 87% and 100% of the total count.

Comparing the housing problems with the population by race identifies that there is a correlation between the two. The 2012 Population by Race data (U.S. Census Bureau, American FactFinder, Coeur d'Alene Idaho, Table DP-1) identifies that White persons comprise 93.8% of Coeur d'Alene's population, followed by Hispanic (3.7%), American Indian/Alaskan Native (1.2%), Asian (0.8%), Black/African American (0.4%), and Native Hawaiian, and Other Pacific Islander (0.1%).

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,345	420	60
White	1,275	380	60
Black / African American	0	0	0
Asian	0	0	0
American Indian, Alaska Native	4	15	0
Pacific Islander	0	0	0
Hispanic	20	0	0

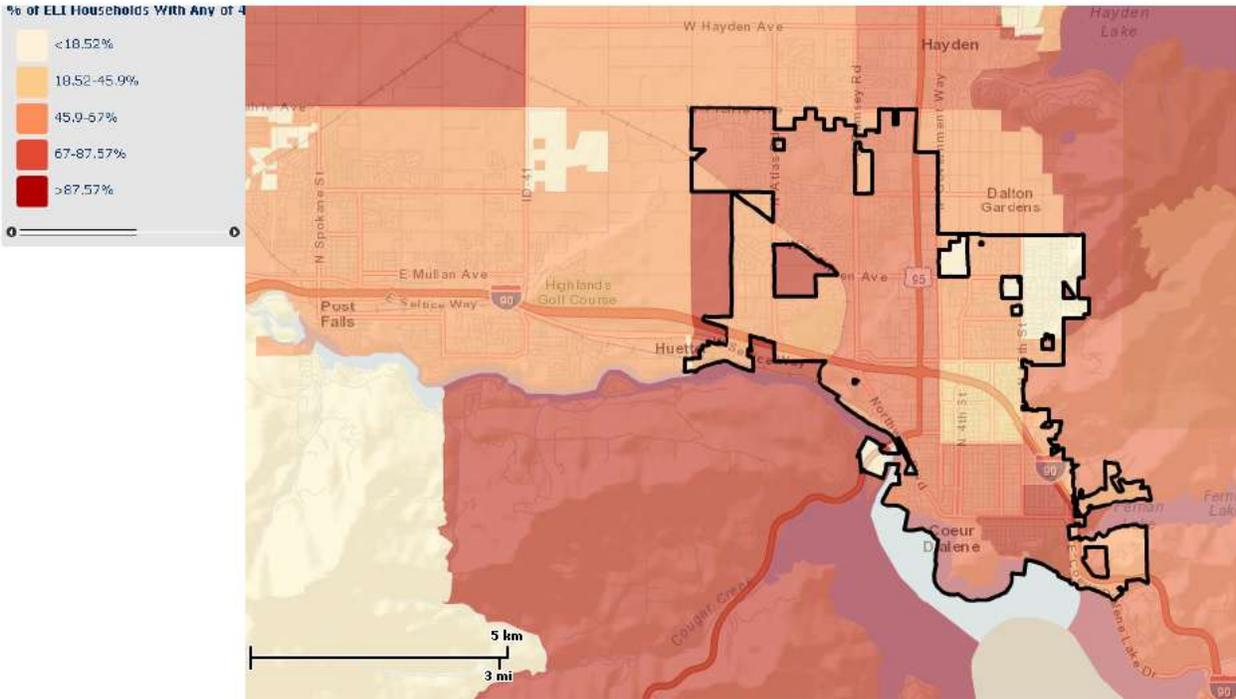
Table 16 – Severe Housing Problems 0 - 30% AMI

Data Source: 2005-2009 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

Extremely Low Income Households With Severe Housing Problems
 Consolidated Plan and Continuum of Care Planning Tool



30%-50% of Area Median Income

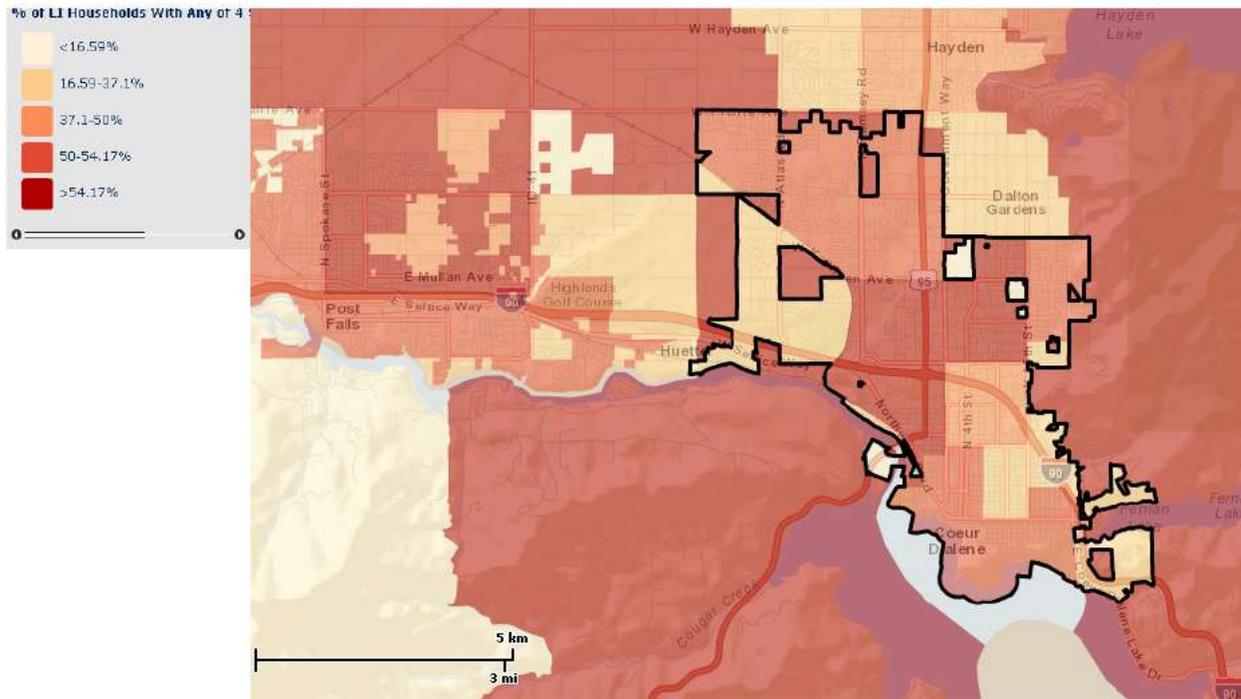
Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	950	1,440	0
White	835	1,285	0
Black / African American	65	15	0
Asian	0	0	0
American Indian, Alaska Native	0	10	0
Pacific Islander	0	0	0
Hispanic	10	55	0

Table 17 – Severe Housing Problems 30 - 50% AMI

Data Source: 2005-2009 CHAS

*The four severe housing problems are:
 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room,
 4. Cost Burden over 50%

Low Income Households With Severe Housing Problems Consolidated Plan and Continuum of Care Planning Tool



50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	515	3,060	0
White	505	2,840	0
Black / African American	0	0	0
Asian	0	0	0
American Indian, Alaska Native	0	20	0
Pacific Islander	0	0	0
Hispanic	10	130	0

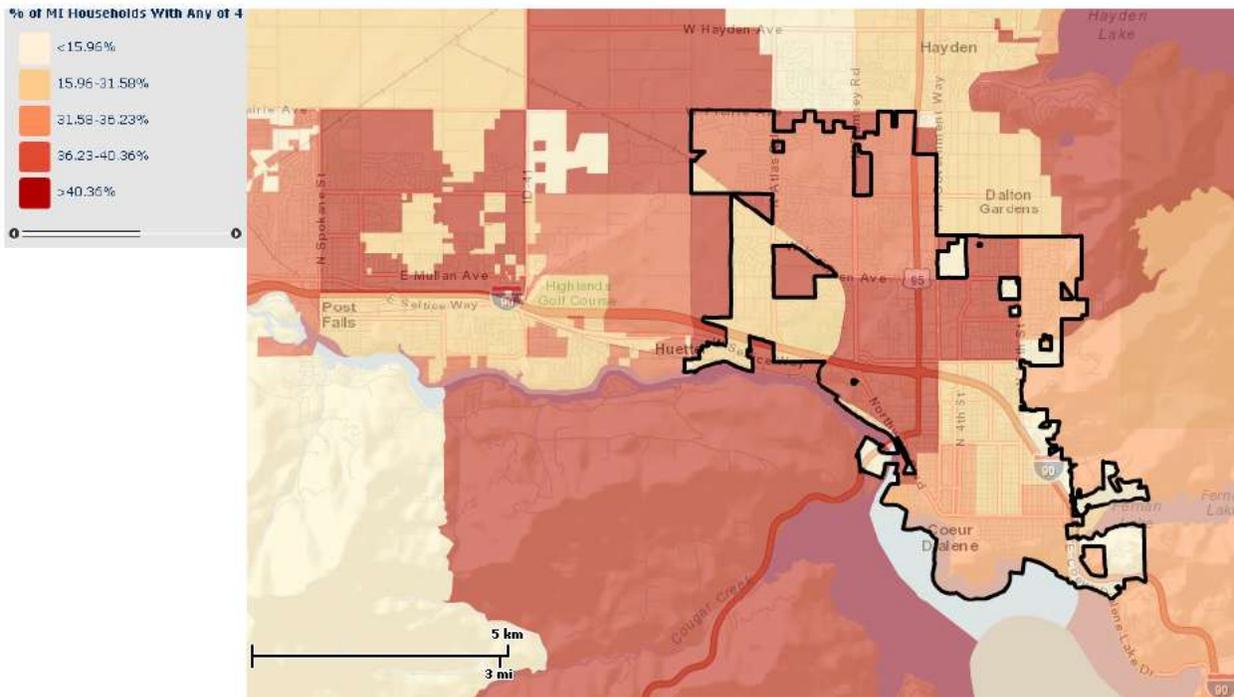
Table 18 – Severe Housing Problems 50 - 80% AMI

Data Source: 2005-2009 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

Moderate Income Households With Severe Housing Problems Consolidated Plan and Continuum of Care Planning Tool



80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	150	2,330	0
White	150	2,215	0
Black / African American	0	0	0
Asian	0	10	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	0	80	0

Table 19 – Severe Housing Problems 80 - 100% AMI

Data Source: 2005-2009 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

Discussion

According to the 2005-2009 Comprehensive Housing Affordability Strategy (CHAS) data above, in the City of Coeur d'Alene, the following groups have a disproportionate need:

- White, 0%-30% of Area Median Income
- White, 30-50% of Area Median Income
- White, 50-80% of Area Median Income
- White, 80-100% of Area Median Income

NA-25 Disproportionately Greater Need: Housing Cost Burdens

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

As with the previous section with Housing Problems, HUD defines "disproportionately greater need" when the percentage of persons in a specific racial or ethnic group is at least 10 percentage points higher than the persons in the category as a whole. In each income category below for housing cost burden, percentage points for Black/African American, Asian, American Indian/Alaska Native, and Hispanic range between 0.1% and 4% of the total count; while White ranges between 96% and 97% of the total count.

Comparing the housing problems with the population by race identifies that there is a correlation between the two. The 2012 Population by Race data (U.S. Census Bureau, American FactFinder, Coeur d'Alene Idaho, Table DP-1) identifies that White persons comprise 93.8% of Coeur d'Alene's population, followed by Hispanic (3.7%), American Indian/Alaskan Native (1.2%), Asian (0.8%), Black/African American (0.4%), and Native Hawaiian, and Other Pacific Islander (0.1%).

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	10,270	4,180	2,730	60
White	9,675	3,915	2,550	60
Black / African American	25	15	65	0
Asian	30	0	0	0
American Indian, Alaska Native	75	30	4	0
Pacific Islander	0	0	0	0
Hispanic	290	175	30	0

Table 20 – Greater Need: Housing Cost Burdens AMI

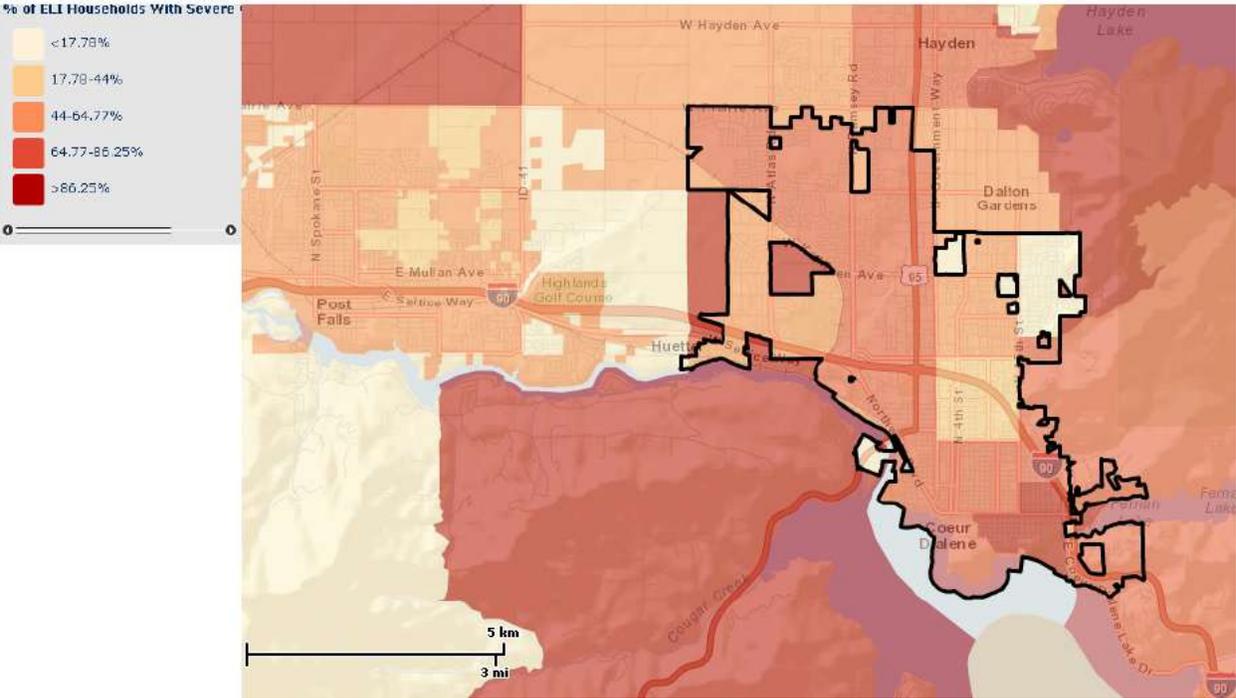
Alternate Data Source Name:

Number of Households Table

Data Source Comments: Total numbers under 'Jurisdiction as a Whole' corrected to reflect actual column totals.

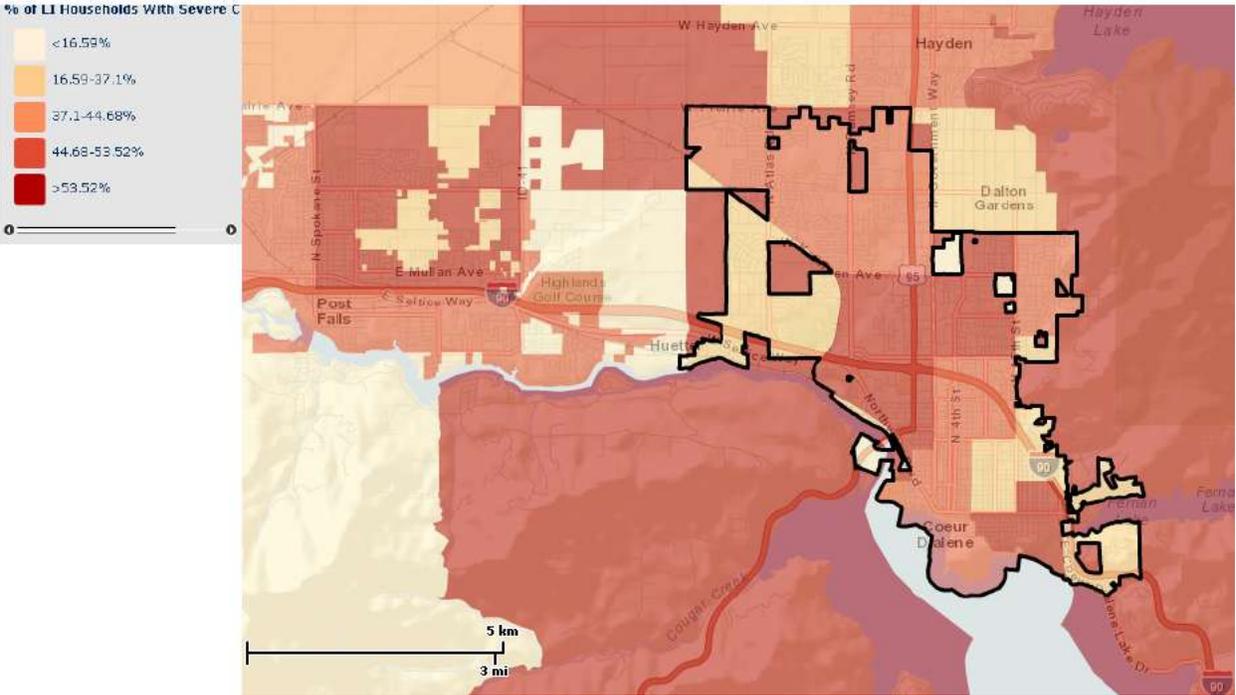
Extremely Low Income Households With Severe Cost Burden

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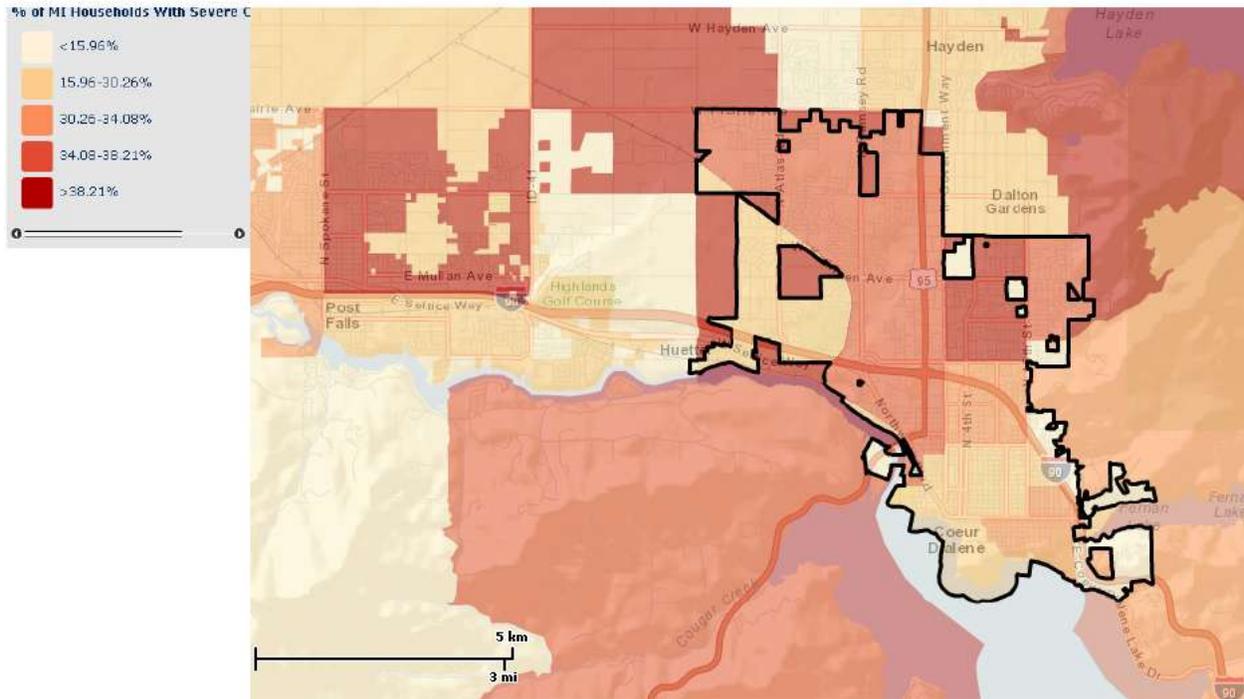
Low Income Households With Severe Cost Burden

Consolidated Plan and Continuum of Care Planning Tool



Moderate Income Households With Severe Cost Burden

Consolidated Plan and Continuum of Care Planning Tool



Discussion

The very low-income category (0-30% HAMFI) bears the brunt of housing cost burdens, followed in order of income levels: low income and then moderate-income. According to the ACS, the median value of occupied owner units in Coeur d'Alene in 2000 was \$105,300. (The "median price" is the point at which half of the units are valued at less than the median and half are valued at more than the median.) The 2009 median value of housing was \$207,000, a 51% increase from 2000.

NA-30 Disproportionately Greater Need: Discussion

Income categories in which a racial or ethnic group has disproportionately greater need

There is not much racial diversity in Coeur d'Alene as only 6.2% of the City's population comprises racial or ethnic groups. Under each of the "Disproportionately Greater Need" sections, the racial/ethnic populations comprise 0-7% of the needs, with both the largest and the smallest percentages in the category of severe housing problems. The Hispanic population, with 465 persons with housing cost burden in the 0-50% HAMFI categories, still only comprises 3% of the total.

The extremely low income as a whole, not a specific racial group, is the largest population affected by housing problems, severe housing problems, and/or cost burden. There is a greater population with cost burden, and as a result, the most likely to enter the homeless assistance program.

Needs not previously identified

Prior to the economic downturn, lenders were providing home loans to individuals and households without concern that the loans were more than one could afford. The stock market plummeted and this population group found themselves unemployed, or employed with substantial decrease in hours and/or pay, making it difficult to afford rents or home mortgages. The extremely low-, low-, and moderate-income populations need stability through employment and affordable housing choice.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

No neighborhoods have been identified in Coeur d'Alene where a racial or ethnic group has disproportionately greater needs.

NA-35 Public Housing

Introduction

The City is not, and does not have a local public housing authority. IHFA administers the Section 8 program in Coeur d'Alene. The 2011 Analysis of Impediments to Fair Housing Choice (Attachment 3) prepared by BBC states that affordable housing programs available to Coeur d'Alene residents include the Low Income Housing Tax Credit (LIHTC) program; the HOME program; the Project-Based Section 8 program; and the Section 8 Housing Choice Voucher program. The Low-Income Housing Development Table below identifies 12 low-income housing tax credit and HOME developments in Coeur d'Alene. These developments had 554 family units, 146 units for seniors, and 108 accessible to persons with disabilities.

The HUD data table titled "Totals in Use" below identifies 75 public housing units. Consultation with IHFA identified there are 76 public housing units in the entire State of Idaho, with 47 units in neighboring Shoshone County and the remaining in the City of Idaho Falls (Southeastern Idaho). As such, the subsequent HUD data table in this section titled "Characteristics of Residents" is information for the public housing units in Shoshone County and in the City of Idaho Falls. There are no public housing units in Coeur d'Alene.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	75	0	0	0	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 21 - Public Housing by Program Type

Data Source: PIC (PIH Information Center)

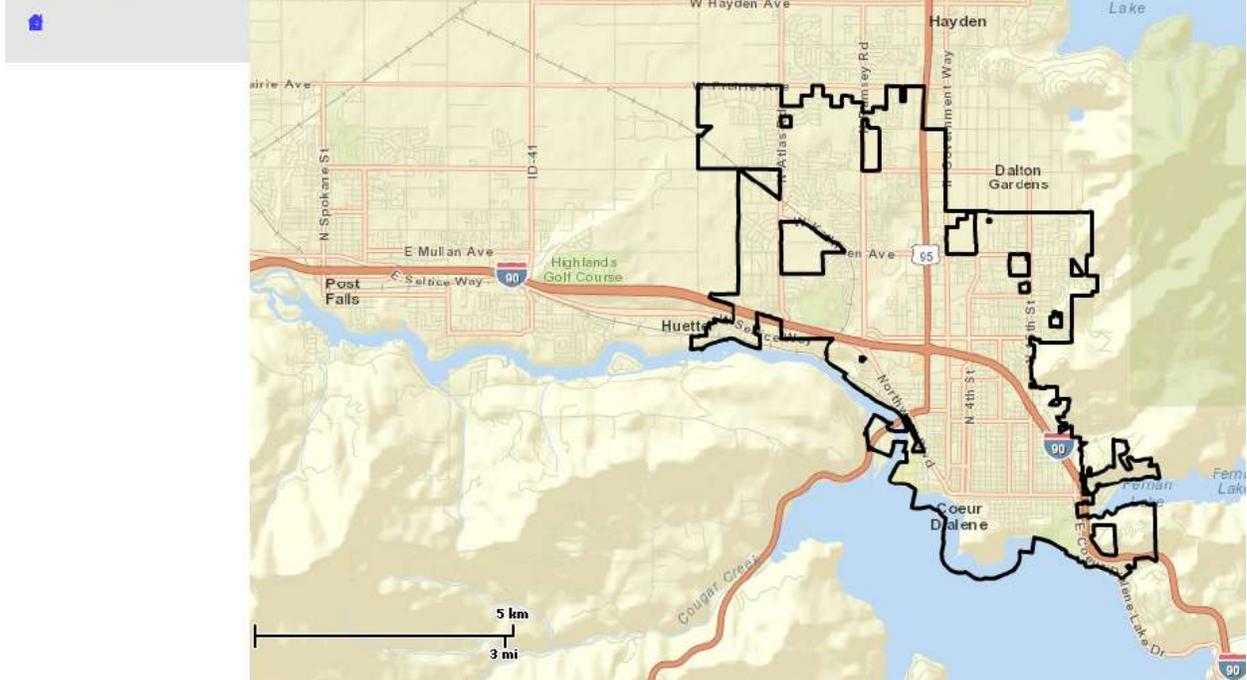
Low-Income Housing Tax Credit/HOME Developments in Coeur d'Alene, as of January 2011

Facility Name	Address	Units by Type			Unit Size (by no. of bedrooms)				Rent Range		
		Family	Elderly	Accessible	0	1	2	3	4	Low	High
Cherry Ridge	1053 Emma Ave.	61		11	X	X				VARIES	
Coeur d'Alene Senior Housing	7712 N. Heartland Dr.		37	37	X	X				\$ 215	\$ 560
Fairwood Apts	1905 W. Appleway	120		2	X	X				\$ 495	\$ 591
Falls Creek Apartments	2831 N. Julia Street	170			X	X	X			\$ 228	\$ 702
Heartland Senior Housing	7745 N. Heartland Dr.		23	29	X	X				VARIES	
Homestead Apartments	106 E. Homestead	7	6	2	X	X				\$ 475	\$ 550
Kathleen Córers	3350 Kathy Loop	30			X	X	X			\$ 277	\$ 690
Lakewood Ranch	3755 4th Street		80	4	X	X				VARIES	
Maple Grove Apartments	3157 Fruitland	23		1	X	X				\$ 475	\$ 520
Park Place Apartments	3825 Ramsey	30		16	X	X	X			VARIES	
Silver Lake Apartments I	698 W. Wilbur	60		3	X	X	X			\$ 223	\$ 605
Silver Lake Apartments II	689 W. Wilbur	53		3	X	X	X			\$ 373	\$ 605

Source: Northern Panhandle Idaho Assisted Housing Directory, Idaho Housing and Finance Association.

Public Housing Developments (None in Coeur d'Alene)
 Consolidated Plan and Continuum of Care Planning Tool

Public Housing Developments



Characteristics of Residents

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Average Annual Income	0	0	14,873	0	0	0	0	0	0
Average length of stay	0	0	3	0	0	0	0	0	0
Average Household size	0	0	2	0	0	0	0	0	0
# Homeless at admission	0	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	16	0	0	0	0	0	0
# of Disabled Families	0	0	36	0	0	0	0	0	0
# of Families requesting accessibility features	0	0	75	0	0	0	0	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 22 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Special Purpose Voucher					
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	73	0	0	0	0	0	0
Black/African American	0	0	1	0	0	0	0	0	0
Asian	0	0	1	0	0	0	0	0	0
American Indian/Alaska Native	0	0	0	0	0	0	0	0	0
Pacific Islander	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 23 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Special Purpose Voucher					
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	6	0	0	0	0	0	0
Not Hispanic	0	0	69	0	0	0	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 24 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment

Needs of public housing tenants and applicants on the waiting list for accessible units

There is no public housing in Coeur d'Alene. This information is not obtained for Section 8 vouchers as participating families in this program seek their own rental units.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

As of 8/30/2012, the IHFA has 1,458 applications on their waiting list for Section 8 tenant-based rental assistance. Of the total, 812 are elderly and/or disabled families. The remaining are families with children and single people without a preference. The immediate needs of this population are stable, affordable, safe and decent housing.

How do these needs compare to the housing needs of the population at large

Typically housing needs for the general population are no different than those stated above, and include stable, affordable, safe and decent housing—all critical components.

NA-40 Homeless Needs Assessment

Introduction

Idaho's two Continuums of Care (CoC) conducted a Point-in-Time (PIT) count as reported in the *"State of Idaho January 2012 Region One Point-in-Time Count Report"*. For the PIT count, CoCs are instructed to count all adults, children in households, and unaccompanied youth who, on the night of the count, resides in one of the places described below:

- An unsheltered homeless person resides in a place not meant for human habitation. Included in this count are people in temporary tents or armory shelters, encampments, and warming centers.
- A sheltered homeless person resides in an emergency shelter, transitional housing or supportive housing for homeless persons who originally came for the streets or emergency shelters.

The PIT count consists of two methods to collect data. The sheltered homeless data is collected from surveys filled out by the shelters and from the Idaho HMIS database. The unsheltered homeless survey is administered by "street or known locations" and "service based" counts conducted in each region in the State and entered into HMIS. Note that the data in the table below is for the *entire* Region I of Idaho, which includes Benewah, Bonner, Boundary, Kootenai, and Shoshone Counties. The data is not broken down by County or Municipality. Further, the data does not include "Precariously Housed" individuals and households in the main count results. "Precariously Housed" is characterized as being at imminent risk of becoming homeless--these persons may be staying with friends or relatives, in a hotel/motel, in a treatment facility or in jail.

The Homeless Needs Assessment Table below identifies the number of sheltered and unsheltered homeless on a given night. Data is unavailable for for the categories of number experiencing homeless each year, number becoming homeless each year, number exiting homelessness each year, and number of days persons experience homelessness. The "PIT Sheltered and Unsheltered" chart below the Table provides the PIT counts for years 2007 through 2012. The January count identified 427 sheltered and unsheltered homeless households, a significant decrease from the PIT count in 2011 (559). Sheltered Homeless is down considerably from 2011, yet Sheltered Homeless increased by 3 from 174 in 2011 to 177 in 2012.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	118	24	0	0	0	0

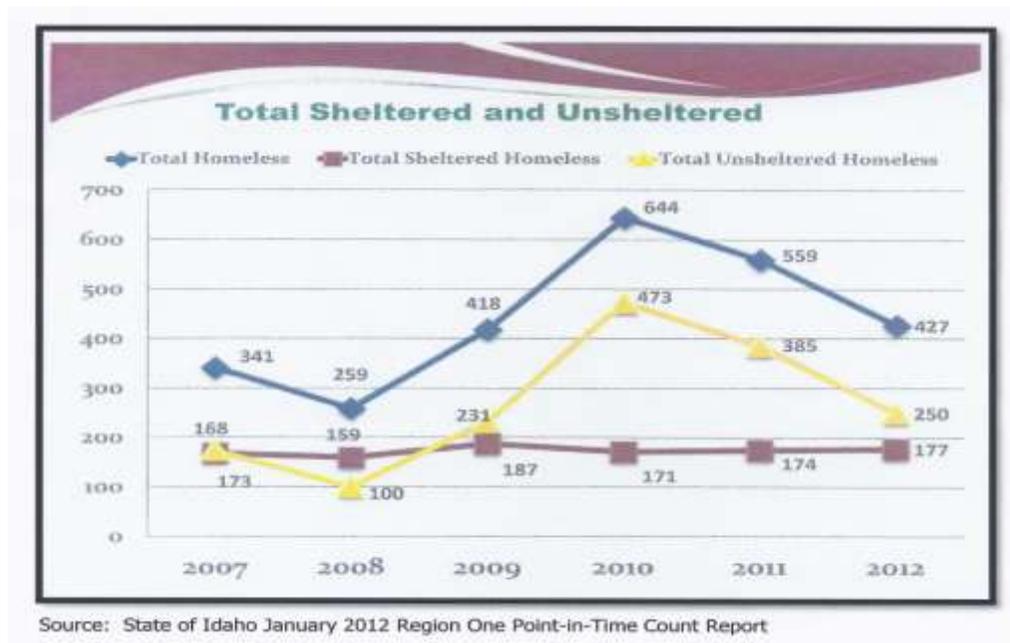
Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Only Children	0	6	0	0	0	0
Persons in Households with Only Adults	59	202	0	0	0	0
Chronically Homeless Individuals	22	71	0	0	0	0
Chronically Homeless Families	1	6	0	0	0	0
Veterans	29	43	0	0	0	0
Unaccompanied Child	0	0	0	0	0	0
Persons with HIV	0	0	0	0	0	0

Table 25 - Homeless Needs Assessment

Data Source

Comments:

State of Idaho January 2012 Region One Point-in-Time Count Report



PIT Sheltered & Unsheltered

Population includes Rural Homeless: Some

Jurisdiction's Rural Homeless Population

St. Vincent de Paul reports that those that are typically entering the homeless assistance system are a result of the lack of employment; being paid low wages with high rents; or victims of drug abuse and domestic violence; and those with disabilities and mental illness. Household types that are more affected than others are typically single parent women and chronically mentally ill men.

For persons in rural areas who are homeless or at risk of homelessness, describe the nature and extent of unsheltered and sheltered homelessness with the jurisdiction

The data provided includes the 5-county region of North Idaho, which is considered rural except for the City of Coeur d'Alene. The extent and nature of those who are homeless or at risk of homeless in the region is not unlike those within the jurisdiction. As shown in the table above, the point in time count identified a total of 427 persons in the region experiencing homelessness on a given night.

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Data is not obtainable specifically for the population categories identified in Table 25, Homeless Needs Assessment. The January 2012 Region One PIT Report for Unsheltered Individuals and Households reports that out of the 197 individuals and households completing the survey, 32% are continuously homeless for one year or more. The extent of homelessness is rounded out by 2-3 times in the past three years (30%); first time homeless (24%); and four or more episodes in the past three years (14%).

The PIT Count reported 221 responses for the Precariously Housed under extent of homelessness. Over 42% of those completing the survey reported homelessness 2-3 times over the past 3 years, with nearly 38% reporting homelessness for the first time; followed by four or more episodes in the past three years (12%) and continuously homeless for one year or more (9%).

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

Based on the "Homeless Needs Assessment" table above, sheltered and unsheltered families with children comprise 25% of the homeless population on a given night. The North Idaho PIT count only provides information on homeless veterans; therefore it is unknown how many homeless families of veterans there are in North Idaho.

Nature and Extent of Homelessness by Racial and Ethnic Group

North Idaho does not have a wide range of diversity in racial and ethnic groups. Of the total identified in Nature and Extent of Homeless table above, the white population comprises 89% of the homeless

population, followed by American Indian or Alaska Native (5%), Hispanic (3%), Black or African American (2%), and Other Race not of Hispanic Origin (1%).

Nature and Extent of Unsheltered and Sheltered Homelessness, including Rural Homelessness

The PIT Count includes the five northern Counties of Idaho. Although as a whole North Idaho is rural, the City of Coeur d'Alene is not considered a rural area. In North Idaho, unemployment is the largest contributor to homeless persons, followed by substance abuse, inability to find affordable housing, bad credit history, evicted/unable to pay rent, and mental disabilities. Of the 427 sheltered and unsheltered homeless individuals and persons in households, the 2012 PIT Count identifies that 30% are homeless (sheltered and unsheltered) as a result of substance abuse, and 21% as a result of a serious mental illness. Communication with St. Vincent de Paul, Region I lead for CoCs, indicates that women with children are the largest population of homeless families. There is an imbalance between fair market rents, jobs and availability of affordable housing.

Discussion

St. Vincent de Paul credits the decrease in homeless to the HPRP program, which ended in August 2012.

NA-45 Non-Homeless Special Needs Assessment

Introduction

This section outlines the characteristics and resources of the non-homeless special needs populations.

Characteristics of Special Needs Populations

Elderly. Senior Citizens comprise nearly 15% of Coeur d'Alene's total population and roughly 11% of all households. This population typically has lower incomes and need for supportive services or structural adaptations.

Persons with Disabilities. According to the 2008-2010 ACS, 11% of Coeur d'Alene's population has a disability—5% with one type of disability and 6% with one or more types of disability.

Severe Mental Illness. A *State Estimates of Adult Mental Illness* report by the National Survey on Drug Use and Health (NSDUH) in May 2012 reports that mental illness is one of the leading causes of disability in the United States. The NSDUH combined 2008 and 2009 National Surveys identified that the severe mental illness average for adults age 18 and over is 4.6%. Idaho ranked 6th nationally, at 5.77%. (Source: <http://www.samhsa.gov/data/>)

Substance Abuse. What may start as an experiment or fluke, many youth start flirting with alcohol or drugs either out of curiosity or because they experience peer pressure. National Drug Control Policy Drug Abuse Statistics for Idaho state that more than 5,036 adults and about 845 juveniles were arrested during 2006-07 in the State of Idaho. Approximately 9% of youth between the ages of 12 and 17 take their first sip of alcohol or smoke their first joint. Common illegal drugs used in Idaho include cocaine, heroin, methamphetamine, marijuana club drugs such as ecstasy, ketamine and LSD, and prescription drugs such as Oxycontin, Hydrocodone and Benzodiazepines. Methamphetamine is becoming the most abused substance in Idaho, and marijuana is the second most abused in the State.

According to a June 2011 news release from the Substance Abuse and Mental Health Services Administration (SAMHSA), mental and substance use disorders often go hand in hand. The news release further reveals that alcohol dependence is four times more likely to occur among adults with mental illness than among adults with no mental illness. A May 2011 SAMHSA report identified that nationally, 13.2% of persons with alcohol dependence also had a serious mental illness.

At-Risk Youth. There are three segments of the youth population in Coeur d'Alene who have potential housing and supportive services needs: Youths aging out of the foster care system; older youth transitioning to adulthood with uncertain future plans; and youth who are homeless.

The Idaho KIDS COUNT Data Center Indicators reports that in 2009 there were 8,103 children ages 0-17 on Food Stamps. The Indicators also identifies 8,091 Medicaid Participants ages 0-17; 36 Teen Births ages 15-17; 14 Child Deaths; 9 Teen Violent Deaths; and 3 Teen Suicide.

Maltreatment of children, i.e., emotional abuse, medical neglect, neglect, physical abuse, sexual abuse, or other, is prevalent in Idaho. The Idaho Child Welfare Summary identifies 1,664 child maltreatment victims in the State of Idaho for 2010. This equates to approximately 1.6 children for every 1,567

residents. Using this rate, approximately 48 children 18 and under experienced maltreatment in Coeur d'Alene during 2010.

Housing and Supportive Service Needs and Determination

There is a myriad of supportive services for the non-homeless special needs populations. For persons unable to live alone, there are 32 assisted living facilities with 720 beds for persons with disabilities and the elderly in Kootenai County. Almost half (49%) of the beds are located in 14 developments in Coeur d'Alene. All of the facilities specifically target the elderly except for Harmony House Assisted Living I and II, which targets persons with severe needs: developmentally disabled, physically disabled, patients with traumatic brain injury and persons with mental illness.

Affordable housing programs available to Coeur d'Alene residents include the LIHTC program; the HOME program; the Project-Based Section 8 program; and the Section 8 Housing Choice Voucher program. Combining the LIHTC, HOME and Project-Based Section 8 programs, there are 869 family units, 461 elderly units, and 175 handicapped accessible units in Coeur d'Alene.

Through the Section 811 program rent is charged based on income. To qualify for assistance, at least one member of a household must be 18 or older with a physical, developmental and/or mental disability. Section 811 projects provide rental assistance to tenants by covering the difference between the HUD-approved operating costs and the tenant's rent contribution (usually 30% of adjusted income). The 811 development connects residents with St. Vincent de Paul programs on an as-needed basis.

Additional resources for the low-income include Habitat for Humanity of North Idaho, providing affordable for sale housing to those in need; United Way of Kootenai County, providing basic needs and crisis intervention to help those in need within Kootenai County; and the Community Action Partnership (CAP) providing services to the low-income households. CAP services include weatherization assistance, home energy assistance, emergency food assistance and telephone service assistance. Additional programs include foreclosure counseling and a Community Service Block Grant that provides a range of services and activities to assist the needs of low-income individuals including the homeless, migrants and the elderly. CAP is aligned with the Idaho Hunger Relief Task Force, Idaho Food Bank, Idaho Interfaith Roundtable Against Hunger, and IHFA.

The Dirne Community Health Center provides medical care on a sliding fee scale based on household income and family size, with emphasis on the LMI and homeless populations. Types of care includes, but is not limited to, individual and family medical, medication assistance, chronic disease management, minor orthopedic injuries and lacerations, preventative care, and immunizations.

TESH provides services for persons with disabilities, including child development, independent living and employment.

The H.E.L.P. Center, operated by St. Vincent de Paul provides office space and basic operating functions in a "one stop shop" so that LMI persons can make inquiries and receive services from employment searches to housing assistance, to basic health care with various organizations represented on site.

The Children's Village also operates the Miller Home that serves children who experience difficulties such as depression, behavioral difficulties, poor social development, and lack of anger management that

impairs the child from functioning on a daily basis. These children receive structured, individualized and behaviorally focused residential treatment. The Miller Home has 11 beds. Children at the Miller Home attend the Children's Village Academy, an accredited school by the State of Idaho and located on-site.

The Idaho Youth Ranch provides troubled children a bridge to a valued, responsible and productive future. The Idaho Drug Free Youth (IDFY) educates youth, families and community members about the risks of using drugs, alcohol and tobacco by promoting and encouraging positive peer and adult influence.

Public Size and Characteristics of Population with HIV / AIDS

The *HIV/AIDS Surveillance Report* as of December 2008 produced by the Center for Disease Control and Prevention (CDC) states that in the State of Idaho there are 342 people living with AIDS, and an additional 402 living with HIV. (Source: www.statehealthfacts.org/profile)

The North Idaho Aids Coalition (NIAC) is a non-profit community based organization that serves as a support group for people with HIV/AIDS, their families, friends and loved ones. NIAC reports that the 2010 Idaho Epidemiologic Profile identifies 666 people living with AIDS, and 459 living with HIV, for a total of 1,125 Idaho residents presumed to be living with HIV/AIDS. For District 1 (five Northern Counties of Idaho), there are 147 people living with HIV/AIDS, which is roughly 7.6 percent of the State total.

Discussion

In most communities, there is no one affordable housing product that addresses the wide range of housing needs. The amount and type of housing assistance lower-income households need to avoid being cost burdened varies depending on their income and household characteristics. For example, persons who have a physical disability may require special adaptations to their homes. Persons with mental illnesses and/or developmental disabilities might need housing with health care services nearby. Families living in poverty usually need large subsidies to help them pay their rent costs.

NA-50 Non-Housing Community Development Needs

Public Facilities

Public facilities needed in Coeur d'Alene include health facilities for substance abuse, and an increase in transitional housing and shelter facilities to further meet the needs of homeless and victims of domestic violence.

Need Determination

Input from consultations and public participation concluded that there is not enough room to serve everyone in the City that is in need of homeless shelters, women's shelters, and transitional housing. It was further strongly expressed that a detoxification facility is greatly needed to serve those with substance abuse.

Public Improvements

The largest public improvement need in the City is sidewalk replacement with accessible intersections. The City Council has adopted a goal of bringing city sidewalks into compliance with the Americans with Disabilities Act (ADA). With the passage of the 2008-2009 budget, the City Council created a new "ADA Sidewalk Hazard abatement Program" that will support systematic sidewalk repairs. Tied to foregone taxes, the ADA Sidewalk Hazard Abatement Program is budgeted at \$200,000 per year, and will produce approximately 5,000 lineal of sidewalk repairs annually, based on a five-year plan.

Need Determination

The City met with citizens representing the disabled population and discussed how to prioritize the sidewalk needs for the next five years, resulting in a five-year Priority Plan for Sidewalk Hazard Abatement. The Plan is updated and approved by the City Council on an annual basis, and guides the City to prioritize repairs first in civic areas, followed by commercial areas, and then residential areas. The first five-year Plan focuses on "catch up" work necessary to make an accessible route to connect the investment already made in the 300+ pedestrian ramps constructed on 3rd Street, 4th Street, Lakeside Avenue, Best Avenue and Harrison Avenue. By completing these areas first, the pedestrian ramp costs already invested will provide a complete and useable ADA route in high traffic and civic corridors with some residential and commercial benefit.

Public Services

There are limited funds in the community for homeless programs and services for seniors, disabled, substance abuse, battered/abused spouses, employment training, crime awareness/prevention, housing counseling and mental health.

Need Determination

Input from consultations with service providers and within the public forums resulted in the recognition that there is a greater need for public services in Coeur d'Alene for all populations, especially in the areas of substance abuse, mental health, crime reduction and awareness, and homebuyer down payment assistance.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The Housing Market Analysis was prepared by BBC Consulting, Inc. (BBC), Denver, Colorado in 2007 and updated in 2011 (by BBC) as part of the Analysis of Impediments to Fair Housing Choice. All information in this section has been extrapolated from the attached 2011 Analysis of Impediments to Fair Housing Choice, Final Report, June 20, 2011 by BBC. Discussion points of the report examine the current housing market as well as overall affordability in the City. It also compares the housing market in 2011 to the market in 2007 when a similar study for the City was completed by BBC. This section includes updating recommendations from the 2007 housing market study.

MA-10 Number of Housing Units

Introduction

The 2005-2009 ACS reported 17,245 housing units in 2009, which is 2,316 more than in 2000. About three-fourths of the City's residential units are detached single-family homes. Nine percent are 2-4 unit complexes and 5% are mobile homes. The remaining 15 percent of units are made up of townhomes and apartments.

According to the ACS, 43% of the City's households rent their current home. With renters comprising nearly half of the City's households, the availability of quality and affordable rental housing is important to attract and retain the City's workforce, students, and persons who simply prefer renting over owning.

All rental properties by number of units

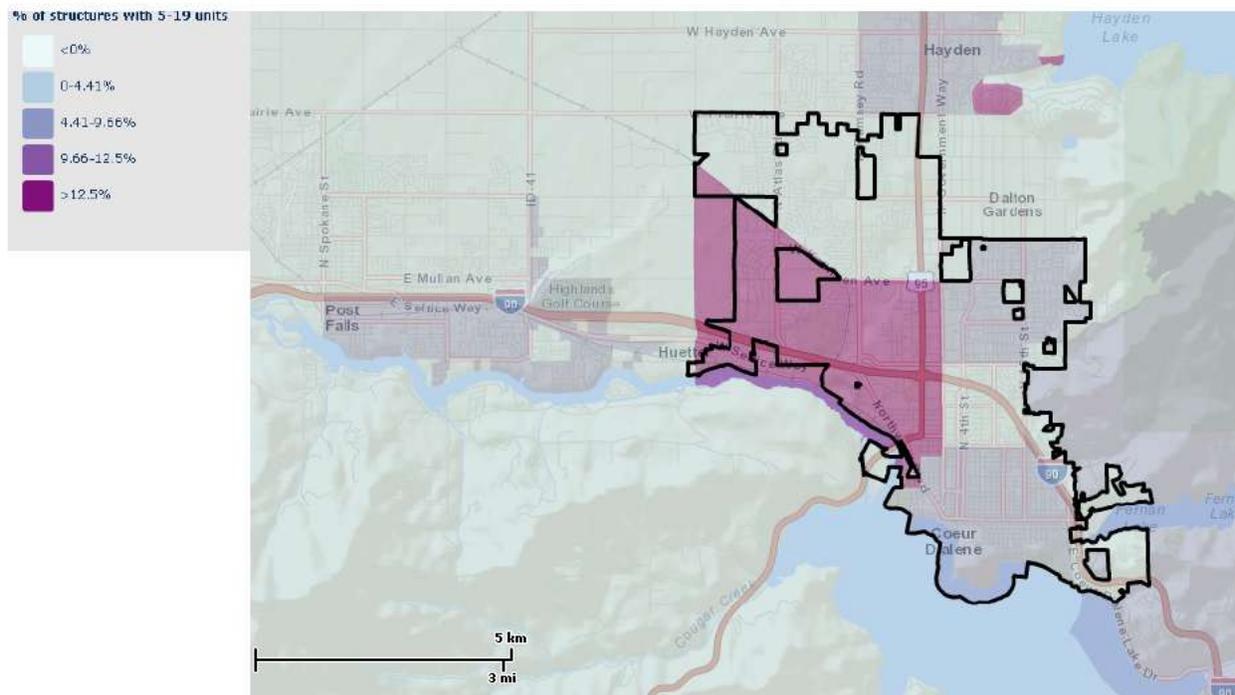
Property Type	Number	%
1-unit detached structure	17,245	72%
1-unit, attached structure	655	3%
2-4 units	2,129	9%
5-20 units	1,826	8%
More than 20 units	875	4%
Mobile Home, boat, RV, van, etc	1,094	5%
Total	23,824	100%

Table 26 – Rental Properties by Unit Number

Data Source: 2005-2009 ACS Data

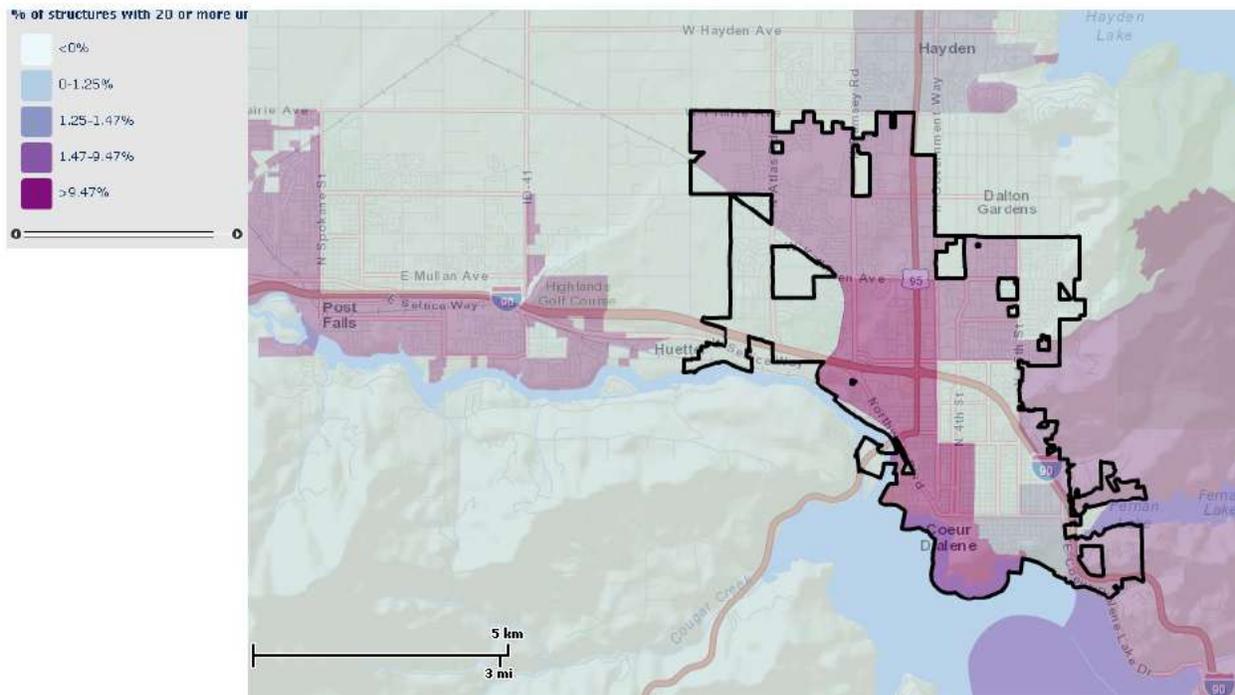
Percent of Structures With 5-19 Units

Consolidated Plan and Continuum of Care Planning Tool



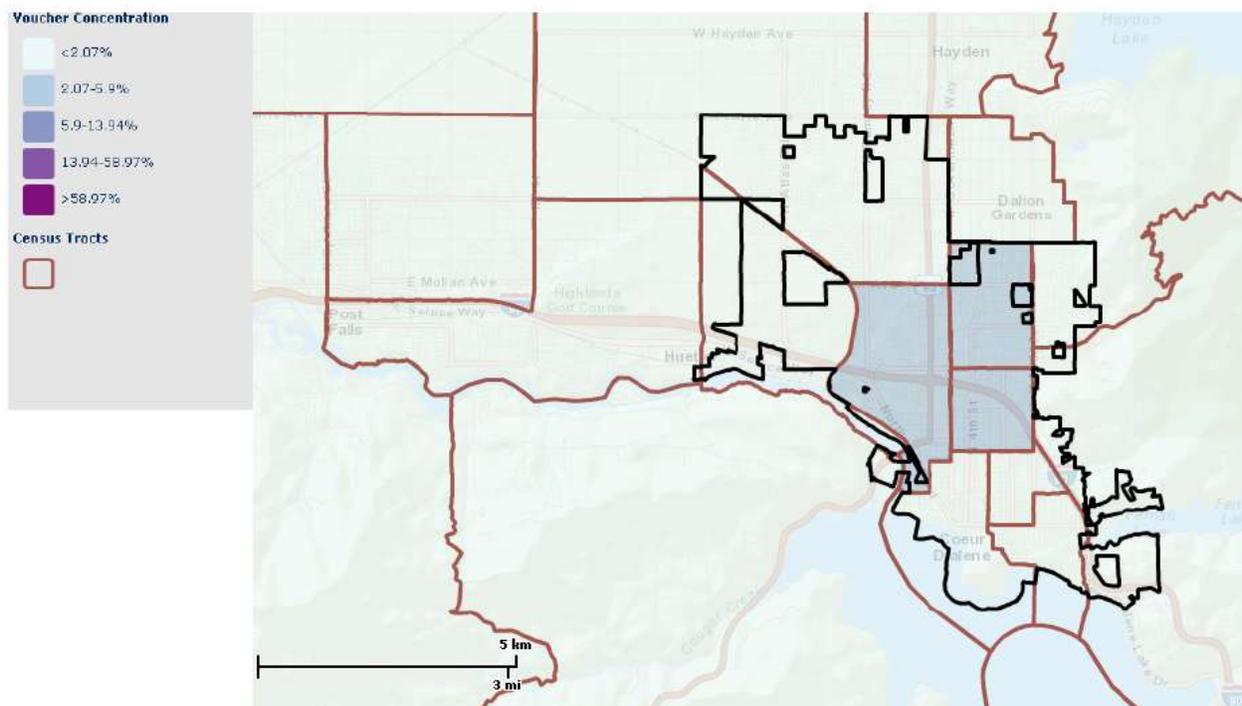
Percent of Structures With 20 Or More Units

Consolidated Plan and Continuum of Care Planning Tool



Voucher Concentration

Consolidated Plan and Continuum of Care Planning Tool



Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	0	0%	225	3%
1 bedroom	282	3%	1,364	19%
2 bedrooms	1,913	19%	3,361	46%
3 bedrooms	7,731	78%	2,369	32%
Total	9,926	100%	7,319	100%

Table 27 – Unit Size by Tenure

Data Source: 2005-2009 ACS Data

Number and Targeting of Units

Affordable housing programs available to Coeur d'Alene residents include the LIHTC program; the HOME program; the Project-Based Section 8 program; and the Section 8 Housing Choice Voucher program. Combining the LIHTC, HOME and Project-Based Section 8 programs, there are 869 family units, 461 elderly units, and 175 handicapped accessible units in Coeur d'Alene offering subsidized rental housing.

As of January 2011, there were 12 low income housing tax credit and HOME developments in Coeur d'Alene. These developments had 554 family units, 145 units for seniors, and 108 were accessible to persons with disabilities.

Since 2007, CDBG funds were leveraged to construct 4 rental units with HUD 811 grants. Although no CDBG funds were used, through a land lease, the City supported 37 units of HUD 202 units and 14 of HUD 811 units (currently under construction). CDBG funds also leveraged IHFA tax credit allocations for an additional 77 affordable units in the City.

Units Expected to be lost from Inventory

The 2011 Analysis of Impediments to Fair Housing (AI) identified seven facilities comprising 403 units of Project-Based Section 8 housing in Coeur d'Alene. Of the total, 156 are designated as family units; 210 units are set aside for the elderly; and 37 units are accessible to persons with disabilities. The 2011 AI further states that HUD maintains a database of subsidized units that utilized government contracts which are time-limited. Upon maturity of these contracts, property owners may elect to convert their units to market rates. A review of the HUD "expiring use" database found that, of the Project-Based Section 8 units, 147 units were subject to expiration in 2010; 136 units in 2011; and 109 units in 2012.

Does the availability of housing units meet the needs of the population?

The City continues to struggle to house its lowest income renters. In 2007, a gap of 861 units existed for renters earning less than \$15,000 per year. The gap increased to 1,070 units in 2011. Renter households earning \$20,000 per year or less account for 33% of all total households, resulting in a rental gap of nearly 1,500 units for these households. Section 8 Vouchers may provide some financial relief for low income families in Coeur d'Alene, but with wait times exceeding three years, Vouchers provide little to no short-term relief for many households.

Need for Specific Types of Housing

The City's housing market is not drastically different in 2011 compared with 2007. Many of the challenges the City faced in providing its residents with affordable and quality housing in 2007 remain, while some changes have occurred. The City continues to struggle to house its lowest income renters. In 2007, a gap of 861 units existed for renters earning less than \$15,000 per year. In 2011 the gap increased to 1,070 units. It is suspected that much of this is a result of economic conditions. If the City maintains the same level of population growth as experienced between 2000 and 2009, and these renters experience the same population growth as the City overall, and no new units are developed to assist this group, this need will increase to approximately 1,117 units in 2017. This 10% increase is based on the number and percent of extremely low income households as reported in the 2005-2009 CHAS data.

Housing affordable for the City's workforce continues to be a need in the City. Competition is high for quality rental and for sale homes priced affordably for the City's workforce. Stakeholders contributing to the 2007 market study identified the City's workforce as a segment of the population in need of affordable housing opportunities, and analysis completed in the 2011 report revealed the same need. Housing quality is still a concern for homeowners. According to the 2011 resident survey, 44% of homeowners said they have repairs they need to make to their home.

Discussion

The wait period for a HUD Section 8 Voucher has increased from 28 months in 2007 to more than 44 months in 2012. As such, it has become even more challenging to obtain a Section 8 Voucher from the IHFA to use in Coeur d'Alene. This indicates even greater need for affordable housing opportunities in the City to meet unmet demand from the Section 8 Voucher program.

MA-15 Cost of Housing

Introduction

Coeur d'Alene's renters and homeowners have experienced increases in housing costs which have exacerbated the housing needs of the City's lowest income residents. The first chart under Rent Paid displays the results of the gaps analysis for the City.

The ACS reported a 2009 median contract rent (without utilities) in Coeur d'Alene of \$642 and a median gross rent (with utilities) of \$773. The resident survey produced a higher median contract rent of \$800 and a median gross rent of \$870. As seen in the second chart under Rent Paid, most rental units in 2009 were priced between \$500 and \$750, which is a shift from 2000 when more than half of the City's rental units required rents of \$500 or less. Additionally, in 2000, less than 10% of the rental units in the City required rents of \$750 or more; currently, 35% of the City's rental units rent for \$750 or more per month.

Cost of Housing

	Based Year: 2000	Most Recent Year: 2009	% Change
Median Home Value	105,300	194,200	84%
Median Contract Rent	487	633	30%

Table 28 – Cost of Housing

Data Source: 2005-2009 ACS Data

Rent Paid	Number	%
Less than \$500	1,823	24.9%
\$500-999	4,948	67.6%
\$1,000-1,499	474	6.5%
\$1,500-1,999	47	0.6%
\$2,000 or more	27	0.4%
Total	7,319	100.0%

Table 29 - Rent Paid

Data Source: 2005-2009 ACS Data

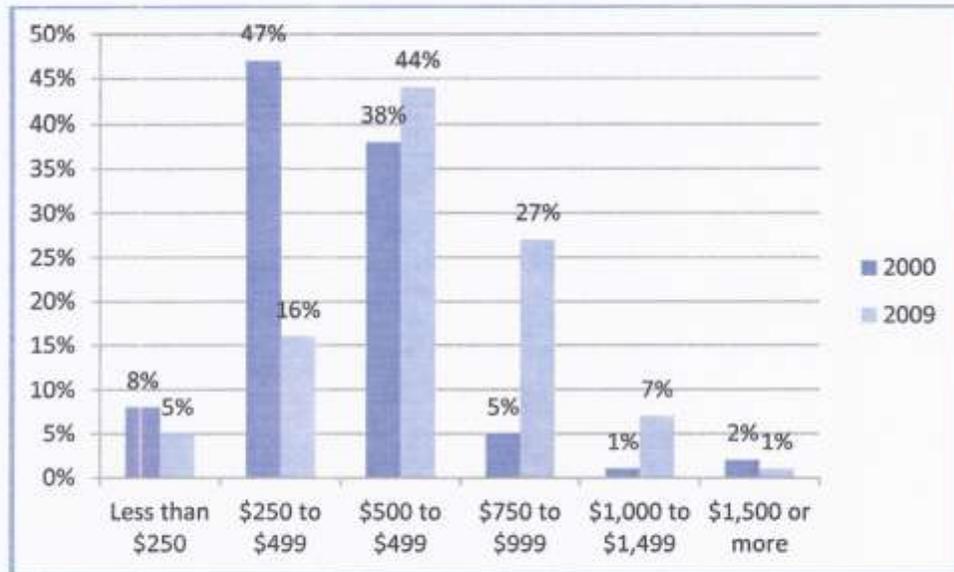
Rental Gap, Coeur d'Alene, 2011

Income Range	Renters		Maximum Affordable Rent	Total Rental Units & Vouchers		Rental Gap
	Number	Percentage		Number	Percentage	
\$ 0 - \$ 4,999	284	4%	\$ 75	183	2%	-101
\$ 5,000 - \$ 9,999	539	7%	\$ 175	435	5%	-104
\$ 10,000 - \$ 14,999	998	13%	\$ 300	133	2%	-865
\$ 15,000 - \$ 19,999	656	9%	\$ 425	274	3%	-382
\$ 20,000 - \$ 24,999	611	8%	\$ 525	1,183	15%	572
\$ 25,000 - \$ 34,999	1,298	17%	\$ 775	3,256	41%	1,958
\$ 35,000 - \$ 49,999	1,213	16%	\$1,150	2,062	26%	849
\$ 50,000 - \$ 74,999	1,174	16%	\$ 1,750	325	4%	-846
\$ 75,000 - \$ 99,999	331	4%	\$2,375	79	1%	-252
\$ 100,000 - \$ 149,999	230	3%	\$ 3,600	0	0%	-230
\$ 150,000 or more	107	1%	\$4,825	0	0%	-107
TOTAL	7,441	100%		7,933	100%	

Source: BBC Research & Consulting, 2011

Chart 1 - Rental Gap

Contract Rent Distribution, Coeur d'Alene 2000 and 2009



Source: U.S. Census Bureau, 2000 and 2007-2009 American Community Survey 3-year estimates.

Chart 2 - Contract Rent Distribution

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	No Data	No Data
50% HAMFI	No Data	No Data
80% HAMFI	No Data	No Data
100% HAMFI	No Data	No Data
Total	0	0

Table 30 – Housing Affordability

Alternate Data Source Name:

CPD Maps

Data Source Comments:

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	480	572	724	1,021	1,231
High HOME Rent	0	0	0	0	0
Low HOME Rent	0	0	0	0	0

Table 31 – Monthly Rent

Data Source Comments: FY2013 Fair Market Rent Documentation System, Kootenai County, Idaho. Source: 222.huduser.org/portal/datasets/fmr/fmrs/FY2013_code/2013summary.odn

Availability of Sufficient Housing

Renter households earning \$20,000 per year or less account for 33% of all total households. Only 12% of the City's rental units are priced affordably for these households, resulting in a rental gap of nearly 1,500 units for these households. Another gap is for those households earning \$50,000 or more. The rental market has not been developed to accommodate for this price point, primarily because higher earning renters more often opt for homeownership. Additionally, if high-earning renter households chose to rent, they are also able to rent from the abundance of units priced affordably for lower income levels. A rental gap exists in many communities for renter households with incomes high enough to purchase homes.

Expected Change of Housing Affordability

Housing is "affordable" if no more than 30% of a household's monthly income is needed for rent, mortgage payments and utilities. When the proportion of household income needed to pay housing costs exceeds 30%, a household is considered "cost burdened." Coeur d'Alene's renters and homeowners alike have experienced increases in housing costs, which have exacerbated the housing needs of the City's lowest income residents. Additional affordable housing will be necessary if the trend in housing cost increases continues.

Rent Comparison

Most rental units in 2009 were priced between \$500 and \$750, with the median gross rent at \$773. The FY2013 Fair Market Rent Document System (Source: HUD) identifies rents between \$480 for an efficiency to \$1,172 for four bedrooms.

Discussion

The current trend in building permits in the City of Coeur d'Alene is multi-family dwelling rental units. With 135 units currently under construction, it is estimated that most of the units will be offered at Fair Market Rates.

MA-20 Condition of Housing

Introduction

Census data reports that nearly half (46%) of owner-occupied housing and renter-occupied housing were built before 1980. Housing gaps identified in the 2011 Analysis of Impediments to Fair Housing Choice identified that there is an existing shortage of about 1,070 affordable housing units, and anticipated to increase to approximately 1,117 units by 2017.

Census data also identifies that in 2000, the median value of owner-occupied units was \$105,000; yet adjusted for inflation for 2010 dollars; it would have been \$132,960. The 2008-2010 3-year estimates identify that the current median value of owner-occupied housing units is \$196,000. Using the same Census data for median gross rent, in 2000 it was \$555 (\$705 adjusted for 2010), and increased to \$720 in the 2008-2010 3-year estimates.

Housing stock available to those with special needs include the Low Income Housing Tax Credit program; the HOME program; the Project-Based Section 8 program; and the Section 8 Housing Choice Voucher program. Each of these programs is available through, and managed by, the IHFA.

Definitions

Units are in standard condition if they meet the HUD Section 8 quality standards. Units that are substandard but suitable for rehabilitation do not meet one or more of the HUD Section 8 quality standards. These units are also likely to have deferred maintenance and may have some structural damage such as leaking roofs, deteriorated interior surfaces, and inadequate insulation.

A unit is defined as being substandard if it is *lacking the following*: complete plumbing, complete kitchen facilities, public or well water systems and heating fuel (or uses heating fuel that is wood, kerosene or coal).

Units that are substandard but suitable for rehabilitation include units with some of the same features of substandard units. The difference between substandard and substandard but suitable for rehabilitation is that units suitable for rehabilitation will have in place infrastructure that can be improved upon. In addition, these units might not be part of public water and sewer systems, but they will have sufficient systems to allow for clean water and adequate waste disposal.

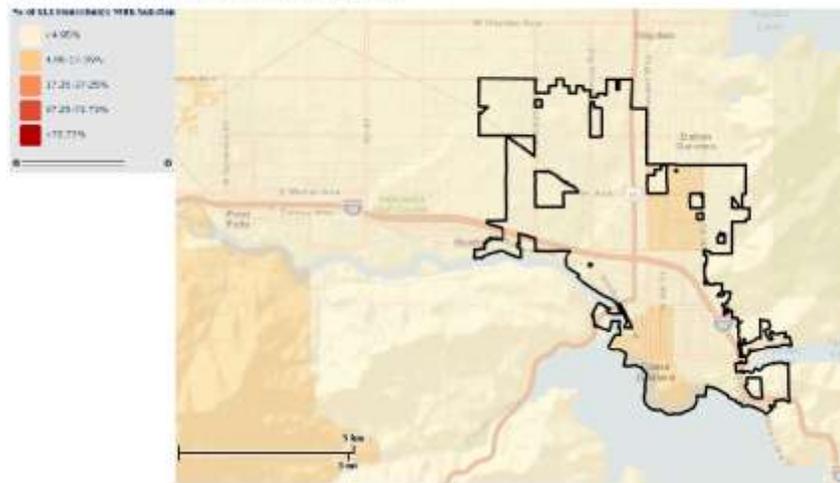
Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	3,471	35%	3,448	47%
With two selected Conditions	105	1%	130	2%
With three selected Conditions	0	0%	0	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	6,350	64%	3,741	51%
Total	9,926	100%	7,319	100%

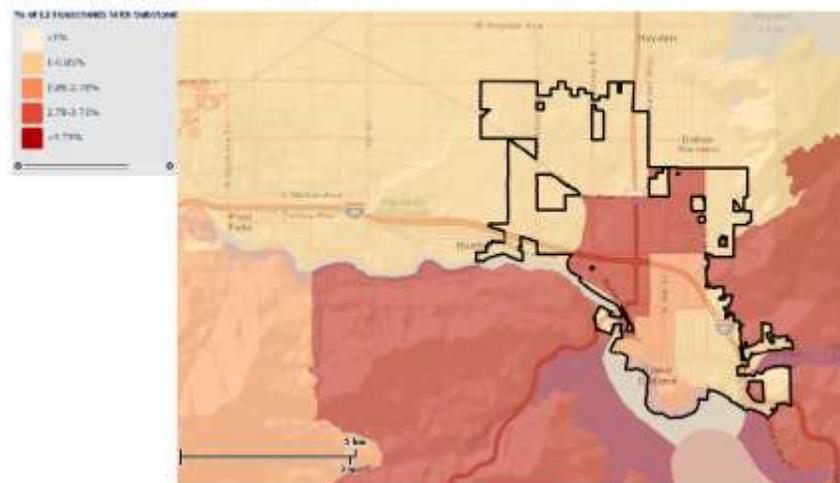
Table 32 - Condition of Units

Data Source: 2005-2009 ACS Data

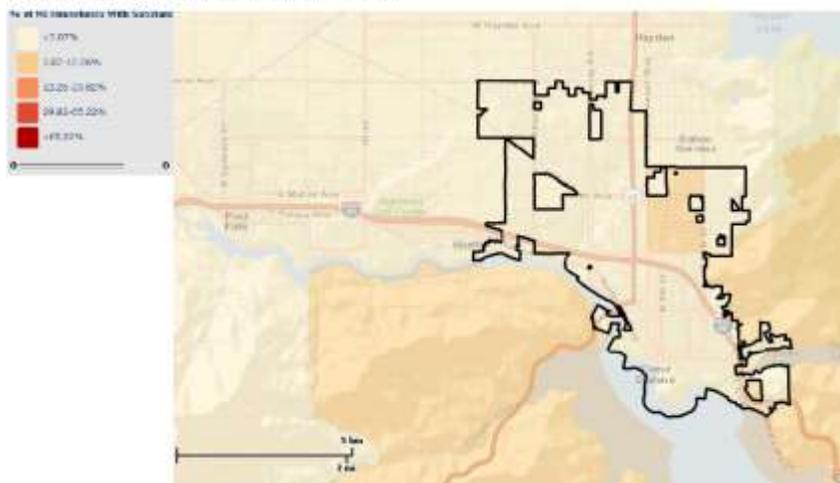
Concentration of ELI Households with Substandard Conditions
 Consolidated Plan and Continuum of Care Planning Tool



Low Income Households With Substandard Conditions
 Consolidated Plan and Continuum of Care Planning Tool



Moderate Income Households With Substandard Conditions
 Consolidated Plan and Continuum of Care Planning Tool



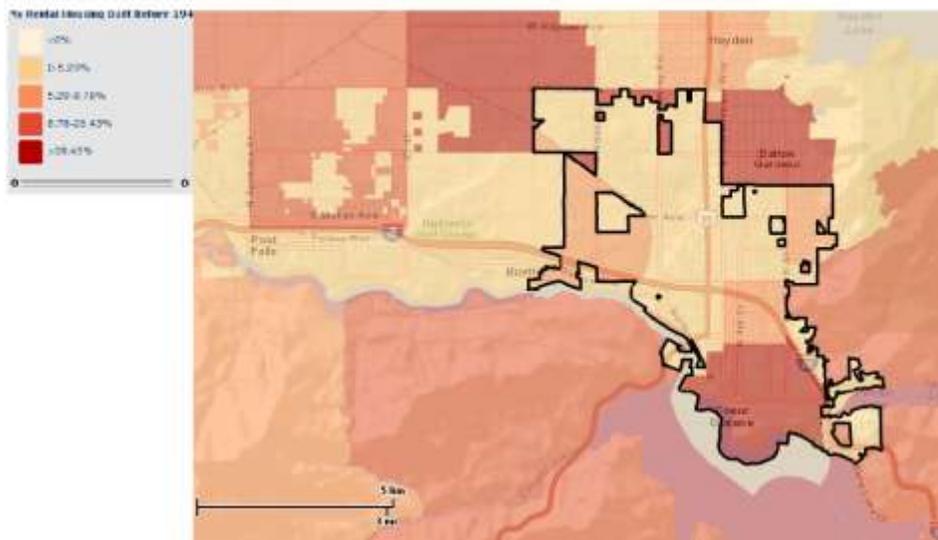
Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	2,239	23%	1,407	19%
1980-1999	3,162	32%	2,513	34%
1950-1979	2,822	28%	2,427	33%
Before 1950	1,703	17%	972	13%
Total	9,926	100%	7,319	99%

Table 33 – Year Unit Built

Data Source: 2005-2009 CHAS

Rental Housing Built Before 1949 Consolidated Plan and Continuum of Care Planning Tool



Risk of Lead-Based Paint Hazard

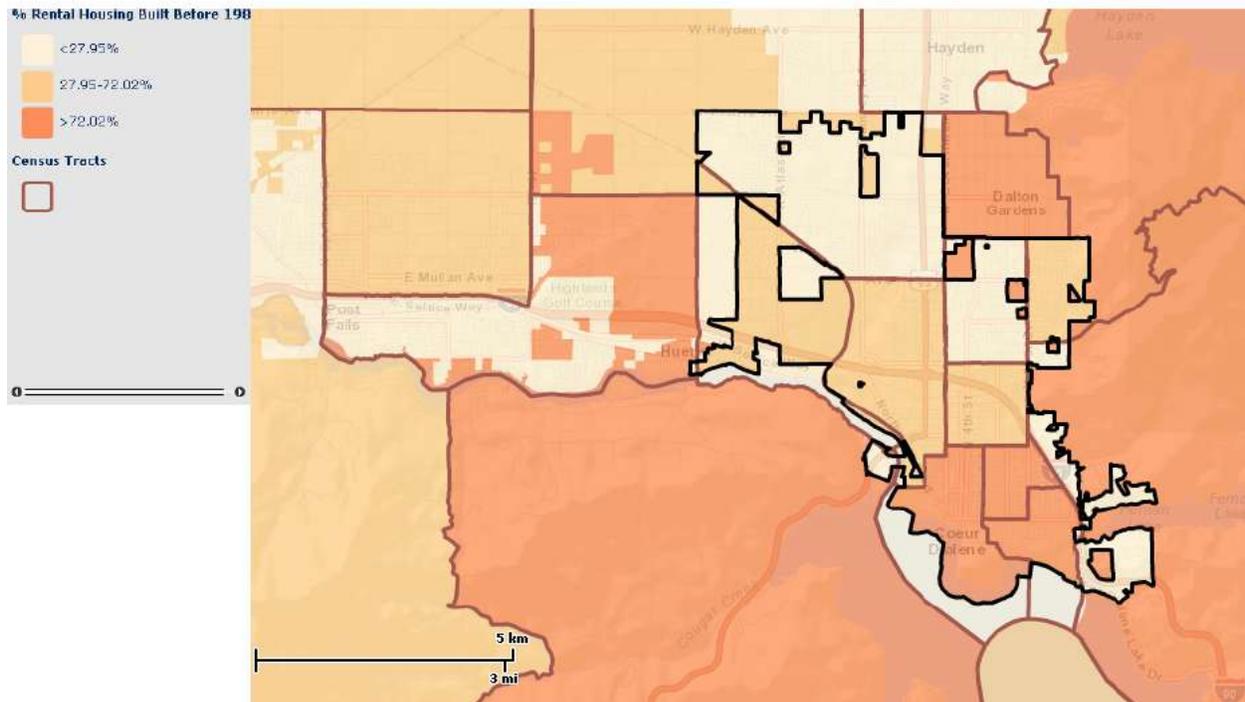
Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	4,525	46%	3,399	46%
Housing Units Built Before 1980 with Children Present	1,139	11%	415	6%

Table 34 – Risk of Lead-Based Paint

Data Source: 2005-2009 CHAS

Rental Housing Built Before 1980

Consolidated Plan and Continuum of Care Planning Tool



Vacant Units

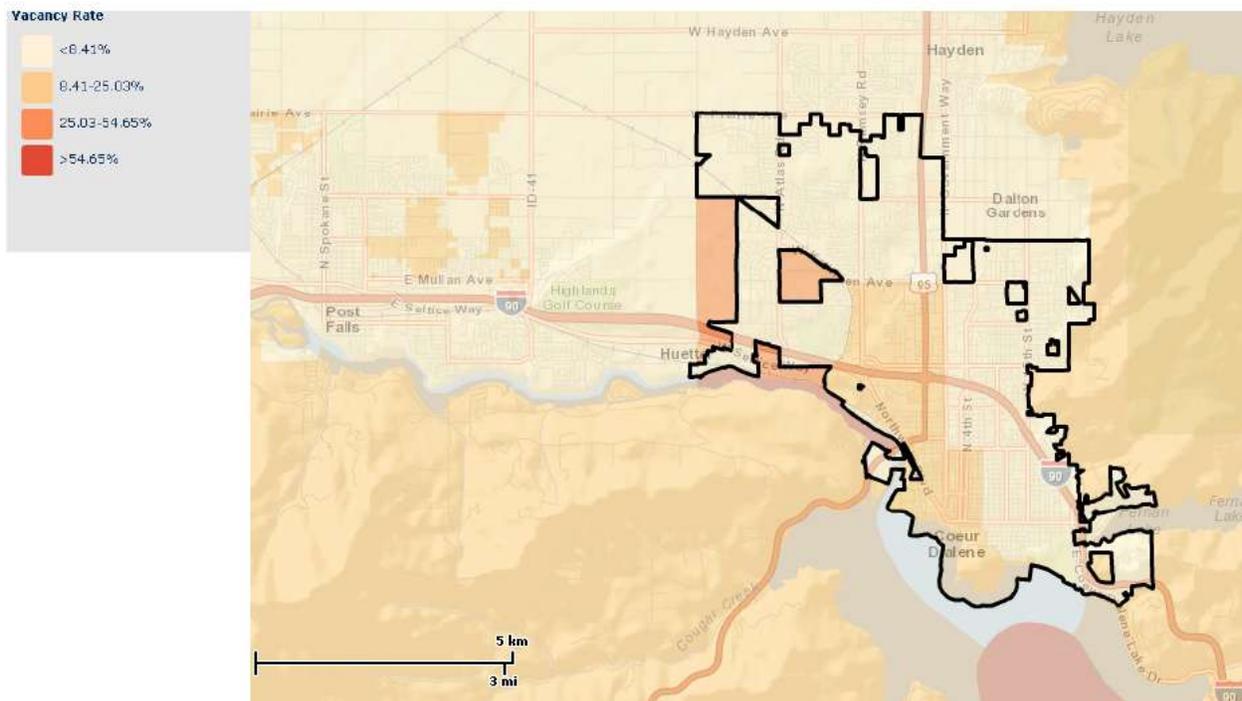
	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 35 - Vacant Units

Data Source Comments:

Vacancy Rate

Consolidated Plan and Continuum of Care Planning Tool



Need for Owner and Rental Rehabilitation

Over all, most properties in the LMI Census Tract areas are in sound condition or need minor repairs. In Program Year 2008 the City instituted the Emergency Minor Repair and Accessibility Program (EMRAP). This program provides up to \$5,000 in grant funding to correct substandard conditions eligible for rehabilitation, such as broken sewer lines, leaking roofs, sagging floors, inoperable furnaces or hot water heaters, etc. Since 2008, 36 homes have been repaired to livable conditions. This single activity is the most successful of the City's CDBG program, and with every program year, there are more applications received from homeowners than funding allows.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

According to the 2006-2010 ACS data, an estimated 9.6% (1,831 units) were built before 1940 when lead-based paint was most common. Another 11% (2,096 units) were built between 1940 and 1960, when lead-based paint was still used, but the amount of lead in the paint was being reduced.

The 2007-2011 ACS data for Total Housing Units and Year Structure Built by Census Tract identifies over 11,000 housing units constructed prior to 1980 within eleven Census Tracts; however, six of the Census Tracts contain property outside Coeur d'Alene City limits. As a result, calculations were made by using both the 2007-2011 ACS and the HUD Percent of Low and Moderate Income Persons by Census Tract and Block Group, 2000 Census. Populations on the HUD percent of LMI persons were converted to households using the average household size in Coeur d'Alene of 2.93, and then multiplied by the LMI % for each Tract and Block Group, resulting in 4,912 households in the eleven Census Tracts. The 2007-2011 ACS data was used to calculate the percent of housing units on the total number of structures built pre-1980 for each Tract. The resulting percentages of total housing units were then multiplied by the total of LMI households. This methodology provided an estimate of 2,517 LMI households within Coeur d'Alene City Limits. Constructed prior to 1980 and therefore may contain lead based paint. This assumption does not include property vacancies, nor does it include households that may have been remediated of lead based paint hazards since 1980.

Discussion

The January 1, 2012 Comprehensive Housing Market Analysis by the HUD Office of Policy Development and Research reports that the "rental housing market conditions in the Coeur d'Alene Housing Market Area (HMA) are tight, with an overall rental vacancy rate estimated at 5.5 percent, down from the 7.7 percent rate recorded in April 2010. During the forecast period, demand is estimated for about 1,050 rental units."

MA-25 Public and Assisted Housing

Introduction

The IHFA has 76 public housing units in the State of Idaho. Shoshone Apartments in Kellogg, Idaho has 47 units. The remaining 29 units are in Idaho Falls in Southeastern Idaho. There are no public housing units in Coeur d'Alene.

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
				Veterans Affairs Supportive Housing	Family Unification Program	Disabled *			
# of units vouchers available			76						
# of accessible units									
# of FSS participants									
# of FSS completions									

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

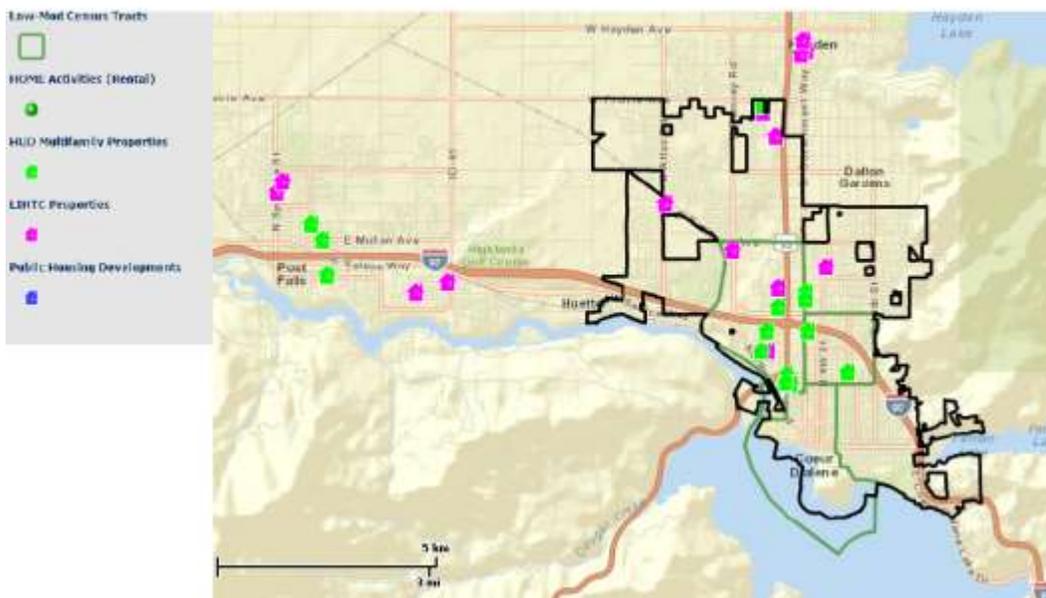
Table 36 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Source:

Housing Activities Map

Consolidated Plan and Continuum of Care Planning Tool



Supply of Public Housing Development

The City does not have a public housing authority in operation. The IHFA administers the Section 8 program in Coeur d'Alene. Affordable housing programs available to residents in Coeur d'Alene include the LIHTC program; the HOME program; the Project-Based Section 8 program; and the Section 8 Housing Choice Voucher program. Combining the LIHTC, HOME and Project-Based Section 8 programs, there are 869 family units, 461 elderly units, and 175 handicapped accessible units in Coeur d'Alene offering subsidized rental housing.

It is unknown the number and physical condition of the public housing units. The LIHTC program provides a developer with Federal Tax Credits to build or rehabilitate housing for low-income persons. The Federal HOME program provides subsidies to construct or rehabilitate affordable rental housing.

Public Housing Condition

Public Housing Development	Average Inspection Score
N/A	N/A

Table 37 - Public Housing Condition

Restoration and Revitalization Needs

There are no public housing units in the City of Coeur d'Alene.

Strategy of Improving the Living Environment of low- and moderate Income Families

Not Applicable.

Discussion

The Section 8 Voucher wait period has increased from about 2-1/2 years in 2008 to over 3 years now. Although there are no public housing units in Coeur d'Alene, there is a demonstrated need for subsidized units, in part, due to the Section 8 Voucher period.

MA-30 Homeless Facilities

Introduction

The City of Coeur d'Alene receives no funding beyond the CDBG Entitlement for homelessness activities. St. Vincent de Paul North Idaho distributes McKinney-Vento funding through the Supportive Housing Program (SHP), Shelter Plus Care Program (S+C) and the Emergency Shelter Grant Program (ESG). The City works closely with local organizations such as St. Vincent de Paul, North Idaho Housing Coalition, the Committee to End Homelessness, IHFA, the Regional Homeless Coalition (Continuum of Care) and other government and non-profit organizations to identify areas of need and appropriate activities to mitigate the problems as resources allow.

For persons experiencing homelessness and women who are domestic violence victims, there are 6 emergency shelters in the County to assist these persons: Children's Village, St. Vincent de Paul Women's Shelter, St. Vincent de Paul Men's Shelter, St. Pius Church, 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 to 68 people in need of housing because they are homeless.

In addition, Family Promise of North Idaho is an interfaith effort to assist homeless families achieve independence. The focus of Family Promise is to keep families together by allowing them to sleep in one of 17 local host churches, for a week at a time up to 90 days. Families receive support services, food, and a temporary safe place to sleep.

Facilities Targeted to Homeless Persons

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	13	0	113	0	0
Unaccompanied Youth	44	0	0	0	0
Households with Only Adults	0	0	0	0	0
Chronically Homeless Households	0	0	0	0	0
Veterans	11	0	0	0	0

Table 38 - Facilities Targeted to Homeless Persons

Data Source

Data obtained from Coeur d'Alene 2008-2012 Consolidated Plan

Comments:

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

Although not funded by CDBG, the City supports an innovative partnership lead by St. Vincent de Paul, the H.E.L.P. Center is an excellent start to transitioning people to independence. This program provides office space and basic operating functions in a "one stop shop" so that LMI persons can make inquiries and receive services from employment searches to housing assistance, to basic health care with various organizations represented on site. 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 flexible as possible, within the confines of established regulations, to address the conditions and circumstances adherent to Coeur d'Alene.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

The 2012 Annual Point-In-Time count found there are 427 homeless individuals on the street, in shelters, and in transitional housing. The 10-year Plan to End Homelessness Committee found there are \$6.5 million in services already being provided in Coeur d'Alene and the surrounding community. Approximately 1,300 volunteers assist in providing services to the homeless, including warming shelters, and community kitchens which open when the temperature falls below 20 degrees. Aggregate statistics are collected for Kootenai County (not just Coeur d'Alene). Housing First, administered by St. Vincent de Paul, is a model that has been promoted by the Federal Government and as implemented will be customized for the local realities in Coeur d'Alene.

Under a HPRP grant, St. Vincent de Paul has been tracking accomplishments in two categories: homeless prevention and rapid re-housing. Under the homeless prevention program 349 have been served; and under the rapid re-housing program 209 individuals have been served. Additionally, St. Vincent de Paul operates a homeless family sheltering project under an Angel Arms grant they received that provides funding for 10 single unit apartments for chronically homeless individuals. The program also provides intensive weekly case management, which begins with a self-sufficiency plan that includes job training services, substance abuse counseling, Life Skills classes, parenting classes, and financial literacy classes.

MA-35 Special Needs Facilities and Services

Introduction

Due to lower incomes and the need for supportive services or structural adaptations, special needs groups are more likely than the general population to encounter difficulty in finding and paying for adequate housing, and often require enhanced community services. This section provides summary background information on special needs populations in Coeur d'Alene and describe the housing programs available to serve these groups.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

In most communities, there is no one affordable housing product that addresses the wide range of housing needs. The amount and type of housing assistance lower-income households need to avoid being cost burdened varies depending on their income and household characteristics. For example, persons who have a physical disability may require special adaptations to their homes. Persons with mental illnesses and/or developmental disabilities might need housing with health care services nearby. Families living in poverty usually need large subsidies to help them pay their rent costs.

The City does not have housing set aside just for individuals with HIV/AIDS and their families. The North Idaho Aids Coalition (NIAC) is contracted with IHFA to provide grant application assistance, utility assistance, short term rent, mortgage and utility assistance, and case management for the HOPWA to prevent homelessness for HIV positive individuals that qualify for the services.

The following spreadsheet identifies the assisted living facilities in Kootenai County as of January 2006. These facilities serve the elderly and those with Alzheimer's, Dementia, Developmentally Disabled, Physically Disabled, and those with other mental illnesses or with traumatic brain injuries.

Assisted Living Facilities in Kootenai County as of January 2006

Name	City	Number of Beds	Type
Adult Residential Care Home II	Coeur d'Alene	8	Elderly/Alzheimer's/Dementia/Mental Illness
Beehive Homes of North Idaho—A	Coeur d'Alene	10	Elderly/Alzheimer's/Dementia/Mental Illness/Developmentally Disabled
Beehive Homes of North Idaho—B	Coeur d'Alene	10	Elderly/Alzheimer's/Dementia/Mental Illness/Developmentally Disabled
Beehive Homes of North Idaho—C	Coeur d'Alene	10	Elderly/Alzheimer's/Dementia/Mental Illness/Developmentally Disabled
Bestland Retirement Community	Coeur d'Alene	N/A	N/A
Birch Avenue Retirement Center	Coeur d'Alene	8	Elderly
Coeur d'Alene Homes	Coeur d'Alene	36	Elderly/Developmentally Disabled/Mental Illness
Courtyard on Sherman	Coeur d'Alene	15	Elderly/Alzheimer's/Dementia/Mental Illness/Developmentally Disabled
Loyalton of Coeur d'Alene	Coeur d'Alene	96	Elderly
Fairwinds	Coeur d'Alene	35	Elderly
Four Seasons Assisted Living	Coeur d'Alene	58	Elderly/Alzheimer's/Dementia
Hayden View Cottage	Coeur d'Alene	8	Elderly/Alzheimer's/Dementia/Mental Illness/Developmentally Disabled/ Physically Disabled
Legends Park Assisted Living Community	Coeur d'Alene	45	Elderly
Preferred Living	Coeur d'Alene	8	Elderly
Sherman Avenue Beehive	Coeur d'Alene	8	Elderly
Forever Young	Hayden	3	Elderly
Harmony House Assisted Living I	Hayden	12	Elderly/Alzheimer's/Dementia/Mental Illness/Developmentally Disabled/Physically Disabled/Traumatic Brain Injury
Harmony House Assisted Living II	Hayden	13	Developmentally Disabled/Mental Illness/Physically Disabled/Traumatic Brain Injury
Hayden Country Guest Home III	Hayden	45	Elderly/Alzheimer's/Dementia
Lark's Haven	Hayden	12	Elderly/Developmentally Disabled
Sylvan House	Hayden	45	Elderly/Alzheimer's/Dementia/Developmentally Disabled
Wellspring Meadows Assisted Living	Hayden	15	Elderly/Alzheimer's/Dementia
Autumn Haven I	Hayden Lake	15	Elderly/Alzheimer's/Dementia
Autumn Haven II	Hayden Lake	11	Elderly/Alzheimer's/Dementia
Elite Care II	Hayden Lake	15	Elderly/Alzheimer's/Dementia
Elite Care LTD	Hayden Lake	9	Elderly/Alzheimer's/Dementia
Garden Homes	Post Falls	15	Elderly/Alzheimer's/Dementia
Guardian Angel Homes	Post Falls	60	Elderly/Alzheimer's/Dementia
Haven Acres Residential Care	Post Falls	9	Elderly/Alzheimer's/Dementia
Living Springs	Post Falls	14	Elderly/Alzheimer's/Dementia/Mental Illness/Developmentally Disabled
Generations Assisted Living & Wellness	Rathdrum	15	Elderly/Alzheimer's/Dementia
Aspen Springs Pioneer Homes	Spirit Lake	12	Elderly
Rose Terrace Country Homes	Spirit Lake	45	Elderly/Alzheimer's/Dementia
County Total		720	
Total in Coeur d'Alene		355	
Percent in Coeur d'Alene		49%	

Source: *Residential Care Facility/Assisted Living*, The State of Idaho, January 12, 2006, Bureau of Facility Standards, Idaho Department of Health and Welfare, www.elderlivingcenter.com and BBC Research & Consulting 2008. NOTE: The Idaho Department of Health and Welfare no longer produces the *Residential Care Facility/Assisted Living* report; therefore, January 12, 2006 is the most up-to-date report available.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

The Section 811 program provides rental housing to very low-income households with disabilities where rents are based on income. To qualify for assistance, at least one member of a household must be 18 or older with a physical, developmental and/or mental disability. Additionally, Trinity Group Homes provides homeless and non-homeless housing for those with mental illnesses.

For persons unable to live alone, including the elderly and persons with disabilities, there are 32 assisted living facilities in the County from which to choose. As shown in the "Assisted Living Facilities in Kootenai County as of January 2006" above, there are 720 beds for persons with disabilities and the elderly in Kootenai County. Almost half (49%) of the beds are located in 14 developments in Coeur d'Alene. The majority of the remaining facilities are in the City of Hayden. All of the facilities specifically target the elderly except for Harmony House Assisted Living I and II, which targets persons with severe needs: developmentally disabled, physically disabled, patients with traumatic brain injury and persons with mental illness.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

Through participation in the Region I Continuum of Care Coalition, the City will continue to be supportive in addressing housing and those with special needs. This activity falls under Goal 6 - Public Service to offer public service program assistance to service organizations supporting LMI residents. Additionally, the City is providing land for the construction of a 14-unit HUD 811 complex that is scheduled for completion in August 2014.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

Although CDBG funding is not involved, the City has an on-going land-lease partnership with St. Vincent de Paul for HUD 811 housing. The next year will bring an additional partnership with St. Vincent de Paul for new construction of a HUD 811 apartment complex (14 units).

MA-40 Barriers to Affordable Housing

Negative Effects of Public Policies on Affordable Housing and Residential Investment

A zoning, land use, and housing policy review was completed in conjunction with a statewide Analysis of Impediments to Fair Housing in 2011. The statewide study revealed that there 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. A few important differences of the City from the County's housing barrier analysis include the following:

- The City allows for 300 SF accessory dwelling units (ADU) in all 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 induce workforce housing development. Four square feet of floor area is allowed for each square foot of workforce housing provided within 1.5 miles of the project site and within City limits.
- The County's minimum lot size of 3,000 square feet was among the lowest reviewed in the State. Coeur d'Alene accommodates pocket residential in the R-8, R-12, and R-17 residential districts, as well as the C-17L and C-17 commercial districts. Pocket residential has no lot size and setback minimums on the site, but overall density is set by the zoning.

MA-45 Non-Housing Community Development Assets

Introduction

There is more employment in the City of Coeur d'Alene than in the remainder of Kootenai County, providing over 20,000 jobs, representing 32.5% of all jobs in the County. This is similar to the proportion of the County population that resides in Coeur d'Alene (32.8%). According to the HUD Comprehensive Market Analysis for Coeur d'Alene, published in January 2012, economic conditions have been weak in the Coeur d'Alene housing market area since 2009, but are beginning to improve.

Unemployment rates across the nation have skyrocketed since the economic downturn, and Coeur d'Alene is no exception, with an all-time low in 2006 of 3.1% to the 10.3% in 2011. Increased poverty is typically linked to rising unemployment. The Census reports Coeur d'Alene's poverty rate at 12.8% in 2000, compared with the most current data of 13.9% (2006-2010 ACS 5-Year Estimates).

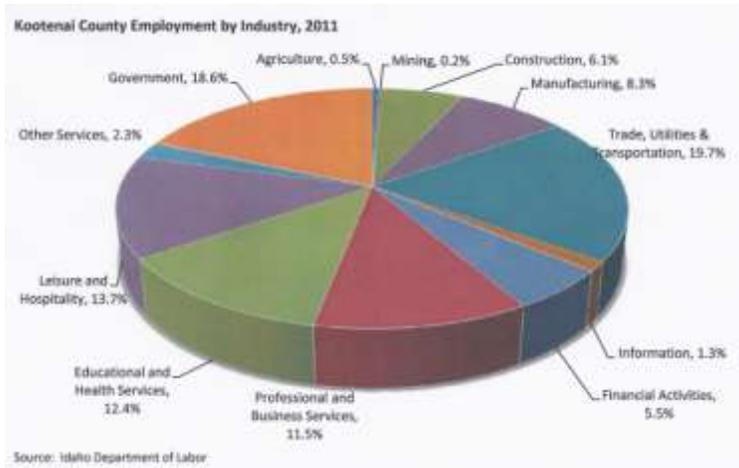
Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Total Workers	Total Jobs	Share of Workers	Share of Jobs	Jobs less workers
Agriculture, Mining, Oil & Gas Extraction	325	177	0	0	2	1	-1
Construction	2,459	668	0	0	12	3	-9
Manufacturing	1,502	138	0	0	7	1	-6
Wholesale Trade	378	724	0	0	2	4	2
Retail Trade	2,869	2,972	0	0	14	15	1
Transportation and Warehousing	549	95	0	0	3	0	-3
Information	359	345	0	0	2	2	0
Finance, Insurance, and Real Estate	1,456	1,701	0	0	7	9	2
Professional, Scientific, Management Services	2,020	1,206	0	0	10	6	-4
Education and Health Care Services	3,668	4,570	0	0	18	24	6
Arts, Entertainment, Accommodations	3,238	3,325	0	0	16	17	1
Other Services	989	708	0	0	5	4	-1
Public Administration	886	2,726	0	0	4	14	10
Total	20,698	19,355	0	0	102	100	-2

Table 39 - Business Activity

Data 2005-2009 ACS (Workers), 2010 ESRI Business Analyst Package (Jobs)
Source:

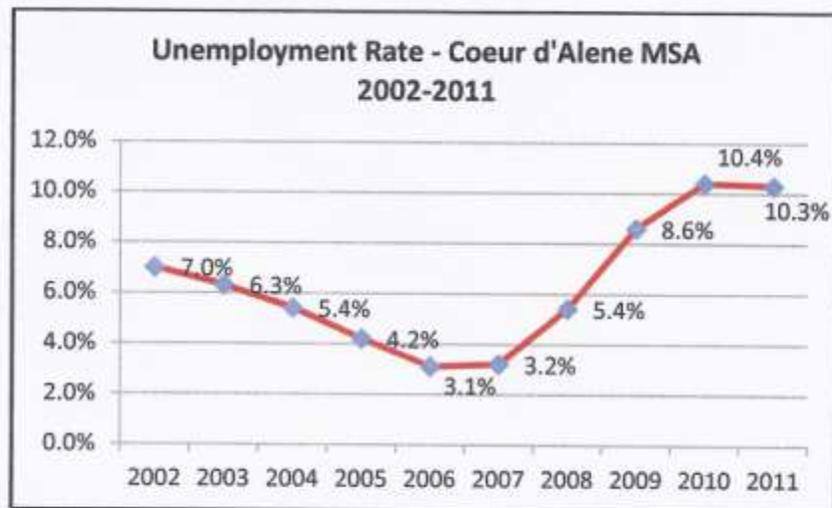


Labor Force

Total Population in the Civilian Labor Force	22,162
Civilian Employed Population 16 years and over	20,698
Unemployment Rate	6.61
Unemployment Rate for Ages 16-24	21.72
Unemployment Rate for Ages 25-65	4.35

Table 40 - Labor Force

Data Source: 2005-2009 ACS Data



Source: Idaho Department of Labor, August 2012

Occupations by Sector

Management, business and financial	6,171
Farming, fisheries and forestry occupations	133
Service	4,049
Sales and office	5,846
Construction, extraction, maintenance and repair	2,530
Production, transportation and material moving	1,969

Table 41 – Occupations by Sector

Data Source: 2005-2009 ACS Data

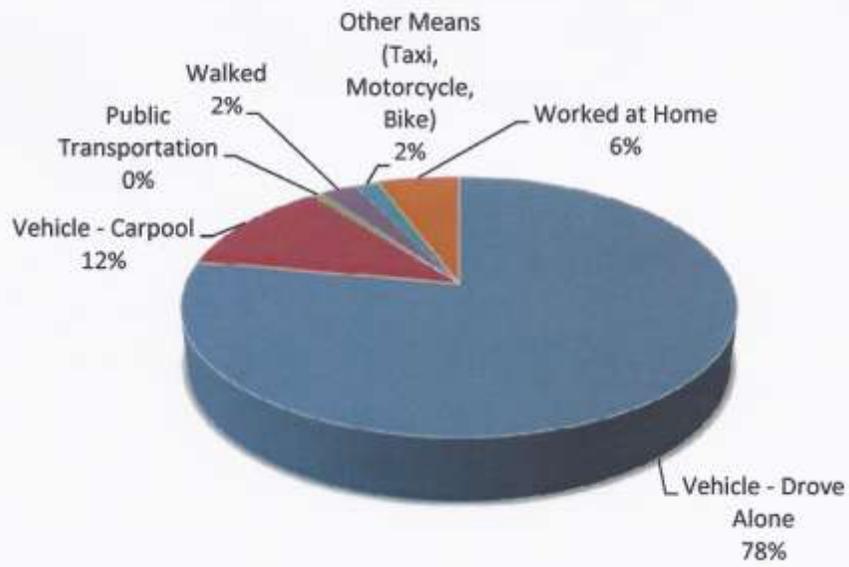
Travel Time

Travel Time	Number	Percentage
< 30 Minutes	16,106	83%
30-59 Minutes	2,479	13%
60 or More Minutes	774	4%
Total	19,359	100%

Table 42 - Travel Time

Data Source: 2005-2009 ACS Data

Mode of Transportation to Work: Coeur d'Alene



Source: 2008-2010 ACS 3-Year Estimates

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	952	42	465
High school graduate (includes equivalency)	4,178	450	1,405
Some college or Associate's degree	6,216	328	1,894
Bachelor's degree or higher	4,400	104	798

Table 43 - Educational Attainment by Employment Status

Data Source: 2005-2009 ACS Data

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	11	67	92	101	425
9th to 12th grade, no diploma	580	335	395	469	857
High school graduate, GED, or alternative	1,581	1,937	1,437	2,659	1,961
Some college, no degree	1,908	1,863	1,444	2,856	1,452
Associate's degree	388	626	645	1,016	356
Bachelor's degree	148	1,195	1,237	1,655	645
Graduate or professional degree	0	118	375	722	351

Table 44 - Educational Attainment by Age

Data Source: 2005-2009 ACS Data

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	15,565
High school graduate (includes equivalency)	21,261
Some college or Associate's degree	24,602
Bachelor's degree	33,096
Graduate or professional degree	43,611

Table 45 – Median Earnings in the Past 12 Months

Data Source: 2005-2009 ACS Data

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

The top five employment sectors in Kootenai County are Trade, Utilities & Transportation (19.7%); Government (18.6%); Hospitality (13.7%); Educational and Health Services (12.4%); and Professional and Business Services (11.5%). The number of jobs in most of the service-providing sectors either increased or remained the same during 2011, led by the addition of approximately 125 jobs (1.9%) in the leisure and hospitality sector, which has a significant effect on the local economy. Coeur d'Alene is known as a premier resort destination in the Pacific Northwest offering year-round recreational opportunities.

Describe the workforce and infrastructure needs of the business community:

The manufacturing cluster, the number six employment sector in the County at 8.3%, is one of the key employment sectors of the area as it provides great support to the overall economy, and a strong multiplier in support jobs as well as economic strength. Due to the ever expanding manufacturing sector, including computer science and aerospace industries, current economic conditions have deemed it is critical and necessary to continue to train and develop the local workforce. The Kootenai Technical Education Campus (KTEC) is a partnership with North Idaho College and the Coeur d'Alene, Rathdrum and Post Falls School Districts. KTEC serves high school juniors and seniors to give them a boost in learning basic skills to enter the local workforce.

In addition, because of the aging population and growth in retiree in-migration, the education and health services sector is expected to continue as the demand for health care services from the population that is 65 years of age and older.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create

Manufacturing businesses struggle to find persons with skills in fields of engineering, auto mechanics, fabricators, composite repair techs, machinists (machine technology), and welders. The Aerospace Industry Cluster is expanding at a rapid rate, and training is needed for airframe maintenance, composite and aircraft painting.

In September 2012 NIC received \$2.9 Million from the Idaho Department of Labor for their "Soaring to Success" Program to respond to economic and workforce development needs in northern Idaho by increasing the education and skill attainment of Trade Adjustment Assistance-eligible workers, veterans and other dislocated workers for employment in the aerospace industry. The program seeks to enroll 495 unique participants over three years into an effective series of courses that stack portable, industry-recognized credentials. North Idaho College will create an Aerospace Center of Excellence in Aviation Maintenance and Advanced Manufacturing. The two primary programs of study are aerospace manufacturing, a program that features accelerated learning and certification within 12 weeks leading to employment in manufacturing; and aviation maintenance-airframe, a 10-month Federal Aviation Administration certification program leading to employment as an airframe mechanic.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

Some underlying soft skills such as math, reading, computer skills, and work ethic are always brought up in employer meetings. It is a slow process to truly identify the needs of employers and nearly impossible to fulfill them all. With local businesses expanding, there is a gap between the skills and education of the current workforce and employment opportunities. The North Idaho College (NIC) Workforce Development continues to seek grant opportunities to add programs that will train individuals in these fields.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan

Recent initiatives include development of the Kootenai Technical Education Campus (KTEC), Education Corridor, and NIC's entrepreneur program. In addition, Panhandle Area Council, the Region's Economic Development District, houses a small business incubator for new and emerging businesses in the manufacturing industries. New initiatives include additional workforce training for associates and bachelors degrees in nursing, and also the Aerospace Industry Cluster.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

Yes

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

The Panhandle Area Council prepares the region's CEDS. Economic Development initiatives that can be coordinated with the City of Coeur d'Alene includes planning of infrastructure needs for business growth and collaboration with workforce training funds provided by the State of Idaho to meet the educational training needs of the employers.

Discussion

Creating economic opportunities through the City's CDBG program is difficult at best. The lack of funding, coupled with reductions in Federal funding of the CDBG program, result in not enough CDBG funds for a healthy economic development environment. Because of the difficulty over the past five years to achieve economic development-type projects, City staff has attended HUD Economic Development Toolkit Training to further the goal of economic development. Additionally, over the next five years, the City will research the feasibility of using CDBG funds to provide a loan program for start-up and working capital for emerging LMI entrepreneurs.

MA-50 Needs and Market Analysis Discussion

Are there any populations or households in areas or neighborhoods that are more affected by multiple housing problems?

BBC prepared the PY 2008-2012 Consolidated Plan and subsequent 2011 Analysis of Impediments to Fair Housing Choice. In both reports, there were no areas identified where households with multiple housing problems are concentrated.

Are there areas in the Jurisdiction where these populations are concentrated?

Not Applicable.

What are the characteristics of the market in these areas/neighborhoods?

Not Applicable.

Are there any community assets in these areas/neighborhoods?

Not Applicable.

Are there other strategic opportunities in any of these areas?

Not Applicable.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

This section summarizes Coeur d'Alene's community development and housing priorities, goals, and strategies for program years 2013 through 2018. The City's top housing and community development needs identified through the Consolidated Plan research process and public input include the following:

Shortage of affordable rental housing for extremely low-income renters. In the past 10 years, the distribution of rental rates in the City has shifted to include a much larger proportion of rental rates of \$500 or more. For example, in 2000, 5% of the City's rental units required rents of \$750 to \$999, compared with 26% in 2009. Overall, renters in the City expressed satisfaction with their housing situation, but also cited challenges associated with locating affordable and quality housing opportunities.

Shortage of affordable housing to buy for low-to moderate-income households. Increased home prices are not limited to the rental market. The value distribution of owner-occupied homes in the City now includes a noticeably larger proportion of homes worth \$200,000 or more, creating challenges with renters interested in homeownership. Households earning less than \$60,000 per year have difficulty finding a home they can afford. Further, homeowners in the City have not escaped the fear of foreclosure and negative equity that has defined the national housing market in the last three to four years.

Economic development that produces jobs paying a livable wage. According to the Idaho Department of Labor, jobs in the public administration, leisure and hospitality and educational and health services industries comprise just over 50% of all jobs in Kootenai County. All three industries pay modest wages, with annual earnings for full time employment falling between \$15,158 and \$39,595 annually. On average, a full-time worker in Kootenai County would expect to earn \$32,000 annually—not high enough to afford the median-valued home. Based on average wage rates by occupation, workers holding jobs in three out of the top 10 fastest-growing occupations could not afford the median rent in 2009. The City has a need for economic development that will produce higher-paying jobs, for sustainability.

Sidewalk repair. Many sidewalks in the City are chipped, cracked, and/or broken due to age of the concrete and/or tree root intrusion, posing public safety hazards. Navigation can be difficult for those with disabilities.

Public Services. General public services for the LMI population include but are not necessarily limited to activities such as substance abuse, mental health, crime reduction and awareness, and down payment assistance.

SP-10 Geographic Priorities

Geographic Area

The City of Coeur d'Alene does not have any targeted geographic neighborhood boundaries.

General Allocation Priorities: Describe the basis for allocating investments geographically within the State

All CDBG investments under Goals 3-Sidewalks and 4-Neighborhood Revitalization are geographically located in LMI Census Tract areas or individuals that income qualify as LMI. All other Goals funded under the CDBG program are targeted to 51% LMI, with the exception of the Emergency Minor Home Repair and Accessibility Program (EMRAP), which receives allocations meeting 100% LMI. The LMI Census Tracts in the City are:

- Tract 8, Block 3 – 53.8%
- Tract 9, Block 1 – 68.0%
- Tract 9, Block 3 – 55.14%
- Tract 12, Block 1 – 60.2%
- Tract 13, Block 2 – 57.1%
- Tract 14, Block 1 – 56.4%
- Tract 14, Block 2 – 51.8%
- Tract 15, Block 2 – 62.9%
- Tract 20, Block 2 – 100%

SP-25 Priority Needs

Priority Needs

Priority Need Name	Priority Level	Population	Goals Addressing
Property Acquisition for Benefit of LMI Persons	High	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Elderly	1-Increase For Sale Affordable Housing 2-Increase Affordable Rental Housing
ADA modifications to public facilities	High	Extremely Low Low Moderate Middle Persons with Physical Disabilities Non-housing Community Development	4-Neighborhood Revitalization
Emergency Shelter/Transitional Housing	High	Extremely Low Low Moderate Large Families Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Unaccompanied Youth	2-Increase Affordable Rental Housing
Parks/Recreation	Low	Extremely Low Low Moderate Non-housing Community Development	4-Neighborhood Revitalization

Water/Sewer Improvements	High	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents	1-Increase For Sale Affordable Housing 2-Increase Affordable Rental Housing 4-Neighborhood Revitalization
Sidewalk Repairs/Accessibility	High	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Non-housing Community Development	1-Increase For Sale Affordable Housing 3-Sidewalk Accessibility 4-Neighborhood Revitalization
Public Services	High	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth	6-Public Service
Substance abuse/mental health	High	Extremely Low Low Mentally Ill Chronic Substance Abuse	6-Public Service
Job Training	High	Extremely Low Low Moderate Non-housing Community Development	5-Economic Development
Crime Reduction/Awareness	High	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Non-housing Community Development	4-Neighborhood Revitalization 6-Public Service
Down Payment Assistance	High	Extremely Low Low	6-Public Service

		Moderate Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence	
Housing Rehabilitation	High	Extremely Low Low Moderate Large Families Families with Children Elderly	2-Increase Affordable Rental Housing 4-Neighborhood Revitalization
Rental Housing Rehabilitation	Low	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents	2-Increase Affordable Rental Housing
Code Enforcement	Low	Extremely Low Low Moderate Large Families Families with Children Elderly	4-Neighborhood Revitalization
LMI Business	Low	Extremely Low Low Moderate Non-housing Community Development	5-Economic Development

Table 46 – Priority Needs Summary

Narrative (Optional)

The City developed a public survey with priority needs based on the HUD CDBG eligible activities that fit within the community. This survey was available on-line through the City’s web page and also provided at each of the public forums. The above-listed priority needs are based on community input. The City believes that Goals 1-6 identified in this Consolidated Plan will adequately cover the above-stated priorities over the next five years.

SP-30 Influence of Market Conditions

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	In consultation with IHFA, the market characteristics are fluctuations in job availability, cost of rental housing, and utilities that impact funding availability. The more that is spent per person, the fewer people can be served. These characteristics are the same for the following items listed below.
TBRA for Non-Homeless Special Needs	See above.
New Unit Production	See above.
Rehabilitation	See above.
Acquisition, including preservation	See above.

Table 47 – Influence of Market Conditions

SP-35 Anticipated Resources

Introduction

The City of Coeur d'Alene does not have any anticipated resources at its disposal for the Strategic Plan, other than CDBG funding. The City hopes to have a partnership with at least one project using one of the following to leverage CDBG funds: Tax Credit, HUD 811, HUD 202, or HOME funds over the next five years.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public - Federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	243,000	0	0	243,000	1,215,000	

Table 48 - Anticipated Resources

Explain how Federal funds will leverage those additional resources (private, State and local funds), including a description of how matching requirements will be satisfied

The City of Coeur d'Alene receives no federal funding in addition to CDBG for housing and non-housing community development and there are no matching requirements for the City's CDBG program. IHFA is the Public Housing Authority (PHA) for the region and administers the Section 8 program. The estimated amount available to assist households through the Section 8 Housing Choice Voucher Program during Plan Year 2013 is \$2,056,000 in the City of Coeur d'Alene and \$2,672,000 for the region under the Project-Based Section 8 Program.

Although the City of Coeur d'Alene is not a direct recipient of any IHFA funding/grants, the projected amount of funding for the Coeur d'Alene area is approximately \$3,500,000 through Supportive Housing Program (SHP) and Emergency Shelter Grants (ESG), including Community Housing Development Organization (CHDO) funding and Homelessness Prevention and Rapid Re-housing (HPRP) grants. These funds are managed by St. Vincent de Paul as the recipient of IHFA funding for north Idaho and they have assisted over 2,050 individuals into housing with these funds within Kootenai County during 2012. The Helping Empower Local People (H.E.L.P.) Center, a one-stop-shop, in Coeur d'Alene is the focal point for outreach and service to individuals and families seeking assistance.

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

St. Vincent de Paul is leasing land owned by the City located at 102 Homestead Avenue. St. Vincent de Paul received a HUD 811 grant, and is in the process of constructing a 14-unit apartment complex. Although no CDBG funds were used for this project, it does meet the goal to increase the supply of affordable rental units.

Discussion

Additional resources from Private, State and Local funds will be leveraged as opportunities arise for the City to partner with in order to further each goal in this plan.

SP-40 Institutional Delivery Structure

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
CITY OF COEUR D'ALENE	Government	Planning	Jurisdiction
ST. VINCENT DE PAUL	Non-profit organizations	Rental	Region
ST. VINCENT DE PAUL	Non-profit organizations	Homelessness	Region
NIC WORKFORCE DEVELOPMENT	Public institution	Economic Development	Region
IHFA	Non-profit organizations	Rental	State
IHFA	Non-profit organizations	Homelessness	State
TRINITY GROUP HOMES	Non-profit organizations	Homelessness	Jurisdiction
TRINITY GROUP HOMES	Non-profit organizations	Non-homeless special needs	Jurisdiction
PANHANDLE AREA COUNCIL	Non-profit organizations	Economic Development	Region
PANHANDLE AREA COUNCIL	Non-profit organizations	Planning	Region

Table 49 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The City's system of institutional structure is strong and well-coordinated, with little duplication of services. The City will work with their selected grant administrator to address any gaps as they arise.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	
Legal Assistance	X		
Mortgage Assistance	X		
Rental Assistance	X	X	
Utilities Assistance	X		
Street Outreach Services			
Law Enforcement	X		
Mobile Clinics	X		
Other Street Outreach Services		X	
Supportive Services			
Alcohol & Drug Abuse	X		
Child Care	X		
Education	X		
Employment and Employment Training	X		
Healthcare	X		

HIV/AIDS	X		
Life Skills	X		
Mental Health Counseling	X		
Transportation	X		
Other			

Table 50 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

Services targeted to the homeless include intake, warming shelters, community kitchens and transitional housing offered through St. Vincent de Paul and local churches. Additional programs through the Community Action Partnership (CAP) include foreclosure counseling and a Community Service Block Grant that provides a range of services and activities to assist the needs of low-income individuals including the homeless, migrants and the elderly. CAP is aligned with the Idaho Hunger Relief Task Force, Idaho Food Bank, Idaho Interfaith Roundtable Against Hunger, and IHFA.

The Dirne Community Health Center provides medical care on a sliding fee scale based on household income and family size, with emphasis on the LMI and homeless populations. Types of care includes, but is not limited to, individual and family medical, medication assistance, chronic disease management, minor orthopedic injuries and lacerations, preventative care, and immunizations.

The H.E.L.P. Center, operated by St. Vincent de Paul provides office space and basic operating functions in a "one stop shop" so that LMI and homeless persons can make inquiries and receive services from employment searches to housing assistance, to basic health care with various organizations represented on site.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

The H.E.L.P. Center which is a one-stop-shop for services is the strength of the special needs populations, including homeless individuals. The gap in the service delivery system is lack of funding to support or expand services.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

The City's system of institutional structure is strong and well-coordinated, with little duplication of services. Gaps in delivery are typically a result of reduction in State and Federal funding to support Continuum of Care organizations in their ability to carry out a complete service delivery system.

The City of Coeur d'Alene plans to carry out its PY 2013-2018 Consolidated and subsequent annual Action Plans through a collaborative effort with area for-profit developers, nonprofit housing and social service providers, surrounding communities, health care agencies and the private real estate sector.

In Program Year 2013, the City plans to enter into a Contract with a private company to administer the CDBG Program, as it has for the prior 5-year period with Panhandle Area Council (PAC). PAC has a long successful history of working with State and Federal grants in managing a diverse range of projects; each requiring compliance with a multitude of grant conditions and regulations.

The services that the Contract will provide include the following:

- Develop program policies before the programs are in place;
- Accept applications from residents and certify them for the CDBG-funded EMRAP and sidewalk repair and replacement programs;
- Certify the completion of CDBG-funded EMRAP and sidewalk repair and replacement programs;
- Provide reports to the City documenting the use of CDBG funds for the programs;
- Prepare the City's annual Action Plan; and
- Prepare the City's annual CAPER.

City staff will process fund requests and issue payments to residents participating in the programs and create program policies.

The City will continue to implement incentives to private and nonprofit developers for creation of affordable and workforce housing, as outlined in Goal 1 of the Strategic Plan. Further, the City will research the viability with economic development and education partners for a low-interest loan program for LMI entrepreneurs.

SP-45 Goals Summary

Goals Summary Information

Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Goal Outcome Indicator
1-Increase For Sale Affordable Housing	2013	2018	Affordable Housing	N/A	Property Acquisition for Benefit of LMI Persons Water/Sewer Improvements Sidewalk Repairs/Accessibility	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 2 Households Assisted
2-Increase Affordable Rental Housing	2013	2018	Affordable Housing Homeless Non-Homeless Special Needs	N/A	Property Acquisition for Benefit of LMI Persons Emergency Shelter/Transitional Housing Water/Sewer Improvements Housing Rehabilitation Rental Housing Rehabilitation	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 20 Households Assisted
3-Sidewalk Accessibility	2013	2018	Non-Housing Community Development	N/A	Sidewalk Repairs/Accessibility	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1000 Persons Assisted
4-Neighborhood Revitalization	2013	2018	Non-Housing Community Development	N/A	ADA modifications to public facilities Parks/Recreation Water/Sewer Improvements Sidewalk Repairs/Accessibility Crime Reduction/Awareness Housing Rehabilitation Code Enforcement	Homeowner Housing Rehabilitated: 30 Household Housing Unit
5-Economic Development	2013	2018	Non-Homeless Special Needs	N/A	Job Training LMI Business	Businesses assisted: 1 Businesses Assisted
6-Public Service	2013	2018	Non-Homeless Special Needs	N/A	Public Services Substance abuse/mental health Crime Reduction/Awareness Down Payment Assistance	Public service activities for Low/Moderate Income Housing Benefit: 25 Households Assisted

Table 51 – Goals Summary

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

Not Applicable. The City does not provide HOME funding.

SP-50 Public Housing Accessibility and Involvement

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

There is no public housing in the City of Coeur d'Alene. The City recognizes that agencies, such as IHFA, who has been acting as the public housing authority for the region for many years, has 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.

Activities to Increase Resident Involvements

The City of Coeur d'Alene receives no Federal funding in addition to CDBG for housing. Activities to increase resident involvement through the Section 8 program are managed by IHFA.

Is the public housing agency designated as troubled under 24 CFR part 902?

N/A

Plan to remove the 'troubled' designation

Not applicable; there is no public housing agency in Coeur d'Alene.

SP-55 Barriers to affordable housing

Barriers to Affordable Housing

A zoning, land use, and housing policy review was completed in conjunction with a statewide Analysis of Impediments to Fair Housing in 2011. 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. A few important differences of the City from the County's housing barrier analysis include the following:

- The City allows for 300 SF accessory dwelling units (ADU) in all 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 induce workforce housing development. Four square feet of floor area is allowed for each square foot of workforce housing provided within 1.5 miles of the project site and within City limits.
- The County's minimum lot size of 3,000 square feet was among the lowest reviewed in the State. Coeur d'Alene accommodates pocket residential in the R-8, R-12, and R-17 residential districts, as well as the C-17L and C-17 commercial districts. Pocket residential has no lot size and setback minimums on the site, but overall density is set by the zoning.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The 2011 Analysis of Impediments to Fair Housing Choice identifies the following Action Items, Impediments Addressed and Actions for the City of Coeur d'Alene:

FHAP Action Items:

- Increase resident awareness of Fair Housing Laws and the complaint process.
- Continue to educate developers, property owners, landlords, and HOAs about ADA and Fair Housing Laws.
- Increase internal knowledge and resources about Fair Housing Law.
- Continue to improve sidewalks and parking for persons with physical disabilities.
- Address housing needs of racial and ethnic groups.

Impediments Addressed:

- Citizens could be better informed about Fair Housing issues.
- Landlords, developers, and HOAs would benefit from more education about Fair Housing Laws and ADA.
- Lack of accessible sidewalks.
- Lack of accessible parking downtown.

Activities:

- Continue annual sponsorship of the free fair housing training, open to the general public.
- Continue to provide valuable housing links on City website.
- Continue to provide an annual Fair Housing Month Proclamation.
- Continue to utilize the local PEG channel to air fair housing commercials and educational PSAs.
- Work with other agencies to assemble an information brochure to hand out at meetings and other venues.
- Continue its sidewalk enhancement projects and ADA sidewalk improvements annually.
- Have the Parking Commission review the downtown parking and make recommendations. The City is currently master planning the main City parking lot, which serves the downtown area.
- Continue efforts to construct affordable housing in the City, as identified in Goals 1 and 2.

SP-60 Homelessness Strategy

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

Many of the activities to assist homeless persons in Coeur d'Alene and Kootenai County are delivered through an assortment of well-established programs under the direction of organizations and agencies such as St. Vincent de Paul, IHFA and the Disability Action Center.

The City of Coeur d'Alene attends the Region I Homeless Coalition on a regular basis to foster a communication network with these agencies and to remain informed regarding local and regional programs. The City provides support as appropriate and practical, including web postings, information on the local broadcast station, distribution of printed materials, consultations and other aid as requested.

Homelessness is a chronic problem and may never be totally eliminated. Some barriers to ending homelessness such as poor and non-existent housing stock and lack of jobs can be addressed by local governments and agencies, however, correcting those problems are not quick or easy fixes. Plans and programs can provide resources, encouragement, and even a system of rewards or punishments, but no one solution will work for everyone.

Addressing the emergency and transitional housing needs of homeless persons

There are several organizations in Coeur d'Alene that address emergency shelter and transitional housing needs. The City continues to coordinate with these organizations to develop a strong system to meet the needs of homeless persons.

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.

Barriers created or exacerbated by the homeless are varied, as are the methods to mitigate those barriers. Lack of education, job training and financial management skills can be improved through government-funded programs. However, the success of those efforts is unpredictable and not always permanent as it requires a level of commitment by the homeless individual.

Coeur d'Alene School District #271 has identified over 290 students that have been determined to be homeless during the 2011-2012 school year. There are 3,599 students that receive free lunch, with another 948 participating in the reduced lunch program. The School District has taken steps to assist families in need; working toward removing barriers to education caused by homelessness and poverty. Barriers involving health and mental health issues require different and often more expensive resources, and a greater commitment to change by the homeless person. With more resources being cut from

State and Federal budgets, it is increasingly more difficult for local service organizations to continue to serve the homeless population.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

The City and other partners in the *Ten Year Plan to End Homelessness* will concentrate their efforts on helping as many persons as possible, using all resources at their disposal. The following approaches are identified in the *Ten Year Plan to End Homelessness*:

- Develop better data collection and coordination of agency efforts
- Identify and increase the inventory of available affordable housing stock
- Improve economic development opportunities and coordinate the response among local governments
- Deploy the Housing First model for Permanent Supportive Housing
- 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
- Increase community awareness to draw new and concerned voices to the table to help win the battle against homelessness.

SP-65 Lead based paint Hazards

Actions to address LBP hazards and increase access to housing without LBP hazards

Lead based paint is most commonly found on windows, trim, doors, railings, columns, porches, and exterior walls, can be found in buildings that were built before 1960 but was phased out of homes by 1978. Generally speaking, the older the home, the more likely it is to have lead-based paint. Children are the most susceptible to lead poisoning as they often put their hands and other objects into their mouth which may have lead on them. The Idaho Department of Health and Welfare reports that growing bodies absorb more lead, their brains and nervous systems are more sensitive to the damaging effects of lead. Lead in children can cause behavioral and learning problems, slowed growth, hearing problems, headaches and damage to the brain and central nervous system. Exposure to lead is even more dangerous for unborn babies. Adults exposed to lead can suffer from reproductive problems, high blood pressure, digestive disorders, muscle and joint pain, memory and concentration problems, and nerve disorders.

The National standards for blood lead levels are:

- 0 to 10 ug/dL: Normal
- 10 to 20 ug/dL: Elevated
- 20 to 40 ug/dL: High
- 40 to 70 ug/dL: Very High
- Over 70 ug/dL: Medical Emergency

In Coeur d'Alene, nearly half (45%) of owner-occupied and renter-occupied housing units were built before 1980, with 20% of these built before 1970. The Panhandle Health District keeps track of the number of persons where testing for blood lead levels exceed 10 ug/dL. Data obtained from the Panhandle Health District states that there are 40 reported lead poisoning cases in Kootenai County for the period 2008-2012. Of these, nearly 28% (11) cases are in the City of Coeur d'Alene.

Since HUD issued a new regulation to protect young children from lead-based paint hazards, the City of Coeur d'Alene has been taking steps to insure its regulations are in compliance, which includes revising program procedures and performing lead hazard reduction when necessary by level of CDBG funding.

How are the actions listed above related to the extent of lead poisoning and hazards?

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 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 contracts working on EMRAP projects. The City's grant administrator consultant also attended a HUD sponsored lead-based paint training to become more familiar with the requirements and their implementation.

How are the actions listed above integrated into housing policies and procedures?

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 Emergency Minor Home Repair and Accessibility Program (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.

SP-70 Anti-Poverty Strategy

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The ultimate goals of the City's anti-poverty efforts described below are to assure that families are provided with safe places to live, food and clothing, adequate transportation, jobs skills, parenting classes, high school completion programs, health care and education, and opportunities to participate as functional members of community.

Support economic development efforts. Currently, Coeur d'Alene is experiencing record-setting high unemployment rates (9.2% as of August 2012). The City recognizes that availability of jobs that pay a living wage can be a large factor in preventing and reducing poverty. The City will continue to work with Jobs Plus to encourage businesses to locate within the City limits.

Promote workforce development. Education and training are important components of achieving long-term success in the work world; therefore, a key strategy must be to invest in education and training, particularly those programs that motivate and assist low-income individuals and families to pursue education and training opportunities while they are already working in low-wage jobs. Local colleges have recently created an "education corridor" which will allow the colleges to grow and provide more educational opportunities, as well as create jobs.

Provide services to at-risk youth. Working families often find affordable child care is difficult to access. The City will continue to seek the best child care regulations and encourage growth in this industry throughout the community. The Salvation Army Kroc Center is providing many youth programs, and the City will continue to work with the Salvation Army to coordinate appropriate and needed activities and encourage at-risk youth to attend the activities. In addition, the City's local Head Start agency provides an enhanced early childhood education curriculum that focuses on school readiness skills. Coeur d'Alene School District #271 continues to provide "CDA for Kids," an after school program, and participates in the McKinney-Vento Homeless Education Act. The School District also has strategies to end homelessness for children that include finding resources, financial literacy program and provide materials. The City agrees that education, especially at the earliest level, is important to eliminating the cycle of poverty and will continue to support Head Start.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

As with all of the listed goals, programs and policies in this Plan, the City continues to coordinate with all jurisdictional, regional and statewide organizations and agencies through a regular communication process.

SP-80 Monitoring

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

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. Panhandle Area Council, as Administrators under the City of Coeur d'Alene's CDBG Entitlement Program, has 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.

1) Pre-Assessment. During the application process, sub-recipients will be evaluated on the capacity of the organization to complete the project as described and will be scored appropriately.

2) Desk Monitoring. Monitoring will be an ongoing process for the City of Coeur d'Alene. A review of the sub-recipient's progress and capacity will be conducted at all stages of the contract. The formal stages of the contract will include draw requests, quarterly reports and closeout. At the end of the contract year, City CDBG staff will comply with all client demographic data reported by the CDBG sub-recipients on their quarterly reports that will become part of the annual CAPER.

3) Risk Analysis. Each program year, sub-recipients are identified that should be monitored.

3) On-Site Monitoring. In addition to desk monitoring, City CDBG staff will conduct a minimum of two on-site monitoring reviews each year. These site visits review sub-recipients' records for program and/or financial compliance. A checklist will be used at these site visits.

4) Ongoing Technical Assistance. The monitoring process will be further enhanced by regular contact between the CDBG grant staff and the CDBG sub-recipients. Constant communication and technical assistance will be offered at all stages of the program from application to close-out to ensure compliance with appropriate regulations. Additionally, CDBG grant staff will remain in contact with other City officials to facilitate any permitting and inspections necessary for any building or construction activities.

ACTION PLAN

Expected Resources

AP-15 Expected Resources

Introduction

The City of Coeur d'Alene does not have any anticipated resources at its disposal for the Strategic Plan, other than CDBG funding. The City hopes to have a partnership with at least one project using one of the following to leverage CDBG funds: Tax Credit, HUD 811, HUD 202 or HOME funds, over the next five years.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	243,000	0	0	243,000	1,215,000	

Table 1 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The City of Coeur d'Alene receives no federal funding in addition to CDBG for housing and non-housing community development and there are no matching requirements for the City's CDBG program. IHFA is the Public Housing Authority (PHA) for the region and administers the Section 8 program. The estimated amount available to assist households through the Section 8 Housing Choice Voucher Program during Plan Year 2013 is \$2,056,000 in the City of Coeur d'Alene and \$2,672,000 for the region under the Project-Based Section 8 Program.

Although the City of Coeur d'Alene is not a direct recipient of any IHFA funding/grants, the projected amount of funding for the Coeur d'Alene area is approximately \$3,500,000 through Supportive Housing Program (SHP) and Emergency Shelter Grants (ESG), including Community Housing Development

Organization (CHDO) funding and Homelessness Prevention and Rapid Re-housing (HPRP) grants. These funds are managed by St. Vincent de Paul as the recipient of IHFA funding for north Idaho and they have assisted over 2,050 individuals into housing with these funds within Kootenai County during 2012. The Helping Empower Local People (H.E.L.P.) Center, a one-stop-shop, in Coeur d'Alene is the focal point for outreach and service to individuals and families seeking assistance.

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

St. Vincent de Paul is leasing land owned by the City located at 102 Homestead Avenue. They received a HUD 811 grant, and are in the process of constructing a 14-unit apartment complex on the property. Although no CDBG funds were used for this project, it does meet the goal to increase the supply of affordable rental units.

Discussion

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

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1-Increase For Sale Affordable Housing	2013	2018	Affordable Housing	N/A	Water/Sewer Improvements	CDBG: \$0	Homeowner Housing Added: 1 Household Housing Unit
2-Increase Affordable Rental Housing	2013	2018	Affordable Housing Homeless Non-Homeless Special Needs	N/A	Property Acquisition for Benefit of LMI Persons	CDBG: \$106,833	Preservation of LMI Rental Units: 7 Housing Units
3-Sidewalk Accessibility	2013	2018	Non-Housing Community Development	N/A	ADA modifications to public facilities Sidewalk Repairs/Accessibility	CDBG: \$25,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 333 Persons Assisted
4- Neighborhood Revitalization	2013	2018	Non-Housing Community Development	N/A	Water/Sewer Improvements Sidewalk Repairs/Accessibility Housing Rehabilitation	CDBG: \$40,000	Homeowner Housing Rehabilitated: 8 Household Housing Unit
5-Economic Development	2013	2018	Non-Homeless Special Needs	N/A	Job Training LMI Business	CDBG: \$0	Jobs created/retained: 0 Businesses assisted: 0
6-Public Service	2013	2018	Non-Homeless Special Needs	N/A	Public Services	CDBG: \$22,567	Public service activities other than Low/Moderate Income Housing Benefit: 1 Persons Assisted

Table 2 – Goals Summary

Projects

AP-38 Project Summary

Project Summary Information

Project Name	Target Area	Goals Supported	Needs Addressed	Funding
Emergency Minor Home Repair & Accessibility Improvements Program (EMRAP)	N/A	4-Neighborhood Revitalization	Water/Sewer Improvements Sidewalk Repairs/Accessibility Housing Rehabilitation	CDBG: \$40,000
Increase Affordable Rental Housing	N/A	2-Increase Affordable Rental Housing	Property Acquisition for Benefit of LMI Persons	CDBG: \$106,833
Sidewalk Accessibility	N/A	3-Sidewalk Accessibility	ADA modifications to public facilities Sidewalk Repairs/Accessibility	CDBG: \$25,000
Public Services	N/A	6-Public Service	Public Services	CDBG: \$22,567
General Administration	N/A			CDBG: \$48,600

Table 3 – Project Summary

AP-35 Projects

Introduction

Plan year 2013 will bring the conclusion of three separate long-term projects allowing for accomplishment data to be entered. The first project, Habitat for Humanity, began in PY2009 and has been steadily progressing with expectations of the fourth and final home being completed and available for purchase by an LMI person. The second project, 106 Homestead Avenue property acquisition for the preservation of 7 units of rental housing for LMI persons, began in PY2010 and the City of Coeur d'Alene has been slowly reimbursing itself for fronting the costs. The final payment will be made with 2013 funds. The third project is the second phase of a two-year project for sidewalk repairs along Harrison Avenue to bring the sidewalks into ADA conformance within two LMI census tracts.

The City of Coeur d'Alene also anticipates the launch of a new project: the Public Service grant opportunity. Similar projects, the Community Grant Opportunity, has allowed for a variety of eligible proposals whereas the Public Service grant is being reserved specifically for addressing gaps within our local Continuum of Care. This program is subject to a cap of 15% of the annual allocation of HUD funds but the City is eager to provide a much needed service to City residents. City residents will also benefit from the EMRAP program's continuation this year due to popular demand.

#	Project Name
1	Increase Affordable Rental Housing
2	Emergency Minor Home Repair & Accessibility Improvements Program (EMRAP)
3	Sidewalk Accessibility
4	Public Services
5	General Administration

Table 4 – Project Information

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

The City's planning for allocation priorities is focused toward the number of persons who can be helped and identifying projects that will produce the best benefit for the investment. One of the larger budget items (44%) for Plan Year 2013 is the final payment on property acquisition to benefit future LMI rental housing (specifically the 7-unit apartment complex at 106 Homestead Avenue) by preserving existing LMI usage. The large allocation coincides with the project's number one priority status. The City's Emergency Minor Home Repair & Accessibility Program (EMRAP) (16.5%) is available to homeowners within the City limits who meet the income eligibility and program requirements. This program occurs throughout the community, as it is not a geographically based program. The EMRAP program has been very successful in the past five years and continued project funding is frequently requested in public forums. More applications are received than can be funded every year. The funding for Public Services (9.3%) is part of a competitive and/or informal process; appropriate projects may be located anywhere as long as the beneficiaries are LMI residents of Coeur d'Alene. No specific projects have been identified to date. However, the City anticipates receiving plenty of applications for a responsible and effective grant project when Request for Proposals are made available to the public. Due to reduced federal funding the public service project will be limited to one project in 2013 in order to produce the best benefit for the investment. Funding for sidewalks has been determined to be best addressed with a

two-year planning approach. The first year involves identification of projects and partial allocation and the second year involves the actual construction activity and the final allocation. This year involves the second year activities (10.2%) for a project on Harrison Avenue and is an area wide benefit for LMI census tracts, facilitating ADA conformance among many other benefits. The proposed budget allocates 80% of all funds to be utilized to benefit LMI. The average over the past five years has been 82% of funding used for LMI benefit, due to the remaining funds being used for administration.

The City based the budget and allocations on the best information available at the time this document was created. It is unknown if HUD will allocate slightly more or less than the estimated amount. If more or less funds are allocated, it is the City's plan that additional dollars or deletion of dollars will be added or removed from either Public Services or EMRAP, or some from both.

AP-50 Geographic Distribution

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

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

The City of Coeur d'Alene does not have significant, dense areas of low-income residents nor are there areas of racial/minority concentration; the total minority population (2000 census) is less than 5%. The City of Coeur d'Alene does use Census Tract mapping when conducting planning activities for projects under the CDBG Entitlement program (for example sidewalk repair/replacement).

Geographic Distribution

Target Area	Percentage of Funds
N/A	0

Table 5 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City's planning is focused more toward the number of persons who can be helped, and identifying projects that will produce the best benefit for the investment.

Discussion

Not applicable.

Affordable Housing

AP-55 Affordable Housing

Introduction

Affordable housing programs available to Coeur d'Alene residents include the Low Income Housing Tax Credit (LIHTC) program, the HOME program, the Project-Based Section 8 program, and the Section 8 Housing Choice Voucher program. Combining the LIHTC, HOME, and Project-Based Section 8 programs, there are 869 family units, 461 elderly units, and 175 handicapped accessible units in Coeur d'Alene offering subsidized rental housing.

As of January 2011, there were 12 LIHTC and HOME developments in Coeur d'Alene. These developments had 554 family units, 145 units for seniors, and 108 were accessible to persons with disabilities.

Since 2007, CDBG funds were leveraged to construct four rental units with HUD 811 grants. Although no CDBG funds were used, through a lease of City-owned land, the City supported 37 units of HUD 202 units and fourteen units of HUD 811 units (currently under construction). CDBG funds also leveraged IHFA tax credit allocations for an additional 77 affordable units in the City of Coeur d'Alene.

One Year Goals for the Number of Households to be Supported:	
Homeless	0
Non-Homeless	19
Special-Needs	0
Total	19

Table 6 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through:	
Rental Assistance	0
The Production of New Units	4
Rehab of Existing Units	8
Acquisition of Existing Units	7
Total	19

Table 7 - One Year Goals for Affordable Housing by Support Type

Discussion

Habitat for Humanity of North Idaho used CDBG funds for constructing infrastructure to support a four-unit housing development in mid-town Coeur d'Alene. The first of the housing units were occupied during the 2010 calendar year, the second in 2011, and the third in 2012. The construction schedule will be influenced by Habitat's regulations and volunteer availability. One more home will be constructed for low-income individuals to eventually purchase with the final unit expected to be completed in 2013. Providing homes for purchase by low/moderate income persons is a goal of the City, but one that takes more time and resources than other City goals.

The City is also partnering with St. Vincent de Paul, by leasing the property at 106 Homestead Avenue, containing 7 LMI rental units as a tax credit property. Additionally, St. Vincent de Paul is leasing land owned by the City located at 102 Homestead Avenue. St. Vincent de Paul received a HUD 811 grant, and is in the process of constructing a 14-unit apartment complex. Although no CDBG funds were used for this project, it does meet the goal to increase the supply of affordable rental units.

AP-60 Public Housing

Introduction

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

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

IHFA serves the housing needs of the Idaho Panhandle, including the City of Coeur d'Alene. IHFA has an established system for providing service, which is well received within the region.

IHFA administers the Section 8 program in the City of Coeur d'Alene. During 2012 IHFA put \$2,672,075 into Region One for project-based Section 8 activities assisting 497 families. The Section 8 Housing Choice Voucher program provided \$2,056,726 in vouchers to 267 families in the City of Coeur d'Alene. The estimated amount available to assist households during Plan Year 2013 is based on 2012 figures and projected to be approximately the same.

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

The City of Coeur d'Alene agreed to have the North Idaho Housing Coalition (NIHC) administer the Neighborhood Stabilization (NSP) funds. NIHC works in Kootenai County. Of the 56 families assisted since 2009, 12 have been City residents. The City of Coeur d'Alene strongly supports NIHC's goal to help provide affordable and workforce housing.

NIHC works with families that are LMI; approximately 30% of the total families assisted are at 50% of the median and below and 80% of the total families assisted are at 120% of the median and below. NIHC spent \$5,770,738 through 2011 in NSP funding throughout the Kootenai County area. An additional, \$2,300,000 was used in 2012 and another \$2,000,000 is anticipated for 2013.

Through the use of the NSP funding, NIHC works to acquire foreclosed homes and rehabilitates them as needed. The homes are then marketed to potential buyers that meet the NSP qualifications. NIHC assists qualified buyers with closing costs and mortgage reductions, based on need. Buyers obtain a mortgage loan through the lender of their choice and sale proceeds are returned to the NSP program managed by IHFA.

NIHC requires participants to contribute a minimum of \$500 toward the housing purchase and to participate in credit counseling if needed. Participants also contribute to the community by donations of time through the Deeds of Distinction program. Several local non-profits have benefitted from over 400 hours of service, such as the Food Bank, St. Vincent de Paul, Family Promise, United Way, Special Olympics and numerous churches and schools.

NIHC also received a \$1,600,000 HOME grant in August 2012 to assist families with incomes at or below 80% of the area median income in purchasing a home. This program is similar to the NSP program (purchase, rehabilitation, and reselling) but is not limited to foreclosed properties.

The City has a council member acting as a liaison who attends meetings with NIHC and will concentrate on identifying new avenues for partnerships to expand on accomplishments to date in Plan Year 2013. NIHC is currently conducting a Housing Needs Assessment to further define the housing needs of LMI families and individuals. NIHC anticipates helping eight families further their goals with HOME funds and approximately ten more families will be assisted in 2013 with NSP funds.

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

The PHA has not been designated as troubled, and the City feels it would be redundant, expensive, and inefficient for the City of Coeur d'Alene 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.

Discussion

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

AP-65 Homeless and Other Special Needs Activities

Introduction

The City receives no funding beyond their CDBG Entitlement for the homelessness activities. St. Vincent de Paul distributes McKinney-Vento funding through the SHP, ESG, and S+C. During 2012 approximately \$1,200,000 was used to provide 82 different types of services to 2,069 (unduplicated) individuals, including clothing, food, utility, rental assistance, and vouchers.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The City's 10-Year Plan to End Homelessness estimates that in 2012 there are 427 homeless individuals on the street, in shelters, and transitional housing. In January 2013 a new Point-in-Time Count of area homeless individuals will be conducted to update of understanding of the current situation. Aggregate statistics are collected for Kootenai County, not just Coeur d'Alene, but Coeur d'Alene is part of the coordination for this effort. Over \$5.5 million in services is already being provided in Coeur d'Alene and the surrounding community. Approximately 17,000 points of service were provided to the homeless, including warming shelters, which open when the temperature falls below 25 degrees. Housing First, administered by St. Vincent de Paul, is a model that has been promoted by the federal government and used as funding allows.

Currently, the 10-Year Plan to End Homelessness Committee is working toward focusing on one identified area per year to increase understanding and results in specific efforts. The one-stop-shop concept of the H.E.L.P. Center became reality in 2008 and continues to assist a majority of the people in need throughout the county.

Homelessness is a chronic problem and may never be totally eliminated. Some barriers to ending homelessness such as poor and non-existent housing stock and lack of jobs can be addressed by local governments, though correcting these problems are not quick, easy, or inexpensive fixes.

Barriers created or exacerbated by the homeless individuals are varied, as are the methods to mitigate those barriers. Lack of education, job training, and financial management skills can be provided through government-funded programs; the success of those efforts is unpredictable and not always permanent, and depends on a certain level of commitment by the homeless individual. Barriers involving health and mental health issues require different, and often more expensive resources, and a greater commitment to change by the homeless person.

Plans and programs can provide resources, encouragement, even a system of rewards or punishments, but no one solution will work for everyone. The City and other partners in the Plan to End Homelessness will concentrate their efforts on helping as many persons as possible, using all resources at their disposal.

The City's 10-Year Plan to End Homelessness will be a living document; implementation and periodic reviews of the Plan are vital to the success of the plan. The City and partner agencies intend to work

with and include citizens that are homeless and/or have been homeless to find and address gaps in the system.

The full plan is available on the City's website at:

http://www.cdaid.org/mod/userpage/images/city_10_year_homeless_plan.pdf

Addressing the emergency shelter and transitional housing needs of homeless persons

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

For persons experiencing homelessness and women who are domestic violence victims, there are six emergency shelters in the County to assist them: Children's Village, St. Vincent de Paul Women's Shelter, St. Vincent de Paul Men's Shelter, St. Pius Church, 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 to 68 people in need of housing because they are homeless.

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

Fresh Start provides a drop-in facility for the homeless and mentally ill to clean up and receive clothes and food. They also offer computers with internet connection to facilitate job searches and communication with family and other support systems. A mail drop address is provided to further the communication support services they offer. Fresh Start stays open all night, beginning at 7:00 p.m., when the temperatures are expected to drop below 25 degrees and a free medical clinic, Dirne Community Health Center, is available every Thursday morning and some Saturdays.

Union Gospel Mission is a faith-based organization out of Spokane, Washington that has recently expanded across state lines. They offer a long-term residential recovery center for women with children and women with substance abuse problems. It is located in mid-town Coeur d'Alene and the City granted a special use permit to change from a residential zoning to better facilitate their expansion. Short-term emergency help is also available on a limited basis. Food, shelter, clothing, one-on-one and group therapy sessions, life-skills classes, and a medical clinic are some of the resources they offer.

Under a HPRP grant, St. Vincent de Paul has been tracking accomplishment in two categories: homeless prevention and rapid re-housing. Under the homeless prevention program 122 have been served; and under the rapid re-housing program 141 individuals have been served from April 2011 through March 2012. Additionally, St. Vincent de Paul operates a homeless family shelter under an Angel Arms grant they received providing funding for ten single unit apartments for chronically homeless individuals. The program also provides intensive weekly case management, which begins with self-sufficiency plan that includes job training services, substance about counseling, Life Skills classes, parenting classes, and financial literacy classes.

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 City'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 focus areas of the City's efforts: (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.

The City will continue to support the efforts of local service providers and the School District through its 10-Year Plan to End Homelessness.

The Coeur d'Alene School District #271 has identified over 276 homeless children and has taken steps to assist families in working with existing community resources and state resource service providers. 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 the child's ability to function in the educational environment.

The School District is continually working toward removing barriers to education caused by homelessness and 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).
- 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.
- Continue to train District staff regarding the needs of homeless students. Strategies: Provide training materials and contact information.

St. Vincent de Paul operates a number of programs aimed at the transition to permanent housing and independent living such as the Fashions for your Future program that helps those looking for work to look their best. Youth are supported with programs such as Art on the Edge, an after-school program filled with public art projects and festivals teaching youth to use art as a tool for problem-solving, goal setting, self esteem and community values. Project Safe Place works directly with at-risk-youth and run-away prevention.

An Americorp volunteer has been placed at the local Department of Labor to assist veteran's with filling out applications for jobs, college, and scholarships. The volunteer also serves as a resource to connect veterans with services. The 106 Homestead Avenue CDBG project currently houses veterans while also being open to all LMI persons upon vacancy.

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

The City does not currently have a discharge policy or have direct responsibility for discharge planning and protocols for persons leaving publicly funded institutions or health care systems. These responsibilities are handled at the State level directly through the Department of Corrections and Health and Welfare for persons still enrolled in their systems as they are required to find suitable housing before discharge.

Discussion

The Region 1 Coalition for the Homeless (Continuum of Care) and their associated network is always looking to provide those in need with housing, regardless of their history, and ways to add “beds” to the community. The City attends these monthly meetings and works to find partnerships to leverage additional project funding to further the goals under the 10-Year Plan to End Homelessness.

As stated in the PY 2013-2018 Consolidated Plan under the Non-Homeless Special Needs Assessment, there is a myriad of supportive services in the community managed by other organizations for the non-homeless special needs populations. Goal 6-Public Service was included in the City’s Consolidated Plan. One of the opportunities under this goal is to partner with organizations that serve the non-homeless special needs populations in the community. As projects arise, it is possible that the City can leverage funding to better serve these individuals and families.

AP-75 Barriers to affordable housing

Introduction

As discussed in AP-55: Affordable Housing, there are affordable housing units within the city limits, but like the majority of cities, more affordable housing could always be used. The City of Coeur d'Alene encourages and supports affordable housing by looking for partnerships to add to the stock and intends to continue utilizing methods similar to those already used in the past where CDBG funds are leveraged to produce the best benefit for the investment. An example of this method is evidenced by projects such as the partnership with Whitewater Development for the Riverstone Apartments where \$10,000 was used for architecture and engineering costs was leveraged to produce a \$6,350,000 facility with 38 out of 50 rental units reserved for LMI persons.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

In 2011 an Analysis of Impediments to Fair Housing Choice (AI) included discussions on land use controls, zoning ordinances, building codes, and fees and charges. While this report is focused on fair housing it also provides valuable insight into affordable housing and the general housing climate in the City of Coeur d'Alene. The flexibility in the laws and awareness of housing issues by the leadership positions of the City assists in making the City both a desirable place to have and build affordable housing. The 2011 AI identifies no barriers in the community due to the above listed issues. The City has an even disbursement of residential, commercial, and industrial zoning with many areas of mixed use facilitating affordable housing near areas that offer jobs for the residents. Minimum lot sizes are among the lowest in the state, pocket residential has no lot size or setback minimums, and accessory dwelling units are allowed in all zoning districts with no special permits required; these are all identified as favorable conditions compared to industry accepted barriers.

Investigation into tax policies, growth limitations, and policies affecting the return on investment also reveal no significant barriers. In fact, the City has an incentive program called the Density Bonus Incentive which allows downtown projects to use a larger footprint of the parcel than current code generally allows as long as new workforce housing is built as part of the project. The workforce housing can be located on the same site or somewhere within the downtown core and its immediate surrounding district.

Discussion

The City has realized additional affordable rental housing through the purchase of 106 Homestead Avenue which is a 7-unit property and the expected construction of a HUD 811 on the neighboring property under a long-term lease to St. Vincent de Paul as a tax credit property.

Other major barriers facing households and individuals trying to obtain homeownership are the high unemployment rate and limitations regarding home loans for low/moderate income persons. The City has an excellent record of working with local organizations such as 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 (e.g., professors, service workers, and building maintenance staff).

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.

AP-85 Other Actions

Introduction

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

Actions planned to address obstacles to meeting underserved needs

The City will continue to work with local organizations such as St. Vincent de Paul, NIHC, the Committee to End Homelessness, IHFA, the Continuum of Care Coalition, 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. Center is an excellent start to this process. The 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 from employment searches to housing assistance to basic health care. The obstacles to meeting underserved needs are as varied as the individuals who seek assistance. As organizations and agencies record program activities including successes and failures, adjustments are made to the process, to incorporate the most effective methodologies and modify or eliminate those that are not working. The process is ongoing and as flexible (within the confines of established regulations) as possible to address the conditions and circumstances adherent to Coeur d'Alene.

Additionally, the City will continue to advocate to the community, the need for warming shelters and Project Homeless Connect.

Actions planned to foster and maintain affordable housing

Plan year 2013 will bring the conclusion of the 106 Homestead Avenue property acquisition for the preservation of 7 units of rental housing for LMI persons. This project began in PY2010 and the City of Coeur d'Alene has been slowly reimbursing itself for fronting the costs. The City encourages and supports affordable housing by looking for partnerships to add to the affordable housing stock and intends to continue utilizing methods similar to those already used in the past where CDBG funds are leveraged produce the best benefit for the investment. An example of this method is evidenced by projects such as the partnership with Whitewater Development for the Riverstone Apartments where \$10,000 was used for architecture and engineering costs was leveraged to produce a \$6,350,000 facility with 38 out of 50 rental units reserved for LMI persons.

Actions planned to reduce lead-based paint hazards

The City distributes lead hazard information pamphlets to any residents seeking information and with each application for the Emergency Minor Home Repair and Accessibility Improvement Program (EMRAP). The pamphlets are also available on the City's web page and within the customer service center where building permits are issued. Additionally, the City provided pamphlets and information to the local building contractors association. Starting in April 2010, all for-hire construction work in child-occupied facilities must comply with the EPA Renovator, Repair, and Painting (RRP) law. The RRP law

requires that any person doing this work get RRP certification and perform additional recordkeeping and site cleanup. In October 2010, the City sponsored RRP training. Of the 23 individuals who received certification, some were contractors that have and will work on EMRAP projects.

Actions planned to reduce the number of poverty-level families

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

The City has committed to a number of strategies to help reduce poverty including partnerships with organizations such as Jobs Plus for job creation and Lake City Development Corporation for economic development to provide better opportunities within the community. Also, there have been improvements to infrastructure including sidewalk repair/replacement in LMI neighborhoods to revitalize them which assists in alleviating burdens allowing people to focus their efforts elsewhere.

The City promotes workforce development and has been a strong supporter of the proposed education corridor, which will provide 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 offers job training and adult education opportunities beyond standardized secondary education.

Providing services to at-risk-youth is another priority for the City. Coeur d'Alene is diligent in seeking the best childcare regulations and encouraging growth of the industry so that working families can find affordable childcare. The City supports the local Head Start agency and agrees that education is an important step in eliminating the cycle of poverty. The City is pleased to have been a partner in the project to construct a Kroc Community Center in Coeur d'Alene. The Center has exceeded anticipated enrollment several times over since its opening and has a sliding scale for fees, allowing low-to-moderate income families and individuals to benefit from the Center's many programs at little or no cost.

Because transportation costs can be a large portion of the personal budget, the City of Coeur d'Alene is a partner with the Coeur d'Alene Tribe and other local jurisdictions in a regional bus system, CityLink, which provides transportation free of charge. The City contributes approximately \$46,000 annually to the program. Mid-size buses, approximately 32 passengers, run established routes from the southernmost point of the Reservation on US Highway 95 to Coeur d'Alene, Hayden, Post Falls and Rathdrum. Three routes have been established, two in the urban areas, and a third (the rural route) which connects the populations centers with the regions to the south. CityLink buses are accessible by ramp for persons who are physically unable to enter by the stairs and equipped with bicycle racks for those are combining modes of transportation. Unfortunately, City Link has experienced some budget cuts which has necessitated the reduction of some stops but the City has relayed the importance to the community of a stop close to the H.E.L.P. Center.

Actions planned to develop institutional structure

Many of the activities to assist low-to-moderate income persons, special needs individuals, the homeless, and other disadvantaged groups in Coeur d'Alene and Kootenai County area are delivered through an assortment of well established programs under the direction of established organizations and agencies such as IHFA and the Disability Action Center. Newer programs such as the H.E.L.P. Center, SHP, ESG and S+C are overseen by St. Vincent de Paul, or other local not for profit organizations. Additional non-profit efforts include Family Promise providing transitional housing for family and Community Action Partnership providing food bank services, weatherization, and circles (mentorship) program.

The City of Coeur d'Alene attends meetings on a regular basis to foster a communication network with these agencies and to remain informed regarding local and regional programs. 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.

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

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

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

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

The City of Coeur d'Alene receives no federal funding in addition to CDBG for housing and non-housing community development. IHFA is the PHA for the region and administers the Section 8 program in the City of Coeur d'Alene. During 2012 IHFA put \$2,672,075 into Region One for Project-Based Section 8 activities assisting 497 families. The Section 8 Housing Choice Voucher program provided \$2,056,726 in vouchers to 267 families in the City of Coeur d'Alene. The estimated amount available to assist households during Plan Year 2013 is based on 2012 figures and projected to be approximately the same.

The City is utilizing CDBG dollars in the amount of \$350,000 to purchase a 7-unit rental property at 106 Homestead Avenue. The City will be repaid with CDBG dollars over several plan years (PY2010-\$25,000, PY2011-\$100,000, PY2012-\$118,167, PY2013-\$106,833). The City is also partnering with St. Vincent de

Paul by long-term leasing City owned property at 102 Homestead Avenue. This property is scheduled to be a HUD 811 project and a 14-unit rental property is to be constructed at that site in the future. Currently, no CDBG dollars are allocated to be used at 102 Homestead Avenue.

The City will continue to attend IHFA quarterly housing roundtables and to support implementation of the 10-Year Plan to End Homelessness, which provides opportunities to discuss issues with most service providers within our community. Additionally, the City will continue attendance, support, and participation at the Region 1 Homeless Coalition meetings (Continuum of Care group).

Additional projected funding for the Coeur d'Alene area of approximately \$3,500,000 will be distributed through St. Vincent de Paul via the SHP, ESG, HPRP, CHDO, and other transitional housing grants. The established H.E.L.P. Center in Coeur d'Alene is the focal point for outreach and service to individuals and families seeking assistance. The City will continue to support and promote these efforts in coordination with the 10-Year Plan to End Homelessness.

The established H.E.L.P. Center in Coeur d'Alene provides a means for homeless, non-homeless and special-needs populations to access services. Numerous organizations and agencies assist LMI persons to participate by maintaining "office space" and conducting appointments at the Center, the services include housing, health care, social services, employment assistance, and Veteran's programs. The H.E.L.P. Center is an innovative partnership in which the City is contributing use of the old library building at a modest rent.

Discussion

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

Program Specific Requirements

AP-90 Program Specific Requirements

Introduction

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

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220.(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	80.00%

Discussion

The City of Coeur d'Alene's CDBG funds do not have any other program specific requirements to address at this time. Should any program income begin, HUD regulations would be followed on usage and reporting. No grant funds have been returned to the line of credit.

ATTACHMENT 1

Community Stakeholders/ Interested Groups

**ATTACHMENT 1
COMMUNITY STAKEHOLDERS / INTERESTED GROUPS**

ORGANIZATION	CONTACT	PHONE	EMAIL
Community/Economic Development			
Idaho Department of Commerce	Dennis Porter	208-287-0782	dennis.porter@community.idaho.gov
Idaho Department of Labor	Alivia Metts	769-1558 x3984	alivia.metts@labor.idaho.gov
Jobs Plus	Steve Griffiths	667-4753	steve@jobsplusonline.org
LCDC (Urban Renewal Agency)	Tony Berns	292-1630	tonyb@lcdc.org
Panhandle Area Council	Jim Deffenbaugh	772-0584 x3005	jimd@pacni.org
	Nancy Mabile	772-0584 x3014	nancy@pacni.org
Community Members/Business			
CDA Chamber of Commerce	Steve Wilson	292-1626	steve@cdachamber.com
CDA Downtown Association	Terry Cooper	667-5986	terry@cdadowntown.com
CDA Press	Sholeh Patrick	664-8176	sholehjo@hotmail.com
Concerned businesses of NI	LaDonna Beaumont		ladonnabeaumont@gmail.com
Fresh Start	Howard Martinson	667-9798	howard.martinson@gmail.com
Gnosis Corp.	Austen VanLack	208-683-0967	mavanlack@gnosiscorp.com
Ground Force Manf.	Ron Nilson	664-9291	rnilson@gmfg.com
HP/Work at home	Anita Parisot	667-0662	anita@anitaparisot.com
Kiwanis	Jon Ingalls		joning@cdaid.org
Messina Construction	Tom Messina	765-5714	tmessina@messinacconstruction.com
NAMI	Bill and Agnes Harger	664-8485	aorharger@gmail.com
Rotary	Steve Roberge	765-4968	sroberge@wm.com
Volunteers of America	Brandi Smitherman		bsmitherman@voaspokane.org
Education			
CDA School District 271	Hazel Baumann	664-8241	hbauman@cdaschools.org
Lakeland School District	Brad Murray	687-0431	bmurray@lakeland272.org
North Idaho College	Ron Dorn	769-3340	Ron_Dorn@nic.edu
North Idaho College President	Joe Dunlap	769-3303	jhdunlap@nic.edu
Post Falls School District	Jerry Keane	773-1658	jkeane@sd273.com
Financial Institutions			
Wells Fargo Advisors	Cort Wilcox	676-2036	cort.wilcox@wellsfargoadvisors.com
Mountain West Bank/NIBCA	Judy Morris	763-3432	jmmorris@mtnwb.com
Panhandle State Bank	Dave Dean	755-2806	daved@panhandlebank.com
US Bank	Rick Murray	769-4537	richard.murray@usbank.com
Government - City/County			
CDA Mayor	Sandi Bloem		Hand deliver notices
CDA Councilmember	Dan Gookin		Hand deliver notices
CDA Councilmember	Deanna Goodlander		Hand deliver notices
CDA Councilmember	Mike Kennedy		Hand deliver notices
CDA Councilmember	Ron Edinger		Hand deliver notices
CDA Councilmember	Steve Adams		Hand deliver notices
CDA Councilmember	Woody McEvers		Hand deliver notices

**ATTACHMENT 1
COMMUNITY STAKEHOLDERS / INTERESTED GROUPS**

City of Hayden Admin.	Stefan Chatwin		schatwin@cityofhaydenid.us
City of Hayden Councilmember's	Roger Saterfiel		rsaterfiel@kcgov.us
City of Post Falls Admin.	Shelly Enderud	773-3511	senderud@postfallsidaho.org
K.C.Misdemeanor Probation	Misd. Probation	446-1992	kcmp@kcgov.us
Kootenai County Commissioner	Todd Tondee	446-1000	kcinfo@kcgov.us
Kootenai County Grant Writer	Jody Bieze	446-1612	jbieze@kcgov.us
Kootenai Sheriff (CDBG Ad Hoc)	Ben Wolfinger	446-1311	bwolfinger@co.kootenai.id.us
Government - Other			
IDOL	Robert Shoeman	769-1558	robert.shoeman@labor.idaho.gov
IDOL	Vicki Kunz	769-1558 x3941	vicki.kunz@labor.idaho.gov
Panhandle Health District	Lora Whalen	(208) 415-5100	lwhalen@phd1.idaho.gov
State Dep. Of H&W - Navigator	Bob Driscoll	665-8864	DriscollR@dhw.idaho.gov
Groups/Organizations/Service Providers			
CAP	Mark Haberman	770-3008	m.haberman@cap4action.org
CAP	Mary Herrick	664-8757 x. 203	m.herrick@cap4action.org
CDBG Ad Hoc Committee	Chris Copstead	667-2314	chris@chriscopstead.com
CDBG Ad Hoc Committee	Vicki Isakson		vicki.isakson@cl.idaho.gov
Children's Village	Janie Gavis	667-1189	janie@thechildrensvillage.org
Coeur d'Alene Homes	Mike Grabenstein	664-8119	mike@heritageplace.org
Consultant	Meredith Bryant		cdabryant@gmail.com
Family Promise	Cindy Wood	714-4870	cwood@familypromiseni.org
Goodale & Barbieri	Sheryldene Rogers	509-777-6352	srogers@g-b.com
Habitat for Humanity	Eula Hickam	762-4532	ehickam@roadrunner.com
Idaho Legal Aid	Alan Wasserman		alanwasserman@idaholegalaid.org
Idaho Drug Free Youth (IDFY)	Amy Bartoo	664-4339	idfy@idahodrugfreeyouth.org
IHFA Family Self Suff.	Bette Woinowsky	667-3380	bettew@ihfa.org
Intermountain Fair Housing Counsel	Heidi Nice		niceparalegalservices@gmail.com
Kootenai Perspectives	Noelle Adams		noelleterese@yahoo.com
Lake City Center	Rick Currie	667-4628	cdaseniors@yahoo.com
League of Women Voters	Judy Francis	664-5659	judyofrancis@gmail.com
Mothers Against Drunk Driving	Carolyn Mattoon		carolyn.Mattoon@madd.org
Salvation Army	Ben Markham	667-1865	info@kroccda.org
Shelter Associates	Art Elliot	664-0372	art@shelterassociates.com
St. Vincent De Paul	Holly Knapp	664-3095	holly@stvincentdepaulcda.org
St. Vincent De Paul	Jeff Conroy	664-3095	jeff@stvincentdepaulcda.org
St. Vincent De Paul	Shelly Hines	664-3095	shelly@stvincentdepaulcda.org
TESH	Russ Dumas	CEO	rdumas@teshinc.com
United Way of Kootenai County	Caryl Johnston	667-8112	caryl@kootenaiunitedway.org
Volunteers of America	Mary Tracy	509-624-2378x 104	mtracey@voaspokane.org
Women's Center	Joe Robinson	664-9303	wccgen@roadrunner.com

**ATTACHMENT 1
COMMUNITY STAKEHOLDERS / INTERESTED GROUPS**

Health Care			
Kootenai Health	Terry Farr	666-2000	tfarr@kmc.org
Kootenai Medical Center	Dan Klocko	666-2057	dklocko@kmc.org
Kootenai Medical Center	Irwin Hurn/Sue Walker	666-2012	lhurn@KMC.org ; swalker@KMC.org
Dirne Community Health Center	Mike Baker	292-0256	mbaker@dheidaho.org
Aadvent Community Health Services	Leanne Rousseau MD	215-8766	rousseau.leanne@gmail.com
Housing Agencies/Developers			
Greenstone	Jason Wheaton		info@greenstonehomes.com
IHFA	Eric Kingston	208-331-4706	Erikk@ihfa.org
IHFA - CDA Branch Office	Laurie Taylor	667-3380	lauriet@ihfa.org
North Idaho Housing Coalition (NIHC)	Bruce Cyr	773-6745 x222	brucec@riverbendcp.com
North Idaho Housing Coalition	Lori Isenberg	665-4663	lori@northidahohousing.org
USDA	Jeff Beeman	769-4939 x118	jeff.beeman@id.usda.gov
USDA	Joseph Cool	762-4939	Joseph.Cool@id.usda.gov
Whitewater Creek Development	Todd and Maryann	772-0108	toddp@whitewatercreek.com
Individuals/Disability Advocates			
Management Consultant	Frank Orzell	819-2919	frorzell@adelphia.net
	Jayne and Russ	665-2172	1866 W. Windsor Ave., CDA
North Idaho AIDS Coalition	Stacie Lehot		stacie@northidahoaidcoalition.org
	Disability Action Center	664-9896	cda@dacnw.org
Trinity Group Homes	Bob Runkle	691-2499 cell	rrunkle@gmail.com
	Don Waddell	667-8798	scjmustang@gmail.com
Real Estate Development			
Architects West	Scott Fischer	667-9402	scottf@architectswest.com
CDA Assoc. of Realtors	Kenn Gimbel	664-9221	gimbel@msn.com
CDA Assoc. of Realtors	Rick Vernon	667-0664	rick@cdarealtors.com
Century 21	Carrie Oja		coja@21goldchoice.com
Copper Basin Construction	Linda Davis	765-5059	linda@copperbasin.com
JUB Engineers	Dale Baune, P.E	762-8787	dbaune@jub.com
Local Developer/IHFA board	Jack Beebe	667-0485	
Miller Stauffer Architects	Monte Miller	667-1773	monte@millerstauffer.com
NIBCA	Cassie Worth	765.5518	cassie@nibca.com
Pioneer Title Comp.	Cheryl Shippy	664-8254	cshippy@pioneercca.com
Property Owner	Steve Widmyer		swidm10608@aol.com
Remax	John Corcoran		JohnCorcoran@topProducer.com
Treaty Rock	Tim Herzog	773-1748	timherzog@treatyrock.com
Underhill Construction, Inc. Past	Rod Underhill	755-1096	
Welch Comer & Assoc.	Philip Boyd	664-9382	phil@welchcomer.com
Windermere	Pat Krug		patkrug@windermere.com

ATTACHMENT 1
COMMUNITY STAKEHOLDERS / INTERESTED GROUPS

HUD (Send when updating Consolidated Plan)			
Field Office Director	Bill Fattic		bill.fattic@hud.gov
HUD Region Rep.	Doug Carlson		doug_carlson@hud.gov

ATTACHMENT 2

Citizen Participation

Citizen Participation Plan
Citizen Survey
Public Comments
Public Notices
Public Forum Attendance Sheets
Public Forum Presentation
City Council Workshop Presentation
Public Hearing Presentation

CITIZEN PARTICIPATION PLAN

Purpose

The purpose of the Citizen Participation Plan is to set forth the City of Coeur d'Alene's procedure for citizen participation. This Plan applies to the City's use of U.S. Department of Housing and Urban Development (HUD), Community Development Block Grant (CDBG) funds. The Plan will provide information that outlines the steps to be taken to assure that its citizens have an opportunity to participate and contribute ideas in the development of the City's Consolidated Plan and related documents. The Citizen Participation Plan was drafted in accordance with Sections 91.100, 91.105, and 91.505 of HUD's Consolidated Plan regulations.

Citizen Involvement

This Plan provides for and encourages all citizens of the community, public and community agencies, minorities, persons with special needs and/or persons who are often underrepresented in public process, specifically low and moderate-income persons and persons living in areas where CDBG funds are proposed, and persons who are homeless, to participate in:

- Development of a Five-Year Consolidated Plan;
- Annual Action Plans;
- Consolidated Annual Performance & Evaluation Reports (CAPER);
- Substantial amendments to a Consolidated Plan and/or Action Plan; and
- Citizen Participation Plan amendments.

Public Meetings

The City considers any regular or special meeting of City Council and/or any public forum conducted for the purposes of obtaining citizens' views and to respond to proposals and questions as meeting the public hearing requirements under HUD's Consolidated Plan regulations.

The City will conduct at least two (2) public hearings during the plan year which will occur at two different stages in the program year. Together, the hearings will address housing and community development needs, development of proposed activities, and review of program performance.

Consolidated Plan/Annual Action Plan – During the first year of development of the five year **Consolidated Plan** approximately three (3) public forums will be held in various locations throughout the City, with an emphasis on low and moderate income areas. A minimum of one forum will be held before the proposed Consolidated Plan is published for comment. One forum will be held during the day to accommodate persons with disabilities, seniors, and others who have limited ability to attend evening meetings. Thereafter, for the **Annual Action Plans** prepared each year of the Consolidated Plan, one (1) public forum will be held to inform residents of how CDBG funds were used in past program years and to obtain citizen input about current needs and spending priorities. This forum will be held before the Action Plan is published for comment.

Prior to the final adoption of the Consolidated Plan/Annual Action Plan a meeting will be held before the City Council to present the Consolidated Plan goals, proposed activities, the estimated annual funding the City expects to receive, and the expected beneficiaries. This meeting will be held during the thirty (30) day public comment period.

Consolidated Annual Performance and Evaluation Report (CAPER)- A public hearing will be held for the purpose of obtaining citizens' comments on the Consolidated Annual Performance and Evaluation Report (CAPER) and can be combined to address current housing and community development needs in the development of the Consolidated Plan and/or Action Plan. This hearing may be held during the CAPER fifteen (15) day public comment period.

The City will provide appropriate materials, equipment, and interpreting services to facilitate the participation of non-English speaking persons and persons with visual and/or hearing impairments, with at least seven (7) days advance notice prior to the meeting date.

Notification

Public Meetings - **notices** will be published at least two (2) weeks in advance of any public meeting date. The City will advertise through notice in the local newspaper of record. The notice shall provide sufficient information regarding the subject of the meeting to permit informed comments from the public.

Other forms of notification to citizens of public meetings may include distribution by means of e-mails, brochures, personal contact with agencies and advocates, announcements on the City's website, CDATV channel, and press releases.

Comment Periods – **notices** will be published to coincide with the commencement date of the comment period. The notice shall include a summary description of the documents content and purpose and list locations where full copies are available for examination. Notices of comment periods will also be sent by mail or email to citizens or groups who attended any of the CDBG forums or public hearings.

Location

City Council meetings will be held during the evening so that a majority of the community can attend.

Public Forums will be held at various locations to ensure easy access to the community. The following are possible locations: the Police Station to the North, City Hall to the South, Fire Station 3 to the East, Lake City Center to the West. Additional locations may include the Kroc Community Center (North), the Library (South), Head Start Center (East), and North Idaho College (West).

All public meetings will be held in locations accessible to low and moderate income residents, potential and actual beneficiaries, and people with disabilities.

Public Comment

The City will make available in draft form the Citizen Participation Plan, Consolidated Plan, Annual Action Plan, the CAPER, and substantial amendments for citizens' review and comments. Full copies of these documents will be made available at City Hall and posted on the City's website at www.cdavid.org. Summary descriptions will be included in the published comment period notice.

Comment periods:

30-days: No less than thirty (30) days for the Citizen Participation Plan, Consolidated Plan, Annual Action Plan, and any substantial amendments.

15-days: No less than fifteen (15) days for the Consolidated Annual Performance and Evaluation Report (CAPER).

Comments or views of citizens both in writing or orally at public hearings will be considered in the development of the Citizen Participation Plan, Consolidated Plan, Annual Action Plan, CAPER, and any related substantial amendments. A summary of the comments and a summary of comments not accepted and the reasons for dismissal will be attached to the final documents.

Substantial Amendments

Recognizing that changes may be necessary to the Consolidated Plan, Annual Action Plans and related documents, HUD allows for these amendments. The following criteria shall constitute a substantial amendment.

Any change in use of CDBG funds from one eligible activity to another, that involves an increase or decrease of funding of any approved activity, or project that is greater than twenty percent (20%) of the annual allocation.

A public notice is required for all substantial amendments. The City will publish the notice for a public hearing and provide notice of the established thirty (30) day comment period. The notice will give a summary description of the proposed amendment and list locations where full copies of the document are available for examination. A summary of the comments, and a summary of comments not accepted and the reasons for dismissal will be attached before the documentation is submitted to HUD for review and approval.

Access to Records

Citizens, public agencies or other interested persons will be granted timely access to information and records relating to the City's Consolidated Plan and the City's use of federal funds covered by this document during the preceding five (5) years.

Copies of the Consolidated Plan as adopted, Annual Action Plan, substantial amendments, and the Consolidated Annual Performance and Evaluation Report (CAPER) will be available for review in the Administration Department of the City and also available for download in an electronic version, at no cost, from the City's web site at www.cdaid.org.

Complaint Procedures

The City will provide a substantive written response to all written citizen complaints related to the Consolidated Plan, Annual Action Plan, amendments, and the CAPER within fifteen (15) working days of receiving the comments and complaints. Written complaints must clearly state the complainant's name, address, and zip code. A daytime telephone number should also be included in the event further information is needed. If a response cannot be prepared within a fifteen (15) day period, the complainant will be notified of the approximate date of when a response can be provided.

Consultation with Organizations and City Agencies

When preparing the Consolidated Plan, Annual Action Plan and related documents, the City will actively consult with public and private agencies that provide housing, health and social services (including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons) in order to ensure that the interests and needs of all groups are being adequately addressed. Additionally, the City shall consult with state and local health and child welfare agencies regarding data related to lead based paint hazards and poisonings including health department data on the addresses of housing units in which children have been identified as lead poisoned. The consultation will occur through the regional forums, interviews and/or focus groups. At least one focus group or series of interviews with relevant stakeholders will be conducted during the Consolidated Plan and Annual Action Plan.

Technical Assistance

The City, through its Administration Department and/or designated consultant, will also provide technical assistance to individuals and organizations representing low, very low and extremely low income people, who are interested in submitting a proposal to obtain funding for an activity. Such assistance may include offering application guidance, information resources, and trainings regarding the funded programs, but will not include preparing proposals on behalf of such individuals or organizations, nor may it provide any assurances that activities discussed will receive funding under an Action Plan as a result of the City's provision of technical assistance.

Policy to Minimize Displacement

Policy to Minimize Displacement

The City will make every reasonable effort to avoid displacement. Where that is not possible, every effort will be made to minimize the number of persons displaced by activities funded through the federal resources described in the City's Consolidated Plan and Annual Action Plans. In the event that a person is displaced in undertaking an activity, assistance will be offered in accordance with the City of Coeur d'Alene Anti-Displacement Resolution (Res. No. 04-011), which is on file in the City Clerk's office. The City adheres to the Federal Uniform Acquisition and Relocation Assistance Act.



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City of Coeur d'Alene CDBG Prioritization of Activities
Community

[Design Survey](#) [Collect Responses](#) [Analyze Results](#)

- [View Summary](#)
- [Browse Responses](#)
- [Filter Responses](#)
- [Crosstab Responses](#)
- [Download Responses](#)
- [Share Responses](#)

Default Report [+ Add Report](#)

Response Summary

Total Started Survey: 53
Total Finished Survey: 53 (100%)

PAGE: 1

1. Are you a City of Coeur d'Alene Resident?

[Create Chart](#) [Download](#)

	Response Percent	Response Count
Yes	60.8%	31
No	39.2%	20

Other (please specify) [Show Responses](#) 14

answered question 51

skipped question 2

2. By completing this survey, who are you representing?

[Create Chart](#) [Download](#)

	Response Percent	Response Count
Business/Industry	3.8%	2
Citizen (Self)	43.4%	23
Community/Economic Development	0.0%	0
Disability Advocate	7.5%	4
Housing Developer	3.8%	2
Education	0.0%	0
Financial Institution	0.0%	0
Government	5.7%	3
Health Care	7.5%	4
Housing Agency	0.0%	0

answered question 53

skipped question 0

2. By completing this survey, who are you representing?	Create Chart	Download
Non-Profit Organization	13.2%	7
Real Estate Development	1.9%	1
Service Provider	9.4%	5
Other (please specify) Hide Responses	3.8%	2

[Responses \(2\)](#) | [Text Analysis](#) | [My Categories \(0\)](#)

GOLD FEATURE: Text Analysis allows you to view frequently used words and phrases, categorize responses and turn open-ended text into data you can really use. To use Text Analysis, upgrade to a GOLD or PLATINUM plan. [Learn More](#) [Upgrade »](#)

Showing 2 text responses No responses selected

<p>Advocate and professional in SUD services 7/25/2012 9:36 AM View Responses</p>
<p>aging population 7/18/2012 9:12 AM View Responses</p>

answered question 53

skipped question 0

3. The following are 15 potential activities that could be undertaken with Community Development Block Grant funds. Please identify the funding level for each activity as you see appropriate: [Create Chart](#) [Download](#)

	High	Medium	Low	None	Response Count
Property acquisition for benefit of Low and Moderate-Income persons	45.1% (23)	19.6% (10)	21.6% (11)	13.7% (7)	51
ADA accessibility modifications to public facilities	29.4% (15)	41.2% (21)	25.5% (13)	3.9% (2)	51
Construction of emergency shelters or transitional housing	37.7% (20)	32.1% (17)	17.0% (9)	13.2% (7)	53
Construction of parks/recreational activities	14.0% (7)	34.0% (17)	36.0% (18)	16.0% (8)	50
Water/Sewer Improvements	10.6% (5)	40.4% (19)	42.6% (20)	6.4% (3)	47
Sidewalk repairs/accessibility modifications	24.5% (12)	28.6% (14)	38.8% (19)	8.2% (4)	49

answered question 53

skipped question 0

3. The following are 15 potential activities that could be undertaken with Community Development Block Grant funds. Please identify the funding level for each activity as you see appropriate: [Create Chart](#) [Download](#)

Activity	50.0% (25)	30.0% (15)	10.0% (5)	10.0% (5)	Count
Public services (homeless, senior, ADA, or youth programs)	50.0% (25)	30.0% (15)	10.0% (5)	10.0% (5)	50
Substance abuse/mental health services	46.2% (24)	25.0% (13)	15.4% (8)	13.5% (7)	52
Job Training	28.8% (15)	42.3% (22)	19.2% (10)	9.6% (5)	52
Crime reduction/awarness activities	19.6% (10)	43.1% (22)	29.4% (15)	7.8% (4)	51
Down Payment Assistance to prospective home buyers	12.0% (6)	22.0% (11)	42.0% (21)	24.0% (12)	50
Rehabilitation of existing owner-occupied homes (Emergency Minor Home Repair & Accessibility Program)	17.3% (9)	51.9% (27)	21.2% (11)	9.6% (5)	52
Rehabilitation of existing rental housing	11.8% (6)	37.3% (19)	37.3% (19)	13.7% (7)	51
Code enforcement to prevent/reverse deteriorating homes/properties	16.0% (8)	34.0% (17)	28.0% (14)	22.0% (11)	50
Low-interest loans to low-income entrepreneurs or to retain businesses that employ low-income workers	28.8% (15)	32.7% (17)	23.1% (12)	15.4% (8)	52
answered question					53
skipped question					0

4. Thank you for participating in this survey. Your answers will provide guidance for the City's Consolidated Plan. Please feel free to provide any additional ideas or comments regarding the CDBG program. [Download](#)

	Response Count
Show Responses	16
<hr/>	
answered question	16
skipped question	37

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CITY OF COEUR D'ALENE CONSOLIDATED PLAN 2012-2018
PUBLIC COMMENTS RECEIVED
AS OF DECEMBER 17, 2012

HOUSING

- The agency/program I work for has been fortunate enough to receive CDBG funding for the past two years in order to provide housing counseling to City residents. I was busier than one person could handle for the majority of the funding period. Talking to dozens of people each week. I believe residents continue to need assistance in this arena, with questions ranging from searching for rentals to dealing with landlord issues to help avoiding foreclosure. It is an important service I would like to see continued. In addition, a large portion of my clients are seeking affordable (subsidized) housing. There is a tremendous need for more housing so I think any efforts put toward that need would be money well spent. Thank you.

INFRASTRUCTURE

- Our community is in desperate need of a detox facility or drop off center for SUD clients - as well as safe and sober housing with work programs to get people back on their feet
- Funding for a hold center to reduce hospital and jail time for people in acute crisis on substances. Funds to protect renters/homeowners in short term financial difficulty to prevent homelessness.

ECONOMIC DEVELOPMENT

- Low interest loans and other ways to help those who want to start their own businesses (but have little or no capital) to do so.

EDUCATION

- As long as education is included

PUBLIC SERVICE

- I would like for CDA to have a self-insured or Opt-In dental program available to anyone without dental insurance, or those classified as low income. This could be in addition or an extension to Dirne Community Clinic who is operating above capacity already. Children, families and working poor could be prioritized. Dental Hygienists and dentists could either volunteer or receive a small stipend per diem or number of clients completed. You can't get a quality job without good teeth/health. The need is great and we deal with homeless people everyday who can't get a living wage job.
- To continue to be a desirable place to live, coordination of services for people in major life transitions are key. Empowering through support and education with an eye to accessibility is essential. It may be worthwhile looking at the topic of 'naturally occurring retirement communities' to view how it has worked in other areas for strategic planning for Coeur d'Alene. Thank you.
- The homeless and mentally ill people have little to no voice in the political system, please let's assist them as much as possible.

- More programs for individuals that are seniors and that are disabled.
- I was not able to attend the public forums on this subject. I did take time to fill out the online survey; however, that did not give me the chance to be as specific as I would like to be in my comments.

I want to address the need for Coeur d'Alene to prepare for an aging population. When taking on some very specific activities in the area, cities have found a benefit for their entire citizenry.

I have had the opportunity to review and share some of the Smart Growth materials, especially those related to their aging initiative. I think these initiatives should be a significant component of Coeur d'Alene's plan, considering the growth of the aging population and how popular Coeur d'Alene and Kootenai County have been viewed as a retirement community. Examples of these initiatives include 1) staying active, connected, and engaged; 2) development and housing; 3) transportation and mobility; 4) and staying healthy. More information can be found at www.epa.gov/agiing/bhc/about.htm and www.smartgrowthamerica.org

One recent conversation I held was with the Governing Board of Coeur d'Alene Homes and how their neighborhood could be developed as a model in the community, then the concept promoted city and county wide.

Both Mike Grabenstein of CDA Homes and I welcome an opportunity to further discuss this concept with the City of Coeur d'Alene and believe inclusion in the 2013-2018 CDBG Plan would add significant value to enhancing the city's infrastructure in terms of citizen appeal. Please keep in touch with me about the plan development and how the Area Agency on Aging can be a partner in advancing Smart Growth and Active Aging forward in Coeur d'Alene. --Pearl Bouchard, Director, Area Agency on Aging of North Idaho

GENERAL

- please continue to actively pursue funding for all available monies for this and surrounding communities. Thanks
- Consider offering annual competitive grant submissions. Looking 5 years into the future in such a tumultuous period of socioeconomic change may be far more difficult than one could guess. Locking in/ restricting funds today for a future with significant shifts in employment, housing prices or utilities/commodities may prove unwise.
- I am impressed with the quality and effectiveness of the CDBG program fund usage.
- The city should not be accepting federal funds for any of this, but if it is being forced to do so (it should still attempt to refuse) it should use those for useful public interests such as parks/rec building & activities, water/sewer infrastructure improvements, and street/sidewalk repairs.
- The city should send the money back to the Feds. If every town did this it would make way for charity and volunteer organizations to help those truly in need.

From: Tom Torgerson [<mailto:tomtorg@roadrunner.com>]
Sent: Monday, January 14, 2013 3:16 PM
To: MCLEOD, RENATA
Cc: 'John Eaton'; 'Rick Vernon'; 'Denise Lundy'; tomtorg@roadrunner.com
Subject: RE: Draft Coeur d'Alene Consolidated Plan & Action Plan
Importance: High

Renata

My comments are as follows:

As a CDA native and business person I want to support the city's venture to assist non-profit agencies like St. Vincent dePaul with their housing assistance programs through these federal grants. I believe that is a smart utilization of federal dollars to assist the locals who are in need.

As a representative for the CDA Association of Realtors in Governmental Affairs I cannot yet make a statement from policy regarding my next comment due to the lack of comment time. However, I believe from prior discussions with many members, these comments are commonly felt.

While public assistance and help with low income housing is an incredibly valiant and worthwhile venture I cannot support ANY venture that allows governmental agencies to compete with private enterprise. This aspect of unfair competition has been exploited in the past thru HUD grants administered via IHFA where lucrative tax credits are granted to individuals who build "low income" housing. Those credits are then SOLD to third parties thereby granting the developers unheard of fiscal benefit all in the name of "low income housing".

Please understand...the need for housing options for the financially challenged are in dire need...and I support that effort. However...granting salable tax credits to "for profit" entities are not acceptable.

Sincerely,

Tom Torgerson

Tom Torgerson, CPA, CRS
Century 21 Beutler & Associates
1836 Northwest Blvd.
Coeur d'Alene, ID 83814
208-640-8086 cell 800-786-4555 office
www.TheIdahoAgent.com

Nancy Mabile

From: MCLEOD, RENATA [RENATA@cdaid.org]
Sent: Tuesday, July 17, 2012 2:05 PM
To: 'Nancy Mabile'
Subject: RE: Coeur d'Alene CDBG Consolidated Planning Workshop

Thank you for responding to this and providing the large amount of information!!! ☺ R

From: Nancy Mabile [mailto:nancy@pacni.org]
Sent: Tuesday, July 17, 2012 1:17 PM
To: 'Frank Orzell'
Cc: MCLEOD, RENATA
Subject: RE: Coeur d'Alene CDBG Consolidated Planning Workshop

Certainly. The Community Development Block (CDBG) comes from the U.S. Department of Housing and Urban Development (HUD). The existing goals and objectives can be found on the City's website at: <http://www.cdaid.org/index.php/city-info/community-development-block-grant> Also included on this website is the current Consolidated Plan and all reports and documents required under the program.

More information on the CDBG program in general can be found on HUD's website at: http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/communitydevelopment/programs/entitlement

The Consolidated Plan for the CDBG funds must be updated every five (5) years. The workshop on Thursday will provide an overview of the program and allow for public input on the goals and objectives.

Regards,

Nancy Mabile
Economic Development Planner
Panhandle Area Council
11100 N. Airport Drive
Hayden, ID 83835
PH: 208-772-0584, ext. 3014
FX: 208-772-6196
<http://www.pacni.org/>

From: Frank Orzell [mailto:frorzell@adelphia.net]
Sent: Tuesday, July 17, 2012 12:54 PM
To: 'Nancy Mabile'
Subject: RE: Coeur d'Alene CDBG Consolidated Planning Workshop

Could you provide me with information regarding the goals, objectives and purpose of the CDBG funding and what governmental organization provides them?

Thanks

Frank Orzell
819-2919
frorzell@adelphia.net

From: Nancy Mabile [<mailto:nancy@pacni.org>]
Sent: Monday, July 16, 2012 12:23 PM
To: Nancy Mabile
Subject: Coeur d'Alene CDBG Consolidated Planning Workshop

Greetings,

The City of Coeur d'Alene is hosting its second public workshop to seek input regarding use of federal Community Development Block Grant (CDBG) funds over the next five years. The workshop will be held July 19, 2012, noon, at City Hall, Old Council Chambers (710 Mullan Avenue, Coeur d'Alene). Please distribute the attached flyer throughout your organization and try to attend, as your input is important.

Surveys are still being accepted through **Friday, July 27**. If you have not already done so, please complete the survey using the following link: <http://www.surveymonkey.com/s/ZZZ5NLN>

Regards,

Nancy Mabile

Economic Development Planner

Panhandle Area Council

11100 N. Airport Drive

Hayden, ID 83835

PH: 208-772-0584, ext. 3014

FX: 208-772-6196

<http://www.pacni.org/>

It's your City - help plan it!

The City of Coeur d'Alene needs your input regarding the planned spending of Community Development Block Grant funds for the Program Year period of 2013 through 2018. The City is starting a process called the Consolidated Plan, which will determine how these Federal funds will be spent in your community over the next five years.

How to Get Involved

You can participate in the Consolidated Plan process by:

- ◆ Attending a public forum;
- ◆ Attending a public hearing;
- ◆ Sending us a letter or email; or
- ◆ Filling out a survey available at www.cdaid.org or City Hall Customer Service Center

Public Forums

On June 13 and July 19 public forums will be held to gather public input on housing and community development needs. During the forums, citizens, social service agencies, homeless and housing providers, health professionals and advocates will come together to discuss the most pressing needs in their neighborhoods and in the City. Please join us at one of the forums listed on the right.

Public Hearings

The draft Consolidated Plan will be available for review in **mid-September, 2012**. A hearing will be held to take public comments on the Draft Plan on December 18, 2012. Dates, times, and locations for the planning meetings are listed on the right.

Written Comments or Survey

Can't make the forums or public hearings? Be sure to send a letter, e-mail, or fill out the online survey about your community needs and how you think funding should be allocated in the City.

Contact Information

For more information about the Consolidated Planning process, please contact **Nancy Mabile, Grant Administrator, at (208) 772-0584, ext. 3014 or email at: nancy@pacni.org** or mail to:

Consolidated Plan
City of Coeur d'Alene
Attn: Renata McLeod
710 E. Mullan Avenue
Coeur d'Alene, Idaho 83814
(208) 666-5741
FAX: (208) 769-2366

Public Forum Schedule

June 13, 2012

Fire Station 3
1500 N. 15th Street
5:30 PM - 7:30 PM

July 19, 2012

**City Hall Council
Chambers**
710 E. Mullan Avenue
Noon - 2:00 PM

The City will make reasonable accommodations for anyone attending the meetings who requires special assistance for hearing, physical, or other impairments. Please contact Renata McLeod at (208) 666-5741 at least 24 hours in advance of the meeting date and time.



The following Display Ad was published in the Coeur d'Alene Press on June 4 and July 10, 2012, and in the Nickel's Worth on June 7 and July 12, 2012.



It's your City—help plan it!

The City of Coeur d'Alene needs your input for the Community Development Block Grant (CDBG) Consolidated Plan process. Your participation will assist the City in determining where Federal funds for the CDBG Program Years 2013—2018 should be spent.

Get involved — your participation is important! Public forums have been scheduled for your participation.



Can't make the public forum? Be sure to send a letter, email, or fill out the online survey at www.cdaid.org.

For more information:

- www.cdaid.org
- Nancy Mabile, Panhandle Area Council, 772-0584 x3014
- Renata McLeod, City of Coeur d'Alene, 666-5741

The draft Consolidated plan is expected to be available for review in mid-September, 2012.

Public Forum Schedule

June 13, 2012
5:30 PM
Fire Station 3
1500 N 15th St

July 19, 2012
Noon
City Hall
710 E Mullan

The City will make reasonable accommodations for anyone attending the meetings who requires special assistance for hearing, physical, or other impairments. Please contact Renata McLeod at (208) 666-5741 at least 24 hours in advance of the meeting date and time.

SIGN-IN SHEET

PUBLIC MEETING FOR: Public Forum – City of Coeur d'Alene Consolidated Plan
 LOCATION: Fire Station #3, 1500 N 15th Street, Coeur d'Alene
 DATE/TIME: June 13, 2012 – 5:30 PM

Attendance is monitored to ensure equal opportunity. We appreciate your providing this information. This information will only be used to monitor attendance at public meetings and for affirmative action purposes, as specified by law (CFR 42.21.9).

Name	Title/Representing	Address (City, State, Zip)	Phone	Please Check the Appropriate Boxes	
Ben Millo		913 E Garden	208 292 5891	<input checked="" type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Disabled	<input type="checkbox"/> American Indian/Alaskan Native <input type="checkbox"/> Asian/Pacific Islander <input type="checkbox"/> Black <input checked="" type="checkbox"/> Hispanic <input type="checkbox"/> White <input type="checkbox"/> Other
Janet Bourgeois		810 Victorian Dr	208-667-3733	<input type="checkbox"/> Male <input checked="" type="checkbox"/> Female <input type="checkbox"/> Disabled	<input type="checkbox"/> American Indian/Alaskan Native <input type="checkbox"/> Asian/Pacific Islander <input type="checkbox"/> Black <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> White <input type="checkbox"/> Other
				<input type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Disabled	<input type="checkbox"/> American Indian/Alaskan Native <input type="checkbox"/> Asian/Pacific Islander <input type="checkbox"/> Black <input type="checkbox"/> Hispanic <input type="checkbox"/> White <input type="checkbox"/> Other
				<input type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Disabled	<input type="checkbox"/> American Indian/Alaskan Native <input type="checkbox"/> Asian/Pacific Islander <input type="checkbox"/> Black <input type="checkbox"/> Hispanic <input type="checkbox"/> White <input type="checkbox"/> Other
				<input type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Disabled	<input type="checkbox"/> American Indian/Alaskan Native <input type="checkbox"/> Asian/Pacific Islander <input type="checkbox"/> Black <input type="checkbox"/> Hispanic <input type="checkbox"/> White <input type="checkbox"/> Other
				<input type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Disabled	<input type="checkbox"/> American Indian/Alaskan Native <input type="checkbox"/> Asian/Pacific Islander <input type="checkbox"/> Black <input type="checkbox"/> Hispanic <input type="checkbox"/> White <input type="checkbox"/> Other
				<input type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Disabled	<input type="checkbox"/> American Indian/Alaskan Native <input type="checkbox"/> Asian/Pacific Islander <input type="checkbox"/> Black <input type="checkbox"/> Hispanic <input type="checkbox"/> White <input type="checkbox"/> Other
				<input type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Disabled	<input type="checkbox"/> American Indian/Alaskan Native <input type="checkbox"/> Asian/Pacific Islander <input type="checkbox"/> Black <input type="checkbox"/> Hispanic <input type="checkbox"/> White <input type="checkbox"/> Other
				<input type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Disabled	<input type="checkbox"/> American Indian/Alaskan Native <input type="checkbox"/> Asian/Pacific Islander <input type="checkbox"/> Black <input type="checkbox"/> Hispanic <input type="checkbox"/> White <input type="checkbox"/> Other

SIGN-IN SHEET

PUBLIC MEETING FOR: Public Forum – City of Coeur d'Alene Consolidated Plan
 LOCATION: City Hall, Old Council Chambers, 710 E Mullan Ave, Coeur d'Alene
 DATE/TIME: July 19, 2012 – 12:00 PM

Attendance is monitored to ensure equal opportunity. We appreciate your providing this information. This information will only be used to monitor attendance at public meetings and for affirmative action purposes, as specified by law (CFR 42.21.9).

Name	Title/Representing	Address (City, State, Zip)	Phone	Please Check the Appropriate Boxes	
Patrick Blum	Disability Action Center	3650 N. Gault Way Suite 6 CFA	208 664 9876	<input checked="" type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Disabled	<input type="checkbox"/> American Indian/Alaskan Native <input type="checkbox"/> Asian/Pacific Islander <input type="checkbox"/> Black <input checked="" type="checkbox"/> Hispanic <input type="checkbox"/> White <input type="checkbox"/> Other
Eula Hickman	Habitat for Humanity	176 W. Wyoming Hayden, ID 83835	208-762-4663	<input type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Disabled	<input type="checkbox"/> American Indian/Alaskan Native <input type="checkbox"/> Asian/Pacific Islander <input type="checkbox"/> Black <input type="checkbox"/> Hispanic <input type="checkbox"/> White <input type="checkbox"/> Other
L. Roy B. ...	Group 4 ...	722 E Young St #A CdA, ID.	208-699-6073	<input checked="" type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Disabled	<input type="checkbox"/> American Indian/Alaskan Native <input type="checkbox"/> Asian/Pacific Islander <input type="checkbox"/> Black <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> White <input type="checkbox"/> Other
Kathy Reed	concerned citizen	W. 5730 Highland Dr Cd'A 83814	208-651-4619	<input type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Disabled	<input type="checkbox"/> American Indian/Alaskan Native <input type="checkbox"/> Asian/Pacific Islander <input type="checkbox"/> Black <input type="checkbox"/> Hispanic <input type="checkbox"/> White <input type="checkbox"/> Other
Robert S. Runkle	Trinity Group Homes	PO Box 1861 CdA, ID 83816 - 1861	208-691-2499	<input checked="" type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Disabled	<input type="checkbox"/> American Indian/Alaskan Native <input type="checkbox"/> Asian/Pacific Islander <input type="checkbox"/> Black <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> White <input type="checkbox"/> Other
Cindy Wood	Family Promise	PO Box 3682 CdA ID 83816	(208) 777-4190	<input type="checkbox"/> Male <input checked="" type="checkbox"/> Female <input type="checkbox"/> Disabled	<input type="checkbox"/> American Indian/Alaskan Native <input type="checkbox"/> Asian/Pacific Islander <input type="checkbox"/> Black <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> White <input type="checkbox"/> Other
Laune Rousseau	RI Mental Health		(208) 215-8766	<input type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Disabled	<input type="checkbox"/> American Indian/Alaskan Native <input type="checkbox"/> Asian/Pacific Islander <input type="checkbox"/> Black <input type="checkbox"/> Hispanic <input type="checkbox"/> White <input type="checkbox"/> Other
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				<input type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Disabled	<input type="checkbox"/> American Indian/Alaskan Native <input type="checkbox"/> Asian/Pacific Islander <input type="checkbox"/> Black <input type="checkbox"/> Hispanic <input type="checkbox"/> White <input type="checkbox"/> Other



City of Coeur d'Alene Consolidated Plan

Presented to Citizens of Coeur d'Alene
June 13 & July 19, 2012



Housekeeping

- Are you a resident of Coeur d'Alene?
- Restrooms
- Please Sign-In
- Flyers – Feel free to distribute
- Survey





What Is a Consolidated Plan?

- Collaborative process – unified vision
- Coordinate neighborhood and community development strategies
- Citizen Participation in strategic planning





WHY?

- To identify the City's housing and community development needs, priorities, goals and strategies;
- To stipulate how federal Community Development Block Grant (CDBG) funds will be allocated to housing and community development needs in the community.





Process

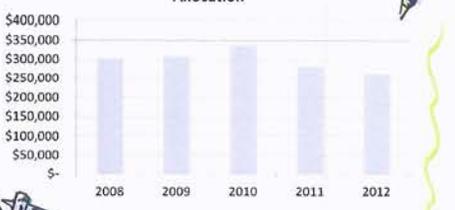
- Citizen Participation
 - Public Meetings
 - Citizen Survey
 - Stakeholder Meeting and Interviews
 - Draft Plan and Comment Period
- Demographic and Socioeconomic Analysis
 - Housing Market Analysis
 - Analysis of Special Needs Populations
 - Fair Housing Analysis
- Five Year Strategic Consolidated Plan





5 YEAR REVIEW

Allocation



Year	Allocation (\$)
2008	300,000
2009	300,000
2010	320,000
2011	280,000
2012	250,000





5 YEAR REVIEW

- Total Amount of CDBG Received for Program Years 2008 through 2012:
\$1,494,719
- Total Amount of leverage from other funding sources:
\$21,437,376




5 YEAR REVIEW

Expenditures

Category	Percentage
Administration	14%
Housing	18%
Community Projects	5%
Sidewalks	22%
Neighborhood Revitalization	41%




CDBG 101

"Most flexible federal program,
but the most complicated"




Objectives

- Benefit to Low and moderate income (LMI) person
- Aid in the prevention of slum and blight
- Meet an urgent need




Two Sides of a Coin



National Objectives:
Approved activities must meet one of the three National Objectives, then it must be an allowable/eligible activity that meets the goals in the Consolidated Plan.



Eligible Activities:
Activities related to housing; (rehabilitation); Real property (acquisition for public use); public facilities and improvements; public service activities for special needs populations; economic development (employment training programs); Planning and Administration



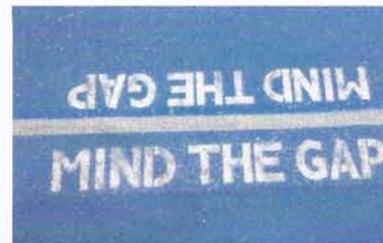

ABSOLUTELY NOT

- Build a City Hall or pay for general operations of a City
- Statue of a Mayor/public official
- Political Activities
- Purchase Equipment




What Potential CDBG Eligible Activities are Most Important?

- New Affordable Housing
- Housing rehabilitation (owner occupied housing)
- Sidewalk repair or replacement
- Property maintenance (e.g., code enforcement)
- Youth center/services
- Senior Services
- Community Centers
- Transitional housing
- Housing for homeless
- Demolition of dilapidated structures (commercial or residential)
- Neighborhood planning
- Economic development – assistance to businesses
- Job creation
- Neighborhood park or recreation improvements



EXISTING GOALS

- 1—Increase supply of for sale housing at prices affordable to city's low to moderate-income workers
- 2—Increase the supply of rental housing affordable to the City's extremely low income renters and residents with special needs, including persons who are homeless
- 3—Improve the City's sidewalks to make them more accessible to persons with disabilities
- 4—Continue with neighborhood revitalization efforts, including code enforcement activities, to improve the condition of housing and commercial properties in low income areas
- 5—Expand higher paying employment opportunities for the residents, through economic development



How Would You Spend the \$\$\$?

You have \$250,000 to improve housing and/or community development conditions for Low and Moderate-Income residents in Coeur d'Alene.

Please use the worksheet we've circulated to identify and prioritize these needs in your community and/or your neighborhood.



How to Participate

- Complete a citizen survey here, at City Hall or online at www.cdaid.org
- Read the draft plan available mid-September and attend the public hearing on December 18
- Send comments in an email to nancy@pacni.org
- Send comments in a letter to:

Nancy Mabile
Panhandle Area Council
11100 N. Airport Drive
Hayden, ID 83835



For More Information

Please visit www.cdaid.org under the community development link to review the 2008-2012 Consolidated Plan, past Action Plans and Reports.





City of Coeur d'Alene Consolidated Plan Workshop

Presented to City Council
September 12, 2012



HUD Entitlement

- Annual grants on a formula basis
- CDBG program provides annual grants to 1209 general units of local government and States
- Idaho grantees:

State of Idaho	City of Lewiston
City of Boise	City of Meridian
City of Coeur d'Alene	City of Nampa
City of Idaho Falls	City of Pocatello




HUD National Objectives

- Benefit to Low and moderate income (LMI) person
- Aid in the prevention of slum and blight
- Meet an urgent need




Two Sides of a Coin





National Objectives:

Approved activities must meet one of the three National Objectives, then it must be an allowable/eligible activity that meets the goals in the Consolidated Plan.

Eligible Activities:

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ABSOLUTELY NOT

- Build a City Hall or pay for general operations of a City
- Statue of a Mayor/Public Official
- Political Activities
- Construction of New Housing




What Potential CDBG Eligible Activities are Most Important?

<ul style="list-style-type: none"> • New Affordable Housing • Housing rehabilitation (owner occupied housing) • Sidewalk repair or replacement • Property maintenance (e.g., code enforcement) • Youth center/services • Senior Services • Community Centers 	<ul style="list-style-type: none"> • Transitional housing • Housing for homeless • Demolition of dilapidated structures (commercial or residential) • Neighborhood planning • Economic development – assistance to businesses • Job creation • Neighborhood park or recreation improvements
---	--




What Is a Consolidated Plan?

- Collaborative process – unified vision
- Coordinate neighborhood and community development strategies
- Citizen Participation in strategic planning



WHY?

- To identify the City's housing and community development needs, priorities, goals and strategies;
- To stipulate how federal Community Development Block Grant (CDBG) funds will be allocated to housing and community development needs in the community.
- Required by HUD every 5 years to receive funding.



Process

- Citizen Participation
 - Public Meetings
 - Citizen Survey
 - Stakeholder Meeting and Interviews
 - Draft Plan and Comment Period
- Demographic and Socioeconomic Analysis
 - Housing Market Analysis
 - Analysis of Special Needs Populations
 - Fair Housing Analysis
- Five Year Strategic Consolidated Plan



OVERVIEW 2008-2012



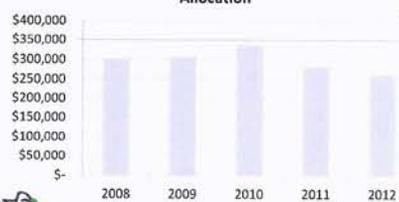
2008-2012

- Goals
- Outcomes (Projects)
- Number Served
- Funding Allocated
- Leverage



5 YEAR REVIEW

Allocation



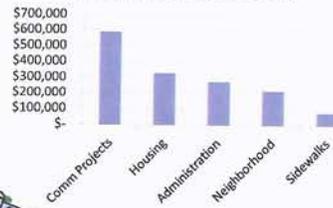
5 YEAR REVIEW

- Total Amount of CDBG Received for Program Years 2008 through 2012: **\$1,469,719**
- Total Amount of leverage from other funding sources: **\$21,611,330**
- # Receiving Assistance to date:
 - 152 new units
 - 347 Persons
 - 3,493 Households



Where Did the Money Go?

2008-2012 CDBG Expenditures



Community Projects

- St. Vincent de Paul Rapid Re-housing
- CAP Homeownership Counseling
- TESH Facility Renovation (Accessibility)
- Habitat for Humanity (4 housing units)
- LCSC Meals-on-Wheels Stove/Oven
- Homestead Avenue Apartments



TESH



Habitat for Humanity



Homestead Avenue



Homestead Avenue



Lake City Senior Center



Housing

- Neider Ave Extension/St. Vincent de Paul
- Mill River Seniors
- Riverstone



Neider/Howard Extension



Neider/Howard Extension



Mill River Senior Housing



Riverstone Affordable Housing

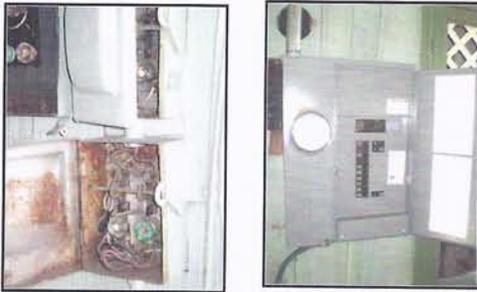


Neighborhood Revitalization

- Code Enforcement
- EMRAP



EMRAP



BEFORE



AFTER

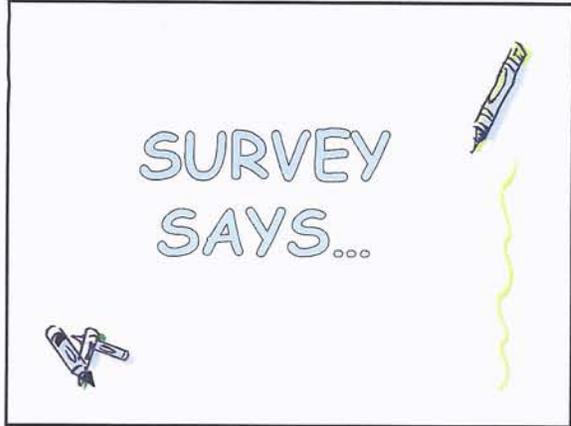


Sidewalks





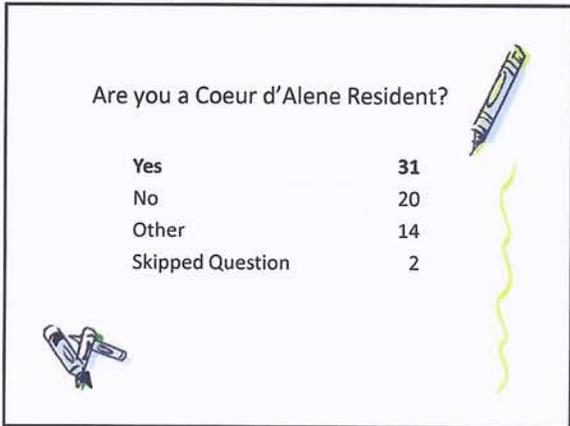
CITIZEN PARTICIPATION



SURVEY SAYS...

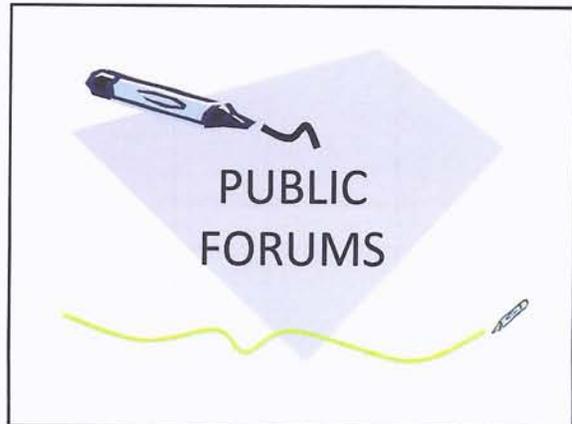
Are you a Coeur d'Alene Resident?

Yes	31
No	20
Other	14
Skipped Question	2



REPRESENTATION	RESPONSE %	RESPONSE COUNT
Citizen (Self)	43.4%	23
Non-Profit Organization	13.2%	7
Service Provider	9.4%	5
Disability Advocate	7.5%	4
Health Care	7.5%	4
Government	5.7%	3
Business/Industry	3.8%	2
Housing Developer	3.8%	2
Real Estate Development	1.9%	1

	HIGH	MED	LOW	NONE
Public Services	50.0%	30.0%	30.0%	10.0%
Substance/Mental Health Services	46.2%	29.0%	15.4%	11.5%
Property Acquisition LMI Benefit	45.1%	18.8%	21.0%	18.7%
Emergency Shelters/Transitional	37.7%	12.1%	17.0%	11.2%
EMRAP	17.2%	51.9%	21.2%	9.6%
Job Training	18.8%	42.3%	19.2%	9.6%
Crime Reduction/Awareness	19.0%	43.1%	25.4%	7.8%
ADA Mods to Public Facilities	29.4%	41.2%	25.5%	3.9%
Code Enforcement	16.0%	34.0%	26.0%	22.0%
Low-Interest Loans-Entrep.	18.8%	32.7%	23.3%	15.4%
Water/Sewer Improvements	10.5%	40.4%	42.6%	6.4%
Housing Downpayment Assistance	17.0%	22.0%	42.0%	24.0%
Rehab of Rental Housing	11.3%	37.3%	37.3%	12.7%
Parks & Recreation Facilities	14.0%	24.0%	36.0%	16.0%



PUBLIC FORUMS



Gaps Identified by Public

- Transportation
- Shelters/Transitional Housing
- Disability Accessibility
- Substance/Mental Abuse
- Low-Interest Loans for Entrepreneurs without much capital
- Homeowner Education

Goal Development

- The Consensus:
 - Keep Goals 1-5
 - Add Public Service Goal

Recommendations

- Retain Goals 1-5 from the existing Consolidated Plan
- Add Objective to Goal 5, Economic Development:
 - Research the feasibility of a low-interest loan program to low and moderate-income entrepreneurs or to retain business that employ low and moderate income workers.

- Add Goal 6:
 - Offer Public Service Program assistance to service organizations supporting low and moderate income residents of Coeur d'Alene

HOW WOULD YOU SPEND COBG DOLLARS?				
ACTIVITY	LOCATION	AMOUNT	ENR	GOAL
Administrative Meeting	Spokane Co. on Website	\$ 500,000	0.0%	1
Build new affordable housing	COA	\$ 500,000	0.0%	1
Build transitional housing projects	St. Vincent COA	\$ 25,000	0.0000000000000000	2
Provide family housing for homeless	COA	\$ 20,000	0.0000000000000000	2
Build & update homeless shelter, intake and location	North Star COA	\$ 20,000	0.0000000000000000	2
Public Facility	Bethel Hospital	\$ 18,000	0.0%	2
Land acquisition for affordable housing	COA	\$ 200,000	0.0%	2, COA 2
Programs to make accessible transportation	Spokane COA	\$ 50,000	0.0%	2
Streetscape	COA	\$ 12,000	0.0%	2
COA	COA	\$ 78,000	0.0%	2
Disability Access/Adaptation, public, transit	Access COA	\$ 50,000	0.0%	2
Make shelters accessible	Women's Shelter & all others	\$ 20,000	0.0000000000000000	2
Programs to make accessible transit & Women's shelters on 1st St.	COA	\$ 200,000	0.0%	2
Begin/Oversee/Reopen All Housing	COA	\$ 50,000	0.0%	2
Homeowner/Disability Rehab	JAF Areas	\$ 78,000	0.0%	2
Deliver self-aiding homes	Spokane COA	\$ 225,000	0.0%	2
REARAP	COA	\$ 30,000	0.0%	2
Mental Health Facility Rehab for Veterans	COA	\$ 30,000	0.0%	2
Construction for 2000/2001/2002	COA	\$ 77,800	0.0%	2
Code Enforcement	Spokane COA	\$ 225,000	0.0%	2
Financing job creation for people with disabilities & minority OS for business	COA	\$ 50,000	0.0%	5
Construction/Leasehold/Building for business projects and other construction		\$ 12,000		NEW GOAL
Public education for mental health/substance abuse & teen th. issue		\$ 20,000	0.0%	4
Mental Health Drug Court/Programs for Mental Health Services		\$ 150,000	0.0%	4
Build mental health mental health & accessible to more housing programs	Spokane etc	\$ 20,000	0.0%	4
Transitional housing programs	St. Vincent COA	\$ 25,000	0.0%	4
High leverage projects		\$ 100,000	0.0%	6/4
Childcare/Child Care		\$ 100,000	0.0%	6/4
Transportation - COA	B. more buses - longer hours	\$ 250,000	0.0%	6/4
Improve Transportation in Area	Spokane County	\$ 50,000	0.0%	6/4
Support for transit expansion	Spokane & City	\$ 78,000	0.0%	6/4

PUBLIC HEARING

CITY OF COEUR D'ALENE
COMMUNITY DEVELOPMENT BLOCK GRANT

2013-2018 CONSOLIDATED PLAN
2013 ANNUAL ACTION PLAN

Consolidated Plan Program Years 2013-2018

Requirement of HUD-CDBG Program

**Identification of housing & community
development needs, priorities, goals
and strategies**

Stipulate how funds will be allocated

Structure

- Executive Summary
- Process (consultation & citizen participation)
- Needs Assessment
- Housing Market Analysis
- Strategic Plan
- Action Plan
- Attachments

The Process

- Over 122 organizations, stakeholders and units of government contacted
- On-Line Citizen Survey (May-July 2012)
- Public Advertisements (June & July 2012)
- Two public forums:
 - June 13 – 2 persons
 - July 19 – 11 persons representing CoC's
- City Council Workshop (September 12, 2012)
- Public Hearing #1 – Citizen Input (December 18, 2012)
- Public Hearing #2 – Council Approval
- HUD Submission – No later than February 13, 2013

Needs Assessment

- Analysis of Housing Problems including Cost Burden, and Crowding
- Summary:
 - Substandard Housing: 0.7% renter and owner (115)
 - Severely Overcrowded: 0.3% renter (55)
 - Overcrowded: 1.2% renter and owner (204)
 - Cost Burden >30% income: 46.2% renter and owner (7,975)
 - Cost Burden >50% income: 15.3% renter and owner (2,630)
- Determination: Cost Burden is the largest housing problem in Coeur d'Alene, solidifying the need of additional affordable housing stock in the City

Housing Market Analysis

- Used 2011 Analysis of Impediments of Fair Housing Choice prepared by BBC Consulting
- Data and narrative provided summarizing Coeur d'Alene's housing stock by number of units, number of vouchers, cost, condition, homeless facilities, special needs facilities and services, affordable housing barriers and non-housing community development assets.

Strategic Plan

- Summary of community development and housing priorities, goals, and strategies for program years 2013 through 2018.
- Priority Needs and Goals based on public input

Priority Needs

	HIGH	MED	LOW	NONE
Public Services	50.0%	4.0%	20.0%	26.0%
Substance/Mental Health Services	46.8%	1.0%	1.0%	51.2%
Property Acquisition LMI Benefit	45.1%	15.2%	21.0%	18.7%
Emergency Shelters/Transitional	37.7%	1.0%	1.0%	60.3%
EMRAP	12.0%	31.0%	36.0%	21.0%
Job Training	10.0%	40.0%	1.0%	49.0%
Crime Reduction/Awareness	10.0%	43.1%	20.0%	26.9%
ADA Modifications to Public Facilities	10.0%	41.8%	2.0%	46.2%
Rehab of Rental Housing	10.0%	37.3%	37.3%	15.4%
Code Enforcement	10.0%	34.0%	1.0%	55.0%
Low -Interest Loans-Entrepreneurs	10.0%	28.7%	13.0%	48.3%
Water/Sewer Improvements	10.0%	1.0%	48.6%	40.4%
Housing Down Payment Assistance	10.0%	1.0%	48.0%	41.0%
Parks & Recreation Facilities	10.0%	1.0%	36.0%	53.0%

2013-2018 Goals

GOAL	NEEDS ADDRESSED
1. Increase for Sale Affordable Housing	Property Acquisition for Benefit of LMI Persons; Water/Sewer Improvements; Sidewalk Repairs/Accessibility
2. Increase Affordable Rental Housing	Property Acquisition for Benefit of LMI Persons; Emergency Shelter/ Transitional Housing; Water/Sewer Improvements; Housing Rehabilitation
3. Sidewalk Accessibility	Sidewalk Repairs/Accessibility
4. Neighborhood Revitalization	ADA modifications to public facilities; Water/Sewer Improvements; Sidewalk Repairs/Accessibility; Crime Reduction/Awareness; Housing Rehabilitation; Code Enforcement
5. Economic Development	Job Training; LMI Business
6. Public Service	Substance Abuse/Mental Health; Crime Reduction/Awareness; Down Payment Assistance; Senior Citizens

Action Plan Program Year 2013

Requirement of HUD-CDBG Program

Stipulate how funds will be allocated

National Objectives

Annual allocation of HUD funds must meet one of the following National Objectives:

- Benefit to Low and moderate income (LMI) person
- Aid in the prevention of slum and blight
- Meet an urgent need

Consolidated Plan Goals

GOAL	OBJECTIVE
1. Increase for Sale Affordable Housing	Increase supply of for sale housing at prices affordable to city's low to moderate income workers
2. Increase Affordable Rental Housing	Increase the supply of rental housing affordable to extremely low income renters/residents with special needs/homeless
3. Sidewalk Accessibility	Improve the City's sidewalks to make them more accessible to persons with disabilities
4. Neighborhood Revitalization	Continue with neighborhood revitalization efforts including code enforcement, to improve the condition of housing and commercial properties in low income areas
5. Economic Development	Expand higher paying employment opportunities for the residents, through economic development
6. Public Service	Public Service Activities other than Low/Moderate Income Housing

Action Plan Budget – PY 2013

GOAL	%	ALLOCATION	PROJECT
Administration	20.0%	\$48,600	Contract for Administration; Advertisements; Publications; Brochures; Training; Consolidated Plan Update
1- Increase Housing for Purchase	44.0%	\$106,833	Land Acquisition for LMI housing (106 Homestead Avenue)
2- Increase housing for Rent	0.0%	\$0	No current projects identified.
3- Sidewalks	10.2%	\$25,000	Sidewalk repair/replacement within LMI Census Tract areas
4- Neighborhood Revitalization	15.2%	\$40,000	Assist LMI homeowners to correct conditions that threaten health & safety or soundness of their home.
5- Economic Development	0.0%	\$0	No current projects identified.
6- Public Service	9.3%	\$22,567	Public Service Program assistance to service organizations supporting LMI residents
TOTAL	100%	\$243,000	

Public Comments Council Questions

Council Action

- Approval of the CDBG 2013-2018 Consolidated Plan and the Plan Year 2013 Action Plan estimated in the amount of \$243,000.

Thank You!

Please visit www.cdaid.org under the community development link to review the 2013-2018 Draft Consolidated Plan, 2008-2012 Consolidated Plan, past Action Plans and Reports.

Questions or Comments:

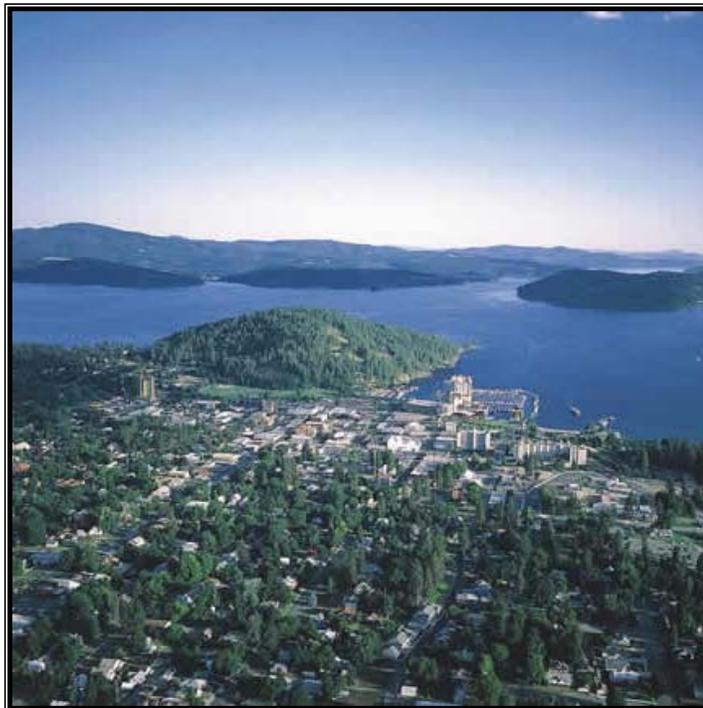
Renata McLeod, renata@cdaid.org
 Nancy Mabile, nancy@pacni.org
 Sherri Wastweet, swastweet@pacni.org

ATTACHMENT 3
2011 Analysis of Impediments
To Fair Housing Choice

Final Report

2011 Analysis of Impediments to Fair Housing Choice

City of Coeur d'Alene, Idaho



Final Report

June 20, 2011

**2011 Analysis of Impediments
to Fair Housing Choice**

Prepared for

City of Coeur d'Alene
710 E. Mullan Avenue
Coeur d'Alene, ID 83814

Prepared by

BBC Research & Consulting
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Denver, Colorado 80209-3868
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www.bbcresearch.com
bbc@bbcresearch.com

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SECTION I.
Introduction

SECTION I.

Introduction

In 2010, BBC Research & Consulting was contracted by the City of Coeur d'Alene to update the city's Analysis of Impediments to Fair Housing Choice (AI), with an emphasis on the city's housing market and overall affordability. The city's previous AI and housing market study were completed by BBC in 2007.

Fair Housing Act

The Federal Fair Housing Act, passed in 1968 and amended in 1988, prohibits discrimination in housing on the basis of race, color, national origin, religion, gender, familial status and disability. The Fair Housing Act covers most types of housing including rental housing, home sales, mortgage and home improvement lending, and land use and zoning. Excluded from the Act are owner-occupied buildings with no more than four units, single family housing sold or rented without the use of a real estate agent or broker, housing operated by organizations and private clubs that limit occupancy to members, and housing for older persons.¹

HUD has the primary authority for enforcing the Fair Housing Act. HUD investigates the complaints it receives and determines if there is a "reasonable cause" to believe that discrimination occurred. If reasonable cause is established, HUD brings the complaint before an Administrative Law Judge. Parties to the action can also elect to have the trial held in a federal court (in which case the Department of Justice brings the claim on behalf of the plaintiff).²

Analysis of Impediments Overview

An Analysis of Impediments to Fair Housing Choice is a U.S. Department of Housing & Urban Development (HUD) mandated review of impediments to fair housing choice in the public and private sector. The AI is required for Coeur d'Alene to receive federal housing and community development block grant funding.³

The AI involves:

- A review of a city's laws, regulations, and administrative policies, procedures and practices;
- An assessment of how those laws, policies and practices affect the location availability and accessibility of housing; and
- An assessment of public and private sector conditions affecting fair housing choice.

¹ This is a very general description of the Fair Housing Act and the actions and properties covered by the Act. For more detailed information on the Fair Housing Act, please see the full text, which can be found on the U.S. Department of Justice's website, www.usdoj.gov/crt/housing/title8.htm.

² "How Much Do We Know? Public Awareness of the Nation's Fair Housing Laws", The U.S. Department of Housing and Urban Development, Office of Policy and Research, April 2002.

³ The city is also required to submit a Consolidated Plan for Housing and Community Development and an annual performance report to receive CDBG funding each year. These reports were prepared separately from the AI and are available from the city.

According to HUD, impediments to fair housing choice are:

- Any actions, omissions, or decisions *taken because of* race, color, religion, sex, disability, familial status or national origin that restrict housing choices or the availability of housing choices.
- Any actions, omissions or decisions that have the effect of restricting housing choices or the availability of housing choices *on the basis of* race, color, religion, sex, disability, familial status or national origin.

HUD guidance. HUD has recently released brief guidance to communities about the department's expectations of AIs. In this guidance, HUD clarifies that "affordable housing, in and of itself, is not an impediment to fair housing unless it creates an impediment to housing choice because of membership in a protected class." Despite this guidance, this report examines the presence and quality of affordable housing in Coeur d'Alene to ensure that its residents are able to find suitable housing.

HUD further defines fair housing choice as "the ability of persons of similar incomes to have available to them the same housing choices regardless of race, color, religion, sex, disability, familial status or national origin. Policies, practices or procedures that appear neutral on their face but operate to deny or adversely affect the provisions of housing to persons (in any particular protected class) may constitute such impediments."

Methodology

Data and information gathered for this report were collected both from existing data sources (secondary), as well as through a survey effort (primary) targeted towards Coeur d'Alene residents and stakeholders serving sensitive populations within the city.

Secondary data. A number of data sources and organizations were relied upon during the completion of this AI and housing market study to provide updated information on fair housing and overall housing affordability in Coeur d'Alene. These sources and organizations include the following:

- 2009 Census population estimates;
- 2007-2009 American Community Survey 3-year estimate (ACS);⁴
- 2010 Claritas, a private data provider;
- 2009 Home Mortgage Disclosure Act (HMDA) public loan data;
- Department of Housing and Urban Development (HUD) Income Limits;
- Idaho Housing and Finance Association (IHFA);
- Department of Justice Civil Rights Division; and
- National Fair Housing Advocate.

⁴The ACS also produces 1-year estimates for communities greater than 65,000 residents.

Primary data. A resident and stakeholder survey were conducted with two primary objectives:

- To help identify fair housing barriers associated with private market activity that may not be captured by quantitative research; and,
- To obtain updated resident and stakeholder input about the local housing market as it relates to housing costs, housing quality and housing satisfaction.

Both surveys were available in paper and online formats between December 15, 2010 and January 15, 2011. A total of 51 residents participated in the resident survey. A total of 27 stakeholders representing 20 organizations serving Coeur d'Alene residents participated in the stakeholder survey. Findings from the 2011 resident survey are compared with the findings from the survey conducted in 2007 when possible.

Report Outline

The remainder of the report is made up of the following sections:

- Section II. Demographic Analysis. This section provides information on population, income, race and ethnicity, familial status and disability to help understand the prevalence of persons protected under fair housing law.
- Section III. Housing Market Analysis. This section examines the current housing market, as well as overall affordability in the city. This section also compares the housing market in 2011 to the market in 2007, when BBC completed a similar study for the city. This section concludes updating recommendations from the 2007 housing market study.
- Section IV. Analysis of Impediments to Fair Housing Analysis. Section IV updates research used to analyze the presence of housing discrimination in the city. Information in this section includes a discussion of the resident and stakeholder surveys, a zoning and land use review,⁵ a review of affordable housing in Coeur d'Alene, a fair lending analysis and a legal analysis to better understand the types of fair housing legal cases that have occurred in and around Coeur d'Alene.
- Section V. Impediments and Fair Housing Action Plan. Section V first identifies fair housing impediments in Coeur d'Alene and then identifies a plan to address the impediments.

5

SECTION II.

Demographic Analysis

SECTION II.

Demographic Analysis

This section contains an analysis of Coeur d'Alene's demographic composition and employment opportunities.

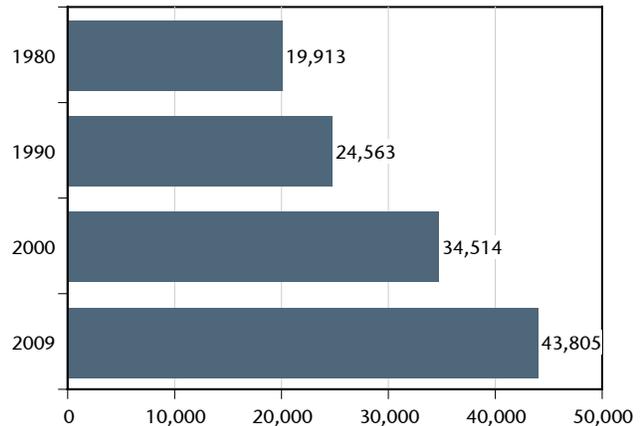
Demographics

The following section examines the prevalence of persons protected under fair housing law, as well as the geographic distribution of these residents within the city. Population, income, race and ethnicity, familial status and disability are examined in greater detail.

Population. Since 1980, Coeur d'Alene has added nearly 24,000 new residents for a 2009 population of 43,805. New residents have been attracted to the city in part by the city's physical beauty; its proximity to recreation and the lake; and the combination of urban amenities and small town atmosphere.¹ Since 1980, Coeur d'Alene's population has grown by 120 percent, which outpaced the State of Idaho's 64 percent population growth for the same time period.

Figure II-1.
Population Change, City of Coeur d'Alene, 1980 to 2009

Source:
U.S. Census (1980, 1990, 2000) and
Census Population Estimates (2009).

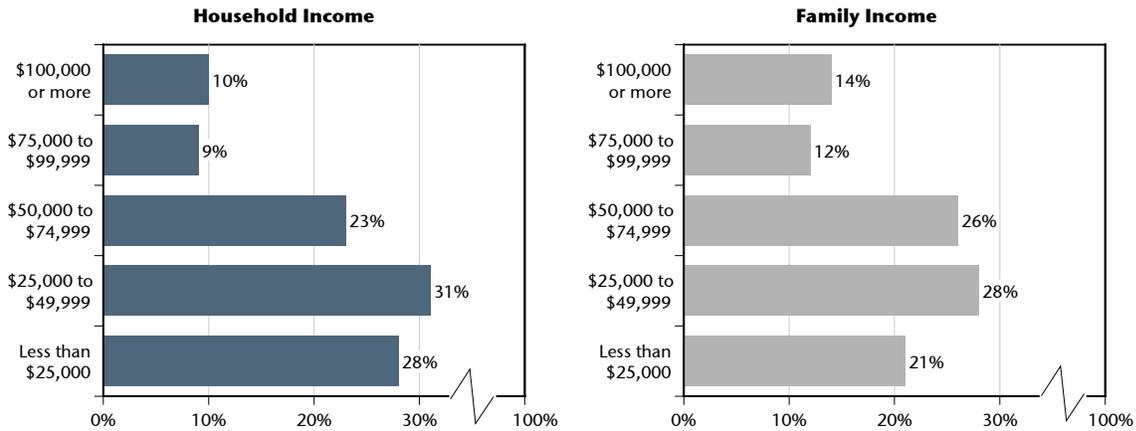


Income. The median *household* income in 2009 was \$40,931, indicating that half of the city's households earned more than \$40,931 and half earned less. The city's median *family* household was a higher \$51,427.

Figure II-2 displays the city's household and family income distributions in 2009. As seen in the figure, both household and family annual earnings are clustered between \$25,000 and \$75,000.

¹ 2011 Coeur d'Alene Resident Survey response to the question "What are the best things about living in Coeur d'Alene?"

Figure II-2.
Family and Household Income Distribution, Coeur d’Alene, 2009



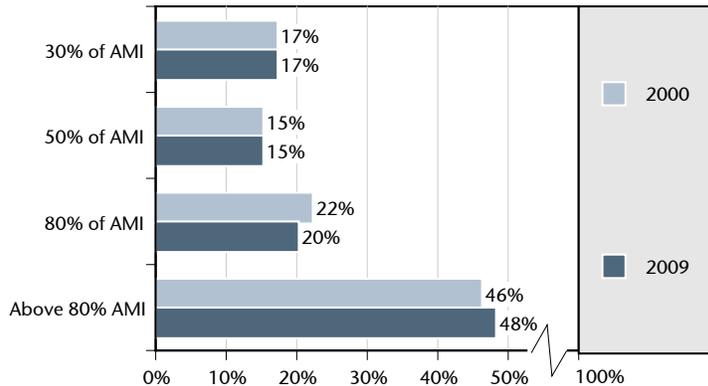
Source: 2007-2009 American Community Survey 3-year estimate.

Household income analysis for program planning purposes is based on the Median Income (MFI) as established by the U.S. Department of Housing and Urban Development. Figure II-3 compares the income distribution of households in 2000 and 2009 against HUD’s MFI. The 2000 MFI in Coeur d’Alene was \$44,700, and the 2009 MFI was \$55,100.² The following classifications were used: extremely low income (earning less than 30 percent of the MFI), low income (earning 31 to 50 percent of MFI), moderate income (earning 51 to 80 percent of MFI) and middle-/upper income (earning 81 percent and higher of MFI).

Since 2000, the percentage of extremely low-, low- and moderate income households remained unchanged. Conversely, the proportion of middle-/upper income households in the city grew.

Figure II-3.
Household Income by AMI, Coeur d’Alene, 2000 and 2009

Source: 2007-2009 American Community Survey 3-year estimate and HUD 2009 Income Limits.

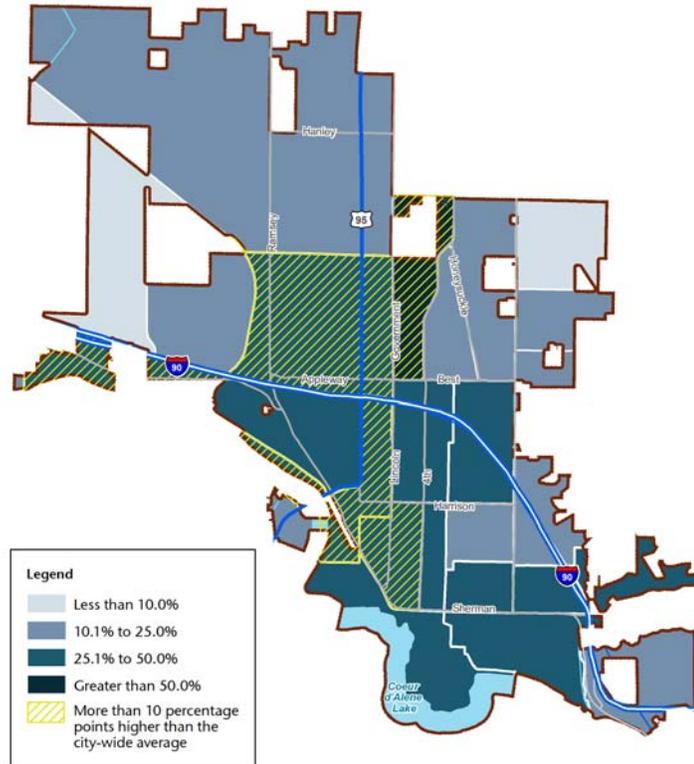


² The 2010 MFI for the Coeur d’Alene MSA was not used to stay consistent with demographic data used in this analysis.

Figure II-4 displays the percentage of low income households (households earning less than \$25,000 per year) by Census block group. Twenty-eight percent of the city’s households earn less than \$25,000 per year. The crosshatched block groups indicate geographic concentrations of low income residents. For the purposes of this study, concentrations are defined as areas with 10 percentage points or more than the city-wide average, which is consistent with HUD’s definition of disproportionate need.

**Figure II-4.
Geographic Distribution of Low
Income Households by Block
Group, Coeur d’Alene, 2010**

Source:
Caritas 2010.



Race and ethnicity. One of the key components of fair housing analysis is an examination of the concentration of racial and ethnic minorities within a jurisdiction to detect evidence of segregation. In some cases, minority concentrations are a reflection of preferences—e.g., minorities may choose to live where they have access to grocery stores or restaurants that cater to them. In other cases, minority populations are intentionally steered away or discouraged from living in certain areas. Housing prices can also heavily influence where minorities live.

Coeur d’Alene lacks the racial and ethnic diversity seen in larger urban communities. Its population is primarily comprised of white and non-Hispanic residents. However, since 2000, the community has become more diverse, primarily due to the growth in the Hispanic population. In 10 years, the Hispanic population more than doubled in the city and now contributes 4 percent of the city’s population, compared with 2 percent in 2000.

**Figure II-5.
Population by Race and
Ethnicity, Coeur d'Alene,
2000 and 2009**

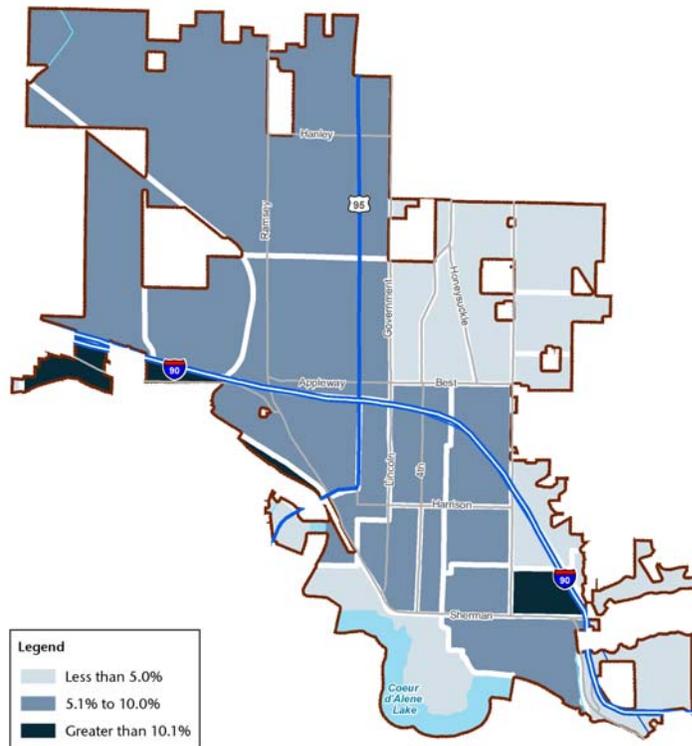
Source:
U.S. Census Bureau, 2000 and 2007-2009 American
Community Survey 3-year estimates.

	Number		Percent	
	2000	2009	2000	2009
Race				
African American	79	232	0%	1%
American Indian	303	449	1%	1%
Asian	239	60	1%	0%
Native Hawaiian	16	33	0%	0%
White	33,059	40,848	95%	95%
Some other race	290	109	1%	0%
Two or more races	799	1,225	2%	3%
Ethnicity				
Hispanic	755	1,778	2%	4%
Non-Hispanic	34,030	41,178	98%	96%

Figures II-6 through II-8 show where the city's largest minority groups are located within Coeur d'Alene. After applying the same definition of concentration used for low income households, no racial or ethnic concentrations were identified in Coeur d'Alene. Additionally, the city's minority residents are located throughout the city.

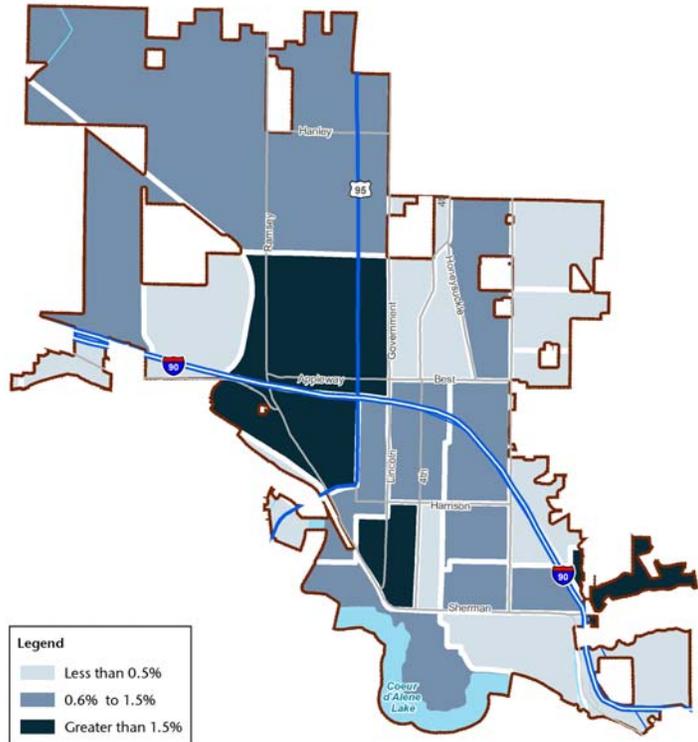
**Figure II-6.
Percent of Block Group
Population that is
Non-White by Block Group,
Coeur d'Alene, 2010**

Source:
Claritas 2010.



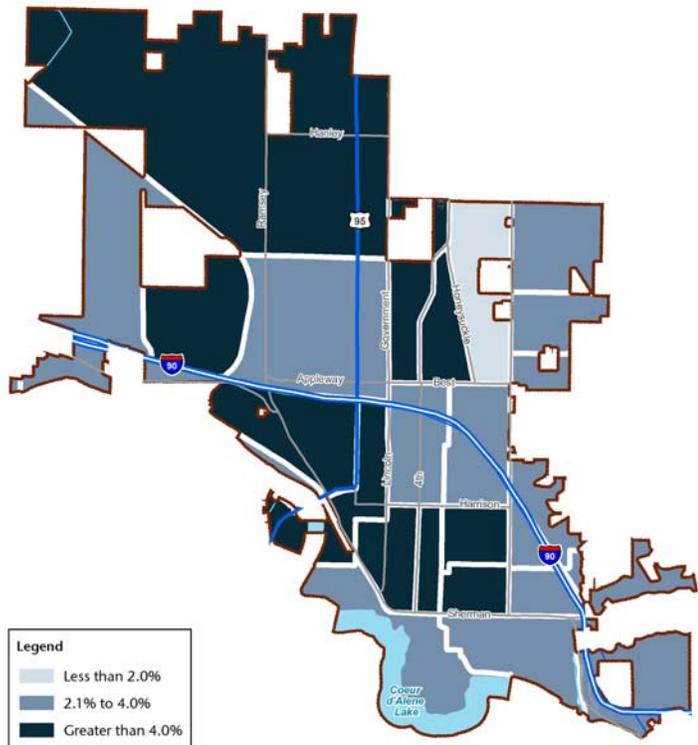
**Figure II-7.
Percent of Population that is African American by Block Group, Coeur d'Alene, 2010**

Source:
Claritas 2010.



**Figure II-8.
Percent of Population that is Hispanic by Block Group, Coeur d'Alene, 2010**

Source:
Claritas 2010.

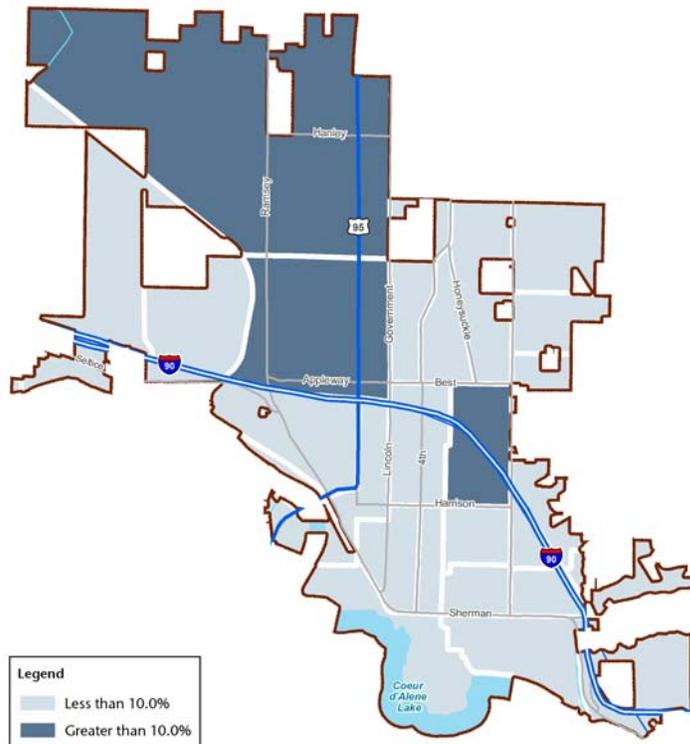


Familial status and disability. Single parents and persons with disabilities may also experience fair housing discrimination and/or have greater challenges in finding affordable and appropriate housing.

As of 2009, an estimated 2,073 households in Coeur d'Alene were single-parent families. This represents about 12 percent of all households in the city. Most of these households (1,732) were female-headed. Figure II-9 shows where female-headed households reside in the city. Overall, 10 percent of households are female-headed with children.

Figure II-9.
Proportion of Female-Headed Households in Block Group, Coeur d'Alene, 2010

Source:
Claritas 2010.



Many persons with disabilities require housing that has accessibility features, is near public transit and supportive services, and is affordable. Persons with disabilities are also at greater risk of experiencing housing discrimination, oftentimes due to a lack of knowledge about laws governing accommodations for the disabled.

Updated information on disability status is not available in the 2007-2009 American Community Survey 3-year estimate. The most recent disability information from the 2000 Census was presented as part of the city's 2007-2012 HUD Consolidated Plan. According to the Consolidated Plan:

The Census reported that 20 percent of residents of Coeur d'Alene had a disability in 2000, compared to 18 percent nationwide with a disability. An estimated 6,257 persons in Coeur d'Alene had some type of disability in 2000. In 2006, the number is likely closer to 8,500, reflecting the City's growth overall.

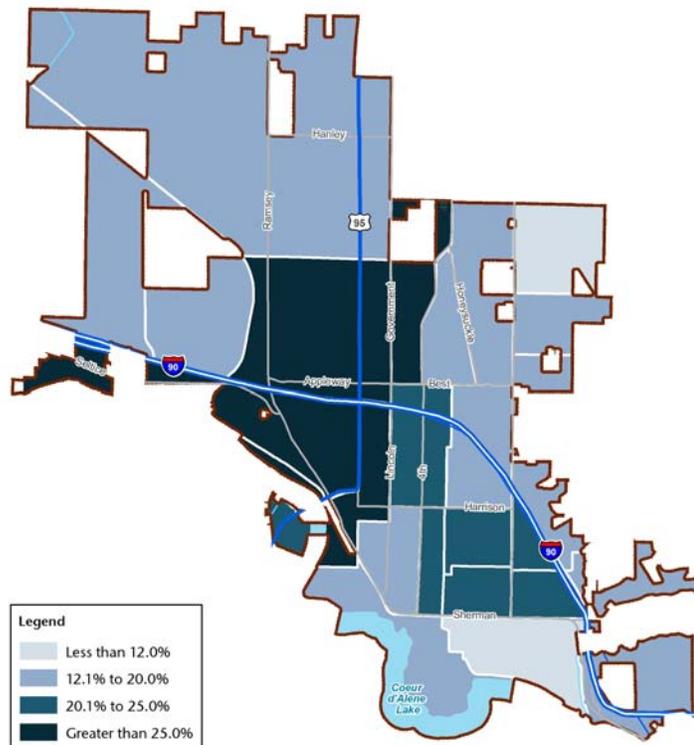
The Census's definition of disability status is based on individual answers to several Census survey questions. According to the Census, individuals have a disability if any of the following three conditions are true: (1) they were 5 years old and over and had a response of "yes" to a sensory, physical, mental or self-care disability; (2) they were 16 years old and over and had a response of "yes" to going outside the home disability; or (3) they were 16 to 64 years old and had a response of "yes" to employment disability.

The most common types of disabilities that residents of Coeur d'Alene had in 2000 were physical (25 percent), difficulty "going outside the home" (18 percent), and sensory (13 percent) and mental (16 percent). Seven percent of disabilities were related to the inability to care for oneself without assistance.

Figure II-10 shows where persons with disabilities lived in Coeur d'Alene in 2000. Block groups with the largest proportion of persons with disabilities are located in the central portion of the city.

Figure II-10.
Concentrations of Persons with Disabilities, Coeur d'Alene, 2000

Source:
U.S. Census Bureau, 2000 Census.



Employment

According to the Idaho Department of Labor, jobs in the public administration, retail trade and health care/social assistance industries comprise nearly 50 percent of all jobs in Kootenai County. All three industries pay modest wages, with annual earnings for full-time employment falling between \$25,000 and \$35,000 annually. On average, a full-time worker in Kootenai County would expect to earn \$31,000 annually. Figure II-11 presents the county's overall employment and wage distribution for the 1st quarter of 2010.

Figure II-11.
Employment and Wage Distribution by Industry, Kootenai County, 1Q10

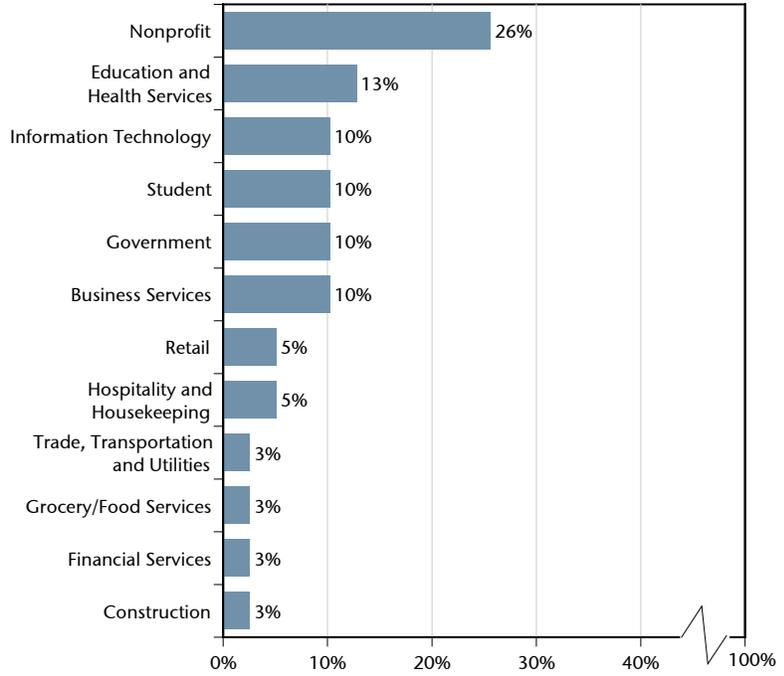
	Average Employment	Percent of Total Employment	Average Weekly Wages	Average Annual Full-Time Salary
Agriculture, Forestry, Fishing and Hunting	199	0.4%	\$ 591	\$ 30,731
Construction	3139	6.4%	\$ 603	\$ 31,379
Manufacturing	3901	8.0%	\$ 653	\$ 33,941
Wholesale Trade	1378	2.8%	\$ 831	\$ 43,223
Retail Trade	7339	15.0%	\$ 465	\$ 24,186
Transportation and Warehousing	642	1.3%	\$ 547	\$ 28,465
Utilities	279	0.6%	\$ 1,226	\$ 63,741
Information	723	1.5%	\$ 837	\$ 43,542
Finance and Insurance	2240	4.6%	\$ 831	\$ 43,202
Real Estate and Rental and Leasing	629	1.3%	\$ 645	\$ 33,518
Professional, Scientific and Technical Services	2102	4.3%	\$ 788	\$ 40,985
Management of Companies and Enterprises	281	0.6%	\$ 1,930	\$ 100,340
Administrative and Waste Management	3319	6.8%	\$ 370	\$ 19,262
Educational Services (private ownership)	336	0.7%	\$ 448	\$ 23,291
Health Care and Social Assistance	6089	12.5%	\$ 563	\$ 29,269
Arts, Entertainment and Recreation	792	1.6%	\$ 411	\$ 21,363
Accommodation and Food Services	4734	9.7%	\$ 256	\$ 13,288
Other Services (except Public Administration)	1066	2.2%	\$ 427	\$ 22,204
Public Administration and Education	9618	19.7%	\$ 685	\$ 35,644

Source: Idaho Department of Labor.

Figure II-12 presents the employment categories of the resident survey participants. Nonprofit employment was the most represented in the survey. The remaining responses captured prevalent industries in the city, such as health services and government.

Figure II-12.
Employment Category of
Survey Participants,
Coeur d'Alene, 2011

Source:
COEUR D'ALENE Resident Survey, 2011.



SECTION III.
Housing Market Analysis

SECTION III.

Housing Market Analysis

In 2007, BBC completed an in-depth housing market study for the City of Coeur d’Alene, which included a series of recommendations to help the city meet existing housing needs for its residents. This section provides updated information on the city’s housing market and examines and updates recommendations from 2007.

Housing Market Overview

The following presents a broad overview of the city’s current housing market by discussing the city’s rental market, as well as its for sale housing market.

The following questions help guide this discussion of the city’s housing market:

- *How much do housing units cost in Coeur d’Alene?*
- *How challenging is it to find housing opportunities in Coeur d’Alene?*
- *Are residents satisfied with their current living situation?*

Rental market. According to the ACS, 43 percent of the city’s households rent their current home. With renters comprising nearly half of the city’s households, the availability of quality and affordable rental housing is important to attract and retain the city’s workforce, students and persons who simply prefer renting over owning.

Rental costs. The ACS reported a 2009 median contract rent (without utilities) in Coeur d’Alene of \$642 and a median gross rent (with utilities) of \$773. The resident survey produced a higher median contract rent of \$800 and a median gross rent of \$870.

As seen in Figure III-1, most rental units in 2009 were priced between \$500 and \$750, which is a shift from 2000 when more than half of the city’s rental units required rents of \$500 or less. Additionally, in 2000, less than 10 percent of the rental units in the city required rents of \$750 or more; currently, 35 percent of the city’s rental units rent for \$750 or more per month.

Figure III-1.
Contract Rent Distribution,
Coeur d’Alene, 2000 and 2009

Source:
 U.S. Census Bureau, 2000 and 2007-2009 American
 Community Survey 3-year estimates.

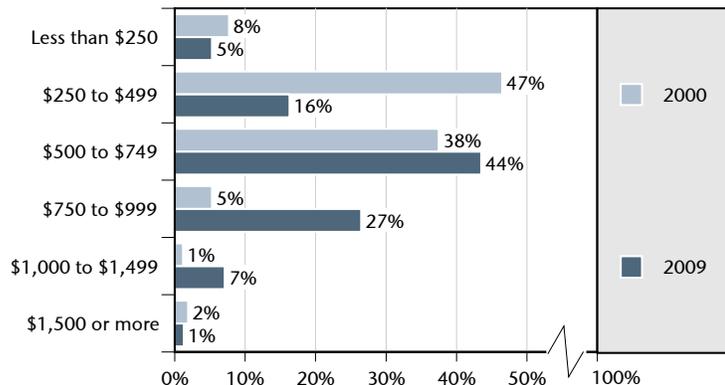
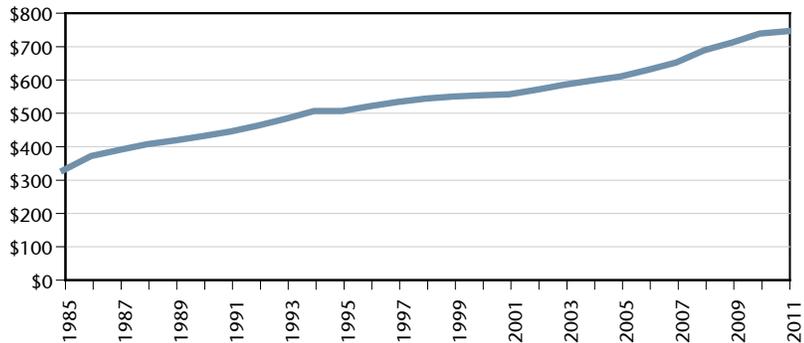


Figure III-2 further demonstrates increases in the city’s rental rates. Fair Market Rents (FMR) are established annually by HUD to determine the subsidy that households are eligible to receive under subsidized programs.

Figure III-2.
Trends in Fair Market Rents for Two-Bedroom Units, Coeur d’Alene, 1985 to 2011

Source:
 U.S. Department of Housing and Urban Development.



The largest increase occurred between 2007 and 2008, when the FMR for the MSA increased by 4 percent from \$646 to \$683. The FMR for a 2-bedroom unit is currently \$740.

Between 2005 and 2011, the FMR in Coeur d’Alene increased by 23 percent. The FMR in Coeur d’Alene increased faster than other Idaho and regional cities, with the exception of Boise.

Figure III-3
Fair Market Rents for Two-Bedroom Units Comparison, Coeur d’Alene, 2005 and 2011

Source:
 U.S. Department of Housing and Urban Development.

	2005	2011	Percent Change
Coeur d’Alene	604	740	22.5%
Boise	520	702	35.0%
Missoula	624	775	24.2%
Pocatello	593	624	5.2%
Spokane	614	731	19.1%

Rental rate increases have been met by increased renter income. As seen in Figure III-4, the median income of renter households increased by 34 percent since 2000, growing from \$22,037 in 2000 to \$29,559 in 2009. This increase in median household income is mirrored by the 32 percent increase in median rent.

Figure III-4.
Contract Rent Distribution, Coeur d’Alene, 2000 and 2009

Source:
 U.S. Census Bureau, 2000 and 2007-2009 American Community Survey 3-year estimates

	2000	2009	Percent Increase
Median Contract Rent	\$ 487	\$ 642	31.8%
Median Renter Household Income	\$ 22,037	\$ 29,559	34.1%

Locating rental units. Approximately half of renters participating in the survey thought it was difficult to find rental opportunities in Coeur d’Alene, primarily because rental units affordable in their price range were in poor condition. Renters that found it difficult to find quality rental units in their price range currently pay between \$625 and \$800 per month in rent, which aligns with the city’s overall median rental rate.

According to the resident survey, renters should allow two to four weeks to find a rental unit in Coeur d'Alene. Survey participants relied on a variety of outlets to locate their current apartment including online resources (e.g., Craigslist), word of mouth, and seeing "for rent" signs in front of available properties.

Renter satisfaction. Renters emphasized the importance of proximity to important amenities and services, as well as overall quality when selecting a unit to rent.¹ As such, 78 percent of renter survey respondents said they were "satisfied" with their current living situation, likely because their current homes met these criteria. Nearly all renters stated that no necessary repairs were necessary in their rental unit.²

Not all renters want to become homeowners; however, homeownership may be a challenge in Coeur d'Alene for those that do want to become homeowners. According to the renters, the costs and financial stability associated with homeownership (e.g., homeownership, low income, poor credit, lost home in short sale) are current barriers to homeownership.

Homeownership market. According to the ACS, the 2009 median value of owner occupied homes in Coeur d'Alene was \$207,000, which is 22 percent higher than the \$170,000 sales price survey respondents would expect to receive if they sold their home.³ Both statistics likely understate the affordability of homes in Coeur d'Alene for interested homebuyers. One source cites the median sales price of current listings in Coeur d'Alene as \$258,219 and the average as \$561,329.⁴

The value of owner-occupied housing units increased since 2000. More than 80 percent of the city's owner-occupied housing stock was valued at \$150,000 or less in 2000; currently, only one in five units is valued at the same price. For homebuyers seeking homes valued at \$500,000 or more, their options have increased in the last 10 years. Currently, 4 percent of the city's owner occupied homes are valued at \$500,000 or more, compared with less than 1 percent in 2000.

¹ Fifty-five percent of renters said that proximity to important amenities and services was important in selecting their current home. Forty-four percent said that the quality of the home was important in selecting their current home. These were the two most commonly cited responses.

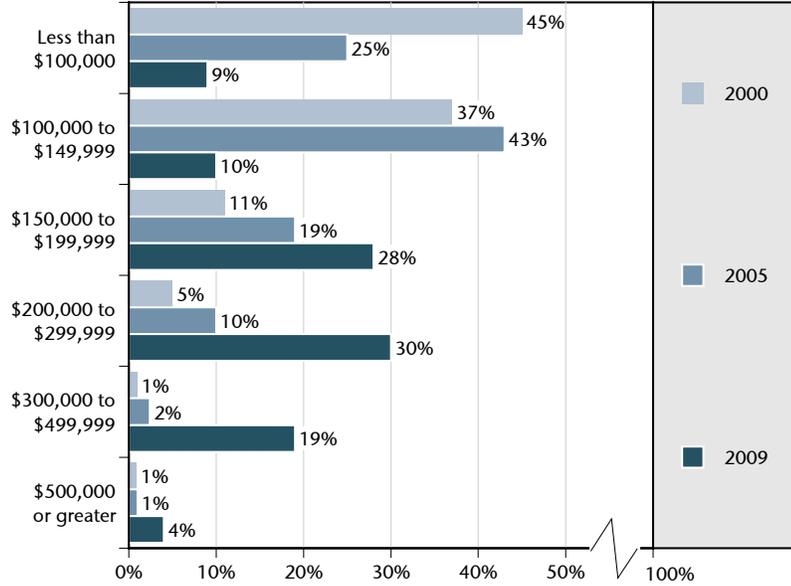
² Eighty-nine percent of renters said that there were no repairs needed on their current rental unit.

³ Excludes mobile homes.

⁴ <http://www.americantowns.com/id/coeurdalene-real-estate>

Figure III-5.
Values of Owner-Occupied Housing Units, Coeur d'Alene, 2000, 2005 and 2009

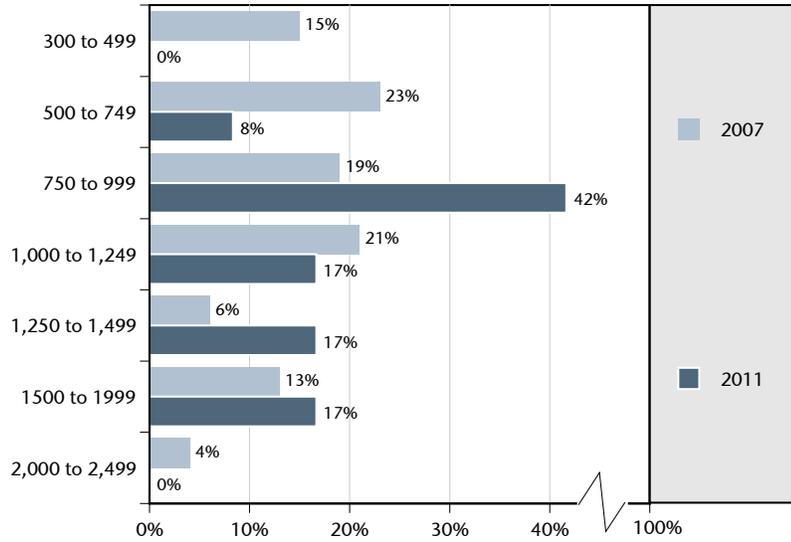
Source:
 U.S. Census Bureau, 2000, Claritas, 2005
 and 2007-2009 American Community
 Survey 3-year estimates



In the 2007 resident survey, homeowners reported their monthly mortgage costs. Homeowners in 2007 paid between \$500 and \$1,250 to service their mortgage debt. That has since changed. Figure III-6 compares the costs reported by residents in 2007 and 2011. The 2011 resident survey captured more residents paying between \$750 to \$999 per month to service their mortgage, as well as a larger proportion of homeowners paying greater than \$1,250 per month.

Figure III-6.
Homeownership Costs, Coeur d'Alene, 2007 and 2011

Source:
 2007 and 2011 BBC Resident Surveys, Coeur
 d'Alene Consolidated Plan.



Foreclosure and negative equity are two realities faced by many homeowners across the country. However, for homeowners participating in the resident survey, home foreclosure was not a concern.⁵ Conversely, 28 percent of homeowners do believe they owe more on their home than it is currently worth. For residents with negative equity, refinancing is often the most desirable option to avoid a short sale or foreclosure, which makes access to mortgage capital crucial.

⁵ 95 percent of homeowners participating in the survey were not concerned about their home going into foreclosure.

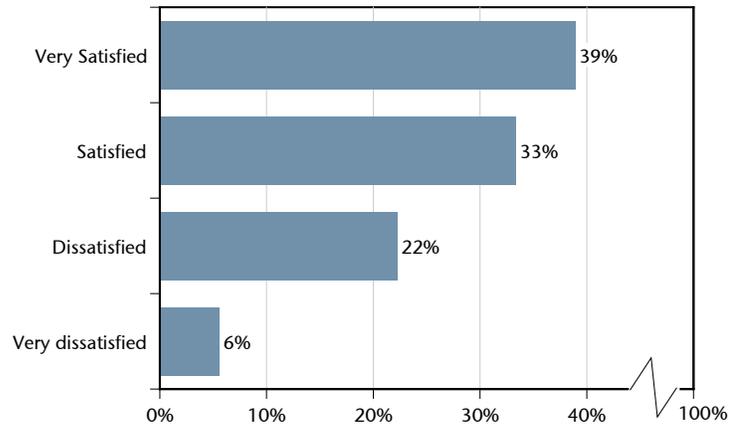
Per the resident survey, homeowner satisfaction isn't as apparent as renter satisfaction. Approximately one-quarter of homeowners participating in the resident survey said they were either "dissatisfied" or "very dissatisfied" with their current living situation.

Figure III-7.

Response to the Question:

Would you say you are generally satisfied with your current home?

Source:
COEUR D'ALENE Resident Survey, 2011.



When asked why they were dissatisfied with their current home, residents primarily cited quality, the value/cost of their home and its size. These are summarized in greater detail below.

- Quality. Some residents stated that their homes were in need of repairs (e.g., new siding, new roof) and that the overall quality was poor.
- Value and cost of their home. Residents seemed disappointed that their homes were worth less than what they owed on their mortgage and that they simply paid too much when they purchased the home. Additionally, some seemed upset at the quality of their home versus the cost they paid to purchase it.
- Size. Some residents simply wanted more space because their current home was not adequately sized.

Homeowners were asked whether there were necessary repairs that needed to be made to their homes. Of those homeowners that responded to the question, 44 percent have repairs they need to make to their home, which is nearly the same response rate received in 2007 (46 percent) to the same question. New roofs, siding, windows, flooring, door and general energy efficiency improvements were all cited by homeowners as necessary repairs.

In 2007, 3 owners, or 6 percent of the homeowners responding to the survey who needed repairs, said that the repairs were so significant that they made their homes "unlivable." This was equivalent to about 3 percent of all homeowners in the City, or approximately 500 households. In 2011, none of the homeowners said that their repairs made their homes "unlivable".

Housing Affordability

The analysis in this section examines housing need across all income levels to identify mismatches in supply and demand for all households in Coeur d’Alene. It reports the results of a modeling effort called a “gaps analysis”, which compares housing affordability for households at different income levels to the supply of housing units affordable at these income levels.

Defining affordability. In the housing industry, housing is “affordable” if no more than 30 percent of a household’s monthly income is needed for rent, mortgage payments and utilities. When the proportion of household income needed to pay housing costs exceeds 30 percent, a household is considered “cost burdened.” This definition was used in the analysis discussed below.

Summary of housing needs. Coeur d’Alene’s renters and homeowners have experienced increases in housing costs, which have exacerbated the housing needs of the city’s lowest income residents. More specifically, these needs include the following:

Figures III-8 and III-9 display the results of the gaps analysis for the city. Figure III-8 presents analysis for renters seeking rental opportunities in the city. Figure III-9 presents analysis for renters seeking homeownership.

**Figure III-8.
Rental Gap, Coeur d’Alene, 2011**

Income Range	Renters		Maximum Affordable Rent	Total Rental Units and Vouchers		Rental Gap	
	Number	Percentage		Number	Percentage		
\$0	\$4,999	284	4%	\$ 75	183	2%	-101
\$5,000	\$9,999	539	7%	\$ 175	435	5%	-104
\$10,000	\$14,999	998	13%	\$ 300	133	2%	-865
\$15,000	\$19,999	656	9%	\$ 425	274	3%	-382
\$20,000	\$24,999	611	8%	\$ 525	1,183	15%	572
\$25,000	\$34,999	1,298	17%	\$ 775	3,256	41%	1,958
\$35,000	\$49,999	1,213	16%	\$ 1,150	2,062	26%	849
\$50,000	\$74,999	1,174	16%	\$ 1,750	328	4%	-846
\$75,000	\$99,999	331	4%	\$ 2,375	79	1%	-252
\$100,000	\$149,999	230	3%	\$ 3,600	0	0%	-230
\$150,000 or more		107	1%	\$ 4,825	0	0%	-107
Total		7,441	100%		7,933	100%	

Source: BBC Research & Consulting.

**Figure III-9.
Renter to Homeowner Gap, Coeur d’Alene, 2011**

Income Range	Renters		Maximum Affordable Home Price	Estimated Housing Units	Percent All Units	Cumulative Percentage Available	Units Available per Renter Household	Difference in Proportions	
	Number	Proportion							
\$0	\$4,999	284	4%	\$ 5,092	1	0%	0%	0.00	-4%
\$5,000	\$9,999	539	7%	\$ 20,362	6	1%	1%	0.01	-6%
\$10,000	\$14,999	998	13%	\$ 45,820	19	3%	4%	0.02	-10%
\$15,000	\$19,999	656	9%	\$ 71,279	14	2%	6%	0.02	-7%
\$20,000	\$24,999	611	8%	\$ 96,738	20	3%	9%	0.03	-5%
\$25,000	\$34,999	1,298	17%	\$ 137,471	45	7%	16%	0.03	-11%
\$35,000	\$49,999	1,213	16%	\$ 213,847	271	41%	57%	0.22	25%
\$50,000	\$74,999	1,174	16%	\$ 336,049	161	24%	82%	0.14	9%
\$75,000	\$99,999	331	4%	\$ 458,250	78	12%	93%	0.24	7%
\$100,000	\$149,999	230	3%	\$ 712,836	22	3%	97%	0.09	0%
\$150,000 or more		107	1%	\$ 967,427	21	3%	100%	0.20	2%
Total		7,441	100%		658	100%			

Source: BBC Research & Consulting.

In summary, the greatest needs in the city include the following:

- As seen in Figure III-8, renter households earning \$20,000 per year or less account for 33 percent of all total households. However, only 12 percent of the city’s rental units are priced affordably for these households, resulting in a rental gap of nearly 1,500 units exists for these households. Section 8 Vouchers may provide some financial relief for low income families in Coeur d’Alene, but with wait times exceeding three years, Vouchers provide little to no short-term relief for many households.
- There is a shortage of rental units for households earning \$50,000 or more. The rental market has not been developed to accommodate for this price point, primarily because higher earning renters more often opt for homeownership. Additionally, if high-earning renter households chose to rent, they are also able to rent from the abundance of units priced affordably for lower income levels. A rental gap exists in many communities for renter households with incomes high enough to purchase homes.
- As seen in Figure III-9, there are currently 658 units currently on the market in Coeur d’Alene. Many of these units are priced affordably for renter households earning between \$35,000 and \$75,000 per year. However, many of the city’s renter households fall in these categories, making the homeownership market competitive for first-time homebuyers. For example, there are currently 161 units for sale, compared to 1,174 households earning between \$50,000 and \$75,000 annually.

Housing Market Comparison – 2007 and 2011

The city's housing market is not drastically different in 2011 compared with 2007. Many of the challenges the city faced in providing its residents with affordable and quality housing in 2007 remain, while some changes have occurred.

How has the city's housing market remained the same since 2007?

- The city continues to struggle to house its lowest income renters. In 2007, a gap of 861 units existed for renters earning less than \$15,000 per year. In 2011, the gap has increased to 1,070 units.
- Housing affordable for the city's workforce continues to be a need in the city. Many jobs in the city pay modest wages, and competition is high for quality rental and for sale homes priced affordably for the city's workforce. Stakeholders contributing to the 2007 market study identified the city's workforce as a segment of the population in need of affordable housing opportunities, and analysis completed in this report revealed the same need.
- Housing quality is still a concern for homeowners. According to the 2011 resident survey, 44 percent of homeowners said they have repairs they need to make to their home, which is nearly the same response rate received in 2007 (46 percent) to the same question.

How has the city's housing situation changed since 2007?

- Since 2007, Coeur d'Alene has become a HUD entitlement community, meaning that the city now receives a direct Community Development Block Grant (CDBG) allocation annually. This provides the city with more flexibility to address the housing and community development needs of its low- and moderate-income residents.
- The wait period for a HUD Section 8 Voucher has increased from 28 months to more than 36 months. As such, since 2007, it has become even more challenging to obtain a Section 8 Voucher from the IHFA to use in Coeur d'Alene. This indicates even greater need for affordable housing opportunities in the city to meet unmet demand from the Section 8 Voucher program.

Recommendations

A series of recommendations was made as part of the 2007 housing market study. These recommendations are re-examined below. As a part of this 2011 housing market analysis, goals are either noted as being accomplished, or a recommendation is made to continue investigating ways to implement the goal.

Goal No. 1. Create affordable homeownership opportunities for Coeur d'Alene's workforce. According to the 2007 housing market study, the City of Coeur d'Alene needs programs to create and maintain the affordability of homeownership units for its workforce earning between \$25,000 and \$50,000 per year.

In the last 4 years, the city has addressed affordable homeownership opportunities for the city's workforce. For example, the city established a partnership with the North Idaho Housing Coalition (NIHC), which defines itself as a "one-stop-shop for homebuyers."⁶ With grant funding from IHFA, the NIHC "purchases foreclosed houses, renovates them as needed, and then offers them for sale to qualified buyers below appraised value." The program also assists homeowners by paying all closing costs and providing gap financing for clients if they are unable to qualify for the necessary loan amount.

The city has also made a number of planning code enhancements to help make homeownership more affordable in the city. The city now allows for accessory dwelling units, has zoned for zero lot lines and has changed its infill regulations to allow for more affordable housing development.

Despite these positive steps, it is still difficult for the city's workforce to become homeowners. Jobs in the city pay modest wages. As seen in Figure III-9, the current for sale housing market is competitive for renters earning between \$35,000 and \$75,000 annually, which likely includes the city's one- and two-worker households earning average wages. Currently, 432 for sale units are available for 2,387 renter households falling in this income cohort. As the city's home prices continue to increase, fewer homes will be available for the city's workers.

Moving forward, the city should continue the goal of creating affordable homeownership opportunities for the city's workforce.

Goal No. 2. Develop more deeply subsidized rental units, including affordable senior rentals and housing with supportive services. Since 2007, 50 rental units have been constructed with HUD 202 and 811 grants. The new units are targeted for residents with chronic mental illnesses (14 units) and seniors (36 units). 2011 IHFA tax credit allocations will fund additional affordable units in the city, providing much needed affordability to the city's residents. Moving forward, Coeur d'Alene should continue engaging developers interested in affordable housing projects. However, to ensure that affordable rental units do not compete with market rate units, the city should support and advocate for the deepest subsidies available, such as 60 percent of AMI or less.

Goal No. 3. Create a housing rehabilitation program (to preserve existing affordable housing). Since 2007, the city has become a HUD entitlement community and begun a home rehabilitation program with its CDBG allocation. To date, the city has spent \$85,494 assisting 23 households. BBC's recommendation moving forward is to continue the home rehabilitation program to continue assisting financially strained workforce homeowners with necessary home repairs.

Goal No. 4. Receive a direct allocation of the Community Development Block Grant. In 2007, BBC recommended that the city become a HUD entitlement community to receive a direct allocation of the Community Development Block Grant (CDBG). Shortly after the recommendation was made, the city became an entitlement community. The city has received three year's worth of funding and is preparing for a fourth.

⁶ <http://www.northidahohousing.org/>

The city anticipates a 2011 CDBG allocation of \$309,469.00. In its 2011 Action Plan, the city anticipates allocating \$110,000 of funding for land acquisition for future development of low- and moderate-income housing; \$77,000 for apartment rehabilitation; \$40,000 to assist low- and moderate-income homeowners remediate health and safety concerns with their homes; and, \$23,000 for housing counseling.⁷

Goal No. 5. Educate residents, mitigate resistance to affordable housing (NIMBYism) and keep affordable properties in sound condition. The 2007 study suggested that as Coeur d'Alene and Kootenai County continue to grow and diversify, it is likely that tension may develop between new residents and long-time community members, as well as between higher- and lower-income populations. BBC recommended that the City monitor any growing tension, and work to mitigate conflict through community education and outreach efforts.

The city has been active in furthering knowledge of fair housing among its residents and city officials. City staff made a presentation to the Planning Commission and City Council in 2010, which briefed them on the importance of furthering fair housing in the city. Furthermore, the city sponsors an annual free fair housing training session for residents sponsored by the Intermountain Fair Housing Council.

Moving forward, the city should identify partnerships to help implement the Fair Housing Action Plan (FHAP) outlined in Section V. Once partnerships are identified, a timeline should be specified for implementing the FHAP. If the city continues to be proactive in educating residents and public officials on the importance of fair housing, NIMBYism will be minimized.

Goal No. 6. Maintain quality schools within the City. The 2007 housing market study suggested that the city help maintain quality schools within the city. The public input process for that study identified resident concern about future declining enrollment in the city's schools. Declining enrollment occurs because of demographic changes that lower the number and proportion of children in a community, and/or because families make a choice to leave a school district (which is usually associated with school quality and satisfaction).

The city is limited in its ability to directly impact declining enrollments and school performance. However, since 2007, the city has supported the school district when possible. The city can also help provide affordable and quality housing for its workforce to help prevent future declines in enrollment. If the city can retain younger families that work in Coeur d'Alene while their children are of school age, future declines in enrollment could be prevented.

⁷ As of February 10, 2011, the PY2011 Action Plan was in the 30-day public comment period.

SECTION IV.
Analysis of Impediments to Fair Housing

SECTION IV.

Analysis of Impediments to Fair Housing

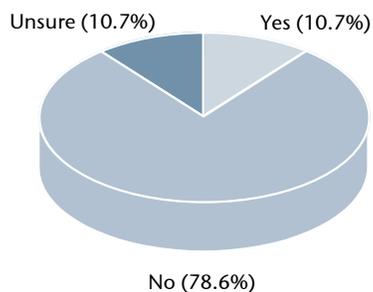
This section contains the analysis of fair housing barriers in Coeur d'Alene, which serves as an update to BBC's 2007 Analysis of Impediments to Fair Housing Choice (AI) that was conducted as part of the city's Five-year Consolidated Plan. More specifically, this section reports barriers identified by Coeur d'Alene residents and stakeholders; contains an analysis of zoning and land use laws; reviews public housing authority policies and procedures; contains an analysis of lending activity; and reports fair housing complaint and legal case data.

Resident and Stakeholder Surveys

To identify housing barriers associated with private market activity for which data is not available, two survey efforts were conducted:

- **Resident survey.** Residents in Coeur d'Alene were surveyed about housing discrimination that they or someone they know have experienced. Residents were also asked how they would find information about fair housing if they needed to.
- **Stakeholder survey.** Stakeholders were asked to evaluate more than 20 possible types of barriers to fair housing on a scale of 1 to 3 for frequency of occurrence in Coeur d'Alene. They were also asked about their clients' experience with discrimination and access to fair housing information.

Figure IV-1.
Response to Survey Question:
Do you think you have ever experienced housing discrimination?



Source: COEUR D'ALENE Resident Survey, 2011.

Prevalence of discrimination. According to both resident and stakeholder survey participants, widespread discrimination is likely not occurring in Coeur d'Alene. For example:

- The majority of residents (79 percent) did not believe they had been discriminated against in finding housing.¹ Only 7 percent of respondents cited discrimination that fell under fair housing law.² These discriminatory acts included discrimination because of a mental illness and familial status.³

¹ The remaining 21 percent of respondents were equally split between residents who had experienced discrimination and those that were unsure.

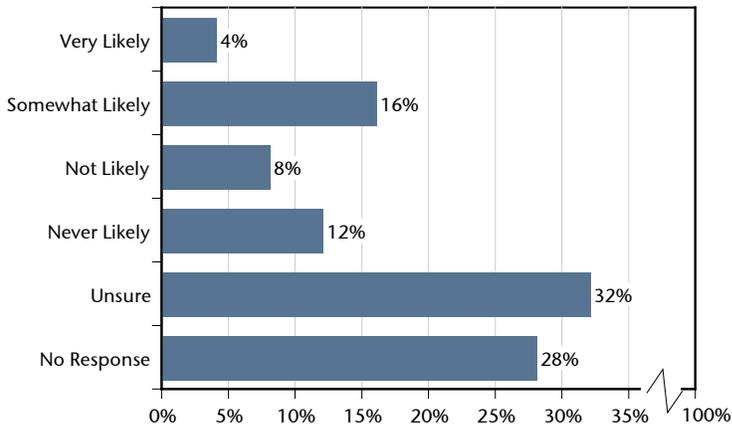
² This calculation does not include residents that cited discrimination that is not covered under fair housing law (e.g., not able to own non-service animals).

³ The familial status discrimination claim did not take place in Coeur d'Alene.

- Sixteen percent of stakeholders said it was “somewhat likely” for their clients to experience discrimination. However, a majority of stakeholders were simply unsure or did not respond to a question regarding their clients’ likelihood to experience discrimination when looking for housing.

Figure IV-2.
Response to
Survey Question:
How likely is it for your
clients to experience
discrimination when
trying to rent or buy
housing?

Source:
 Coeur d’Alene Stakeholder Survey,
 2011.



The assistance offered by stakeholders to their clients looking for housing may help alleviate some potential discrimination. For example, when stakeholders were asked how their clients learned about potential housing opportunities, a majority of respondents said that their clients learned about housing opportunities from their organization. Stakeholders assist clients in other ways as well, such as advertising housing opportunities at other non-profit organizations or helping clients call housing providers.

Reasons for discrimination. Stakeholders were asked to expound on the types of discrimination their clients may face, as well as the types of discrimination they think may occur most frequently within Coeur d’Alene. Stakeholders feel that discrimination based on familial status and the presence of either a physical and/or mental disability are the most common forms of discrimination in Coeur d’Alene, both among their clients and among all residents in Coeur d’Alene. When asked what types of discriminatory activities may occur against these individuals, stakeholders felt that an unwillingness to make reasonable accommodations for tenants with disabilities was the most common activity where discrimination could be demonstrated.

Barriers to fair housing. Stakeholders were asked to determine the severity of a series of potential fair housing barriers. The results from this ranking exercise appear in Figure IV-3. The top three barriers, which had the greatest proportion of “modest” and “serious” rankings from stakeholders, include the following:

- Income levels of minority and female-headed households;
- Lack of knowledge among residents regarding fair housing; and
- Lack of knowledge among small landlords regarding fair housing

Figure IV-3.

Response to Survey Question:

How would you evaluate the following barriers to fair housing in Coeur d'Alene?

	No Barrier	Minor	Modest	Serious
Income levels of minority and female-headed households	0.0%	25.0%	41.7%	33.3%
Concentration of low-income housing in certain areas	7.7%	46.2%	23.1%	23.1%
Concentration of group homes in certain neighborhoods	18.2%	63.6%	18.2%	0.0%
Limitations on density of housing	33.3%	25.0%	33.3%	8.3%
Lack of adequate zoning for manufactured housing	33.3%	8.3%	50.0%	8.3%
Restrictive covenants by homeowner associations or neighborhood organizations	25.0%	25.0%	33.3%	16.7%
Limited capacity of a local organization devoted to fair housing investigation/testing	15.4%	30.8%	30.8%	23.1%
Lack of knowledge among residents regarding fair housing	7.7%	15.4%	53.8%	23.1%
Lack of knowledge among large landlords/property managers regarding fair housing	7.1%	42.9%	21.4%	28.6%
Lack of knowledge among small landlords regarding fair housing	7.7%	15.4%	46.2%	30.8%
Lack of knowledge among real estate agents regarding fair housing	36.4%	18.2%	27.3%	18.2%
Lack of knowledge among bankers/lenders regarding fair housing	36.4%	9.1%	27.3%	27.3%
Lack of knowledge among insurance industry representatives regarding fair housing	45.5%	9.1%	36.4%	9.1%
Use of "neighborhood stability" or similar factors as proxies for racial makeup in appraisals	40.0%	30.0%	30.0%	0.0%

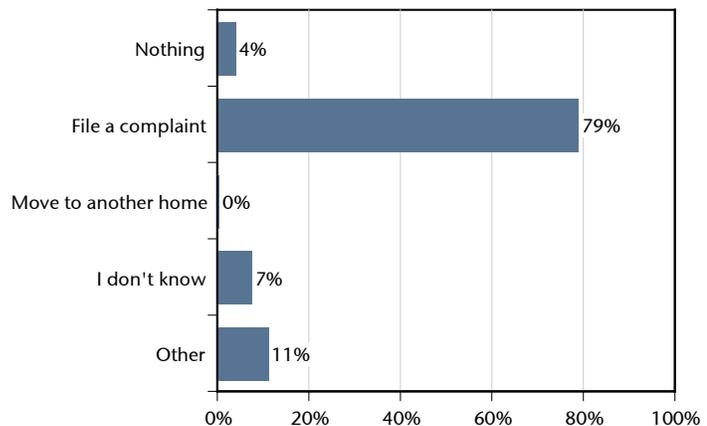
Source: Coeur d'Alene Stakeholder Survey, 2011.

Knowledge of fair housing resources. Residents seem to have a basic understanding of their rights under fair housing law. As seen in Figure IV-4, nearly 80 percent of survey respondents understood that a complaint should be filed if discrimination occurred to them or others when looking for housing.

Figure IV-4.

Response to Survey Question:

Suppose you or someone you knew thought they'd been discriminated against in trying to find a place to rent or buy a house. What would you recommend they do?

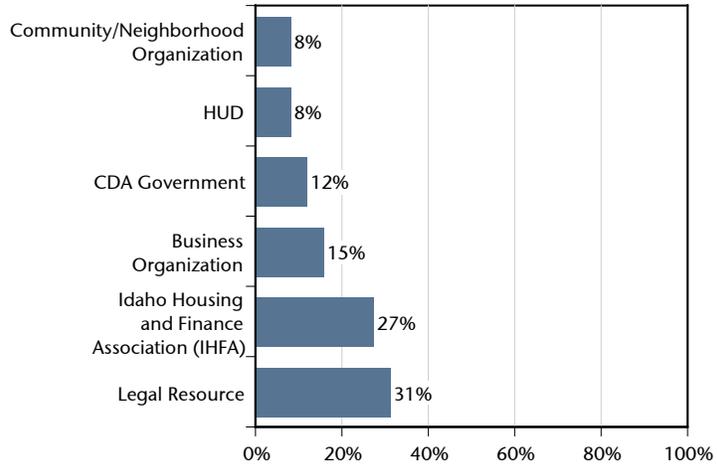


Source: Coeur d'Alene Stakeholder Survey, 2011.

Fifty-nine percent of survey respondents said they knew who to contact if they or someone they knew was discriminated against; the remaining 41 percent did not know who to contact. When asked to identify the organization or individual they would contact if they or someone they knew experienced discrimination, the largest proportion said they would contact a legal resource.

Figure IV-5.
Response to Survey Question:
If you felt that you or someone you knew were discriminated against when trying to find a place to rent or buy a house, which person/organization would you call first for information?

Source:
 Coeur d'Alene Stakeholder Survey, 2011.



Approximately one-quarter of stakeholders have assisted clients in completing a fair housing complaint. For those stakeholders who have assisted clients with complaints, most identified the process as “easy.” For those stakeholders who have not helped a client file a complaint, most said they would direct clients to the Intermountain Fair Housing Council, Idaho Housing and Finance Association (IHFA) or HUD.⁴

Zoning, Land Use and Housing Policy Review

A zoning, land use and housing policy review for Kootenai County was completed in conjunction with the statewide AI for Idaho also completed by BBC.⁵ The primary findings from the analysis for Kootenai County included the following:

- 3,000 sq. ft. minimum lot size is among the lowest reviewed and promotes affordability;
- Multi-family housing approvals should allow efficient densities and building heights;
- A broader range of FHAA group living facilities could be accommodated;
- Manufactured home siting and park availability standards are good; and,
- Accessory dwelling provisions are good but would better promote affordability if rental use was permitted.

Figure VI-6 summarizes the review of the county’s zoning, land use and housing review.

Figure IV-6.

⁴ IHFA does not enforce fair housing law and would refer complaints to the appropriate service provider.

⁵ Zoning, land use and housing policy review was completed by Clarion and Associates, who served as a sub-consultant to BBC.

Land Use Review, Kootenai County, 2011

Potential Affordable Housing Barriers	Kootenai County Regulations
Lot Dimensions	
Smallest minimum lot size in a residential district (with services)	3,000 sq. ft.
Narrowest lot width in a single-family district	—
Minimum house size requirement (any district)	—
Highest density available in a multi-family district	1 DU per 3,000 sq. ft.
Tallest building height in a multi-family district	—
Where is multi-family permitted? By special permit?	Permitted in commercial and high density residential districts; by special notice in the suburban district
Affordable Housing Provisions	
Are there incentives for affordable housing?	No
Group Housing	
What types of group housing are permitted in SF districts?	Retirement, nursing and convalescent homes by CUP
What types of group housing are permitted in MF districts?	Retirement and convalescent homes by CUP
Manufactured Housing/Mobile Home (MH) Regulations	
Are MHs allowed in residential districts?	Yes
Does the county have MH standards?	Yes, single standards within definition, have park standards as well
Does the county have a MH park district?	No
Are MHs (parks/single units) allowed in other districts?	Only where single family dwellings are permitted
Accessory Dwelling Unit (ADU) Regulations	
Does the code address accessory dwelling units?	Yes
Are ADUs allowed in any districts, which ones?	In all agricultural and residential districts, not for rental purposed
Are ADUs allowed by special permit only?	An accessory land use permit is required
Parking Requirements	
Number of parking spaces required for single-family units	1 per DU
Number of parking spaces required for multi-family units	—
Are there lower standards for affordable/special needs housing?	1 per 5 beds

Source: Coeur d'Alene Stakeholder Survey, 2011.

Coeur d'Alene provides even more options for developing density and increasing affordability than Kootenai County overall. A few important differences of the city from the county's housing barrier analysis include the following:

- The city allows for 300 square foot accessory dwelling units (ADU) in all zoning districts. Special permits are not required to build an ADU.
- The city has a density bonus incentive in place in the Downtown Core (DC) to induce workforce housing development. Four square feet of floor area is allowed for each square foot of workforce housing provided within 1.5 miles of the project site and within Coeur d'Alene city limits.
- The county's minimum lot size of 3,000 square feet was among the lowest reviewed in the state. Coeur d'Alene accommodates pocket residential in the R-8, R-12 and R-17 residential districts, as well as the C-17L and C-17 commercial districts. Pocket residential has no lot size and setback minimums on the site, but overall density is set by the zoning.

Appendix A provides more detailed guidance on avoiding barriers to affordable housing, which was also generated as part of the state-wide AI.

Affordable Housing and Public Housing Review

Affordable housing programs available to Coeur d'Alene residents include the Low Income Housing Tax Credit (LIHTC) program; the HOME program; the Project-Based Section 8 program; and the Section 8 Housing Choice Voucher program. Combining the LIHTC, HOME and Project-Based Section 8 programs, there are 869 family units, 461 elderly units, and 175 handicapped accessible units in Coeur d'Alene offering subsidized rental housing.

The city does not have a public housing authority in operation. The Idaho Housing and Finance Association administers the Section 8 program in Coeur d'Alene.

Low-Income Housing Tax Credit (LIHTC) and HOME programs. The LIHTC program provides a developer with federal tax credits to build or rehabilitate housing for low income persons. LIHTC developments usually serve slightly higher income populations (40 to 60 percent of MFI) than do Public Housing Authorities or the Section 8 voucher program, which generally serve households at 30 percent of MFI and less. The federal Home Investment Partnerships Program (HOME) provides subsidies to construct or rehabilitation affordable rental housing.

Figure IV-6 lists the LIHTC projects and/or HOME developments in Coeur d'Alene and the number of subsidized units. The most recent available data are current as of January 2011.

Figure IV-6.
Low-Income Housing Tax Credit/HOME Developments in Coeur d'Alene, as of January 2011

Facility Name	Address	Units by Type			Unit Size (by no. of bedroom)					Rent Range	
		Family	Elderly	Accessible	Stu.	1	2	3	4	Low	High
Cherry Ridge	1053 Emma Ave.	61		11	X	X				VARIES	
Coeur d'Alene Senior Housing	7712 N. Heartland Dr.		37	37	X	X				\$ 215	\$ 560
Fairwood Apts	1905 W. Appleway	120		2	X	X				\$ 495	\$ 591
Falls Creek Apartments	2831 N. Julia Street	170			X	X	X			\$ 228	\$ 702
Heartland Senior Housing	7745 N. Heartland Dr.		23	29	X	X				VARIES	
Homestead Apartments	106 E. Homestead	7	6	2	X	X				\$ 475	\$ 550
Kathleen Corers	3350 Kathy Loop	30			X	X	X			\$ 277	\$ 690
Lakewood Ranch	3755 4th Street		80	4	X	X				VARIES	
Maple Grove Apartments	3157 Fruitland	23		1	X	X				\$ 475	\$ 520
Park Place Apartments	3825 Ramsey	30		16	X	X	X			VARIES	
Silver Lake Apartments I	698 W. Wilbur	60		3	X	X	X			\$ 223	\$ 605
Silver Lake Apartments II	689 W. Wilbur	53		3	X	X	X			\$ 373	\$ 605

Source: Northern Panhandle Idaho Assisted Housing Directory, Idaho Housing and Finance Association.

As of January 2011, there were 12 low income housing tax credit and HOME developments in Coeur d'Alene. These developments had 554 family units, 146 units for seniors, and 108 were accessible to persons with disabilities.

Project-Based Section 8 program. Under the project-based Section 8 program, a Public Housing Authority (PHA) enters into an assistance contract with a property owner to provide rental assistance to a specified number of units and for a specified term. The PHA refers families from its waiting list to the project owner to fill vacancies. The rental payment is on a sliding scale, determined by a tenant's household income. Because the assistance is tied to the unit, a family who moves from the project-based unit does not have any right to continued housing assistance. However, they may be eligible for a tenant based voucher when one becomes available. The PHA pays the owner the difference between 30 percent of a family's income and the gross rent for the unit.

Figure IV-7 lists the Project-Based Section 8 properties in Coeur d’Alene. Of the Project-Based Section 8 units in Coeur d’Alene, 156 are designated as family units, 210 units are set aside for the elderly, and 37 units are accessible to persons with disabilities.

**Figure IV-7.
Project-Based Section 8 Developments, Coeur d’Alene, as of January 2011**

Facility Name	Address	Units by Type			Unit Size (by no. of bedroom)				
		Family	Elderly	Accessible	Stu.	1	2	3	4
		Heritage Place I & II	702 W. Walnut Avenue		129	2		X	
English Village Apartments	115 Anton Avenue	54		8		X	X	X	
Coeur d’Alene Manor	3016 Government Way		60		X	X			
Lincoln Way Terrace Apartments	Harrison & Lincoln Way	18		2		X			
Howard Place Apartments	2707 N. Fruitland Lane	40		2		X	X	X	
Lake Country Apartments	1421 N. 9th Street	44		2			X	X	
Prairie Run	7760 N. Heartland Drive		21	21		X			

Source: Northern Panhandle Idaho Assisted Housing Directory, Idaho Housing and Finance Association.

Expiring use properties. HUD maintains a database of subsidized units that utilized government contracts which are time-limited. Upon maturity of these contracts, property owners may elect to convert their units to market rates. A review of the HUD “expiring use” database found that, of the above Project-Based Section 8 units, 147 units are subject to expiration in 2010; 136 units in 2011; and 109 units in 2012.

**Figure IV-8.
Expiring Subsidized Units, Coeur d’Alene, as of November 2010**

Name	Number of Subsidized Units	Current Year to Expire	Overall Year to Expire	Unit Description	Type of Subsidy
Coeur d’ Alene Manor	60	2011	2011	General	Loan Management Set-Aside
English Village	55	2011	2011	General	Historic Preservation
Howard Place	40	2012	2020	General	Housing Finance Development Agency
Lake Country Apartments	44	2012	2020	General	Housing Finance Development Agency
Lincoln Way Terrace	18	2010	2012	General	USDA Rural Rental Housing Loans
Prarie Run	21	2011	2011	General	Project Rental Assistance Contract
Heritage Place	81	2010	2010	Elderly	Section 202
Heritage Place II	48	2010	2010	Elderly	Section 202
Heritage Place III	25	2012	2012	Elderly	Project Rental Assistance Contract
Total Subsidized Units	392				

Source: HUD.

Section 8 voucher program. The Section 8 voucher program provides rental subsidies to qualifying households who find rental housing in the private market. Section 8 is a federally funded program with budget limitations. It is a very popular program because it offers families a wide range of choices about where to live and, as a result, waiting lists to participate in the program are usually quite long. The Section 8 program is generally the best program available to assist extremely low- and very low-income households because the subsidies available are deeper than those provided by other programs. In many communities, the Section 8 voucher program is the primary housing assistance for special needs populations, including those at-risk or formerly homeless and persons with disabilities.

The Idaho Housing and Finance Association administers the Section 8 program through four branch offices statewide, including an office in Coeur d’Alene. As of January of 2011, 366 Section 8 Vouchers were being used by households residing in Coeur d’Alene. Section 8 Vouchers play an important role in housing disabled residents in Coeur d’Alene. Currently, 223 Vouchers (61 percent) are being used by families with at least one disabled family member. The current Section 8 waitlist is extensive and requires a 3 year wait or longer for a Voucher.

Fair Lending Analysis

This section contains an analysis of home loan and community reinvestment data. Community Reinvestment Act (CRA) ratings and Home Mortgage Disclosure Act (HMDA) data are commonly used in AIs to examine fair lending practices within a jurisdiction. HMDA data also contain interest rates of high cost loans, which allows an analysis of high cost lending patterns.

Community Reinvestment Act (CRA). The CRA requires that financial institutions progressively seek to enhance community development within the area they serve. On a regular basis, financial institutions submit information about mortgage loan applications as well as materials documenting their community development activity. The records are reviewed to determine if the institution satisfied CRA requirements. The assessment includes a review of records as related to the following:

- Commitment to evaluating and servicing community credit needs;
- Offering and marketing various credit programs;
- Record of opening and closing of offices;
- Discrimination and other illegal credit practices; and
- Community development initiatives.

The data are evaluated and a rating for each institution is determined. Figure IV-9 shows the results of recent CRA exams for banks in the City of Coeur d’Alene. As the Figure demonstrates, the banks all have strong ratings—all are rated “Satisfactory” or “Outstanding.” None were rated “Needs Improvement” or in “Substantial Noncompliance.”

**Figure IV-9.
CRA Ratings,
Coeur d’Alene,
January 2011**

Note:

Data current through September 30, 2010.

Source:

FIEC Interagency CRA Rating, October 2002.

Exam Date	Bank Name	CRA Rating
04-18-1992	Bank of America Idaho	Satisfactory
04-01-1997	Idaho Independent Bank	Satisfactory
02-23-1998	Mountain West Bank	Outstanding
10-01-1995	Northern State Bank	Satisfactory
03-31-1994	U.S. Bank Of Idaho, N.A.	Satisfactory

Mortgage lending data. HMDA data are widely used to detect evidence of discrimination in mortgage lending. In fact, concern about discriminatory lending practices in the 1970s led to the requirement for financial institutions to collect and report HMDA data. The variables contained in the HMDA dataset have expanded over time, allowing for more comprehensive analyses and better results. However, despite expansions in the data reported, HMDA analyses remain limited because of the information that is *not* reported.

As such, studies of lending disparities that use HMDA data carry a similar caveat: HMDA data can be used to determine disparities in loan originations and interest rates among borrowers of different races, ethnicities, genders, and location of the property they hope to own. The data can also be used to explain many of the reasons for any lending disparities (e.g., poor credit history). Yet HMDA data do not contain all of the factors that are evaluated by lending institutions when they decide to make a loan to a borrower. Basically, the data provide *a lot* of information about the lending decision—but *not all* of the information.

Beginning in 2004, HMDA data contained the interest rates on higher-priced mortgage loans. This allows examinations of disparities in high-cost, including subprime, loans among different racial and ethnic groups. It is important to remember that subprime loans are not always predatory or suggest fair lending issues, and that the numerous factors that can make a loan “predatory” are not adequately represented in available data. Therefore, actual predatory practices cannot be identified through HMDA data analysis. However, the data analysis can be used to identify where additional scrutiny is warranted, and how public education and outreach efforts should be targeted.

HMDA data report several types of loans. These include loans used to purchase homes, loans to make home improvements and refinancing of existing mortgage loans, as defined below.

- **Home purchase loan.** A home purchase loan is any loan secured by and made for the purpose of purchasing a housing unit.
- **Home improvement loan.** A home improvement loan is used, at least in part, for repairing, rehabilitating, remodeling, or improving a housing unit or the real property on which the unit is located.
- **Refinancing.** Refinancing is any dwelling-secured loan that replaces and satisfies another dwelling-secured loan to the same borrower. The purpose for which a loan is refinanced is not relevant for HMDA purposes.

The HMDA data are separated into two primary loan categories: conventional loans and government-guaranteed loans. Government-guaranteed loans are those insured by the Federal Housing Administration and Veterans Administration.

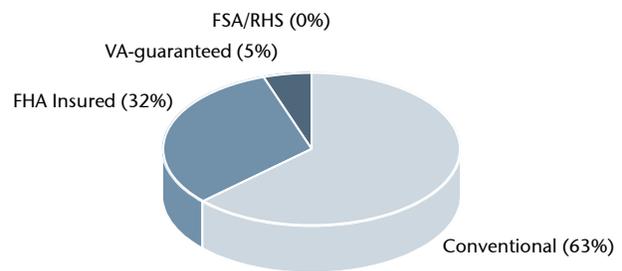
This section uses the analysis of HMDA data to uncover:

- The geographic areas in Coeur d'Alene where high-cost lending and loan denials are concentrated, and the correlation of these areas with concentrations of minority and low income households;
- Disparities in high-cost lending and loan denials across different racial and ethnic groups.

Loan denials. The most recent HMDA data available are for the 2009 calendar year. During 2009, there were about 2,800 loan applications made in Coeur d'Alene for owner-occupied homes. Sixty-three percent of these loans were conventional loans; 32 percent were FHA-insured; and the balance was VA- or FSA/RHS-guaranteed, as shown in Figure IV-10.

Figure IV-10.
Mortgage Loan Applications,
Coeur d'Alene MSA, 2009

Source:
Home Mortgage Disclosure Act (HMDA), 2009.



Sixty-five percent of these applications were for refinances; 31 percent were for home purchases. The balance consisted of home improvement loans.

Overall, 63 percent of applications were originated and 15 percent were denied. The remaining applications were withdrawn, incomplete or were not accepted upon approval.

Figure IV-11.
Action Taken on Mortgage Loan
Applications, Coeur d'Alene, 2009

Source:
Home Mortgage Disclosure Act (HMDA), 2009.

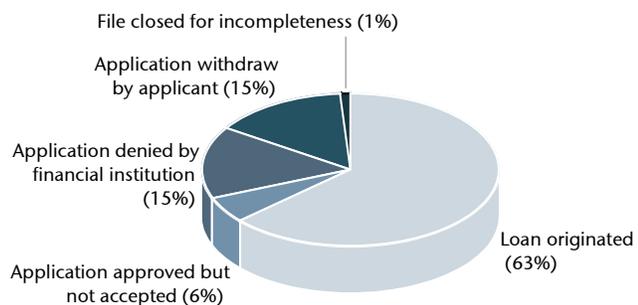
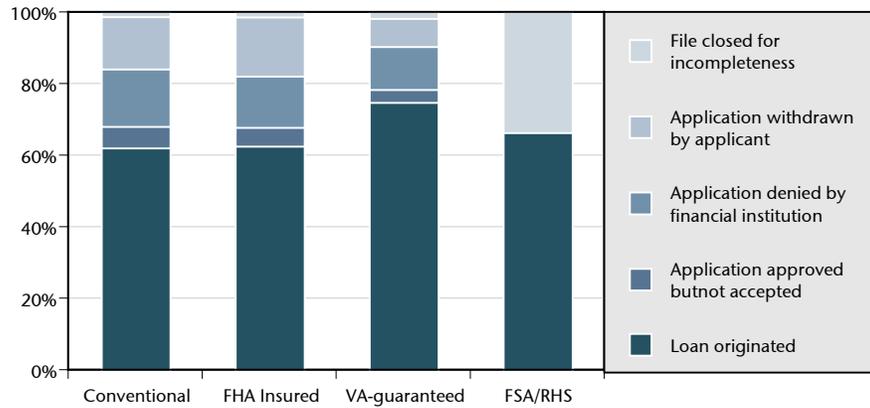


Figure IV-12 shows the result of loan applications by type of loan. Seventy-five percent of VA-guaranteed loans were originated, while conventional loan products had the highest denial rates (16 percent).

Figure IV-12.
Action Taken on Mortgage Loan Applications by Loan Type, Coeur d’Alene, 2009

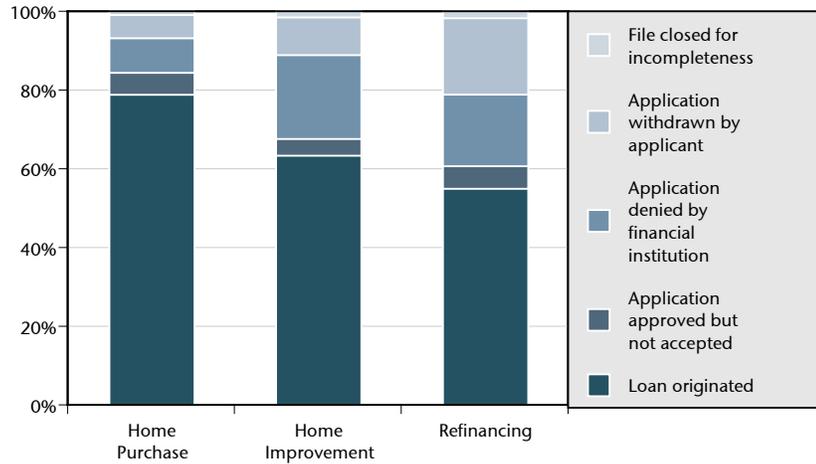
Source:
 Home Mortgage Disclosure Act (HMDA), 2009.



Loan applications for home purchases had the highest origination rates in 2009, while home improvements had the highest denial rates. Approximately 20 percent of home improvement loans were denied, indicating some difficulty in accessing home equity for home improvement projects. Only 55 percent of refinance loans originated; however, it was not entirely due to loan denial. Eighteen percent of refinance applications were denied, while 19 percent were withdrawn by the applicant.

Figure IV-13.
Result of Mortgage Loan Applications by Loan Purpose, Coeur d’Alene, 2009

Source:
 Home Mortgage Disclosure Act (HMDA), 2009.



Denial rates by race and income. As seen in Section II, 95 percent of the city’s population is racially white and 96 percent are ethnically non-Hispanic. As such, Coeur d’Alene’s racial and ethnic minority groups are small and are not well represented within HMDA. For example, 2,600 loan applicants identified their race, and only two of those applications were completed by African Americans. Additionally, only 2 percent of loan applicants identifying their ethnicity were Hispanic.

**Figure IV-14.
Result of Mortgage Loan Applications by Race/Ethnicity, Coeur d’Alene, 2009**

Note:
Loan applicants are not required to provide their race and/or ethnicity.
Overall, 2,611 applicants identified their race and 2,602 identified their ethnicity.

Source:
Home Mortgage Disclosure Act (HMDA), 2009.

	Percent of Applications
Race	
American Indian	0.4%
Asian	0.5%
Black or African American	0.1%
Native Hawaiian	0.3%
White	98.7%
Ethnicity	
Hispanic	1.9%
Not Hispanic	98.1%

Figure IV-15 presents the results of loan applications by ethnicity for the city’s residents.⁶ Little difference exists in the origination and denial rates between Hispanic and non-Hispanic residents.

**Figure IV-15.
Result of Mortgage Loan Applications by Race/Ethnicity, Coeur d’Alene, 2009**

Source:
Home Mortgage Disclosure Act (HMDA), 2009.

	Hispanic	Non-Hispanic
Loan originated	67.3%	64.7%
Application approved but not accepted	2.0%	5.5%
Application denied by financial institution	16.3%	14.8%
Application withdrawn by applicant	14.3%	14.0%
File closed for incompleteness	0.0%	0.9%

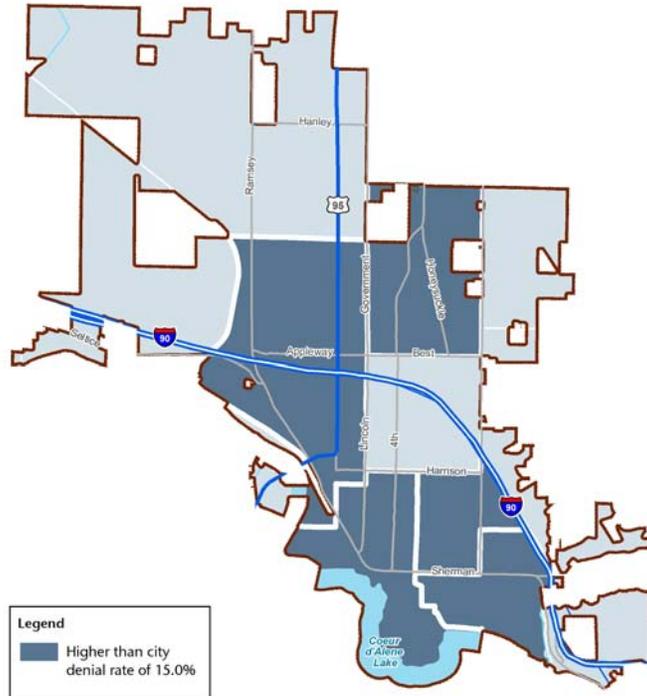
Geographic characteristics of loan applications. Geographic trends in denial rates can insinuate that certain portions of a community may have difficulty accessing capital for either home purchases, home repairs or refinancing.

The city’s overall loan denial rate was 15 percent in 2009. Five Census Tracts had denial rates that exceeded the city’s overall denial rates. These Tracts are primarily located in the central and southern portions of the city.

⁶ Too few racial minority applications were available for analysis.

Figure IV-16.
Denial Rates by Census Tract,
Coeur d'Alene, 2009

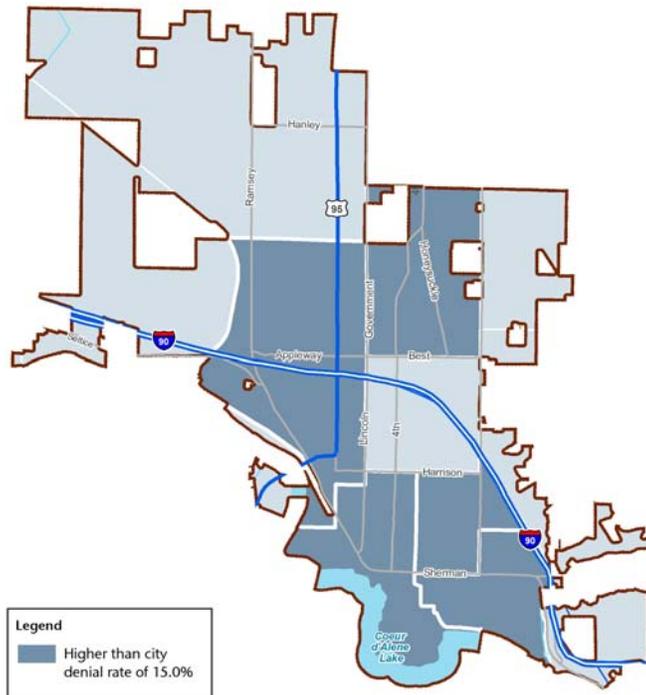
Source:
 Home Mortgage Disclosure Act (HMDA), 2009.



Home purchase loans have the highest origination rate (79 percent), as well as the lowest denial rate (9 percent). However, loan applicants in some portions of the city experienced higher denial rates when applying for home purchase loans. For example, 16 percent of home purchase applications in the southern portion of the city were denied.

Figure IV-17.
Denial Rates by Census Tract
for Home Purchase Loans,
Coeur d'Alene, 2009

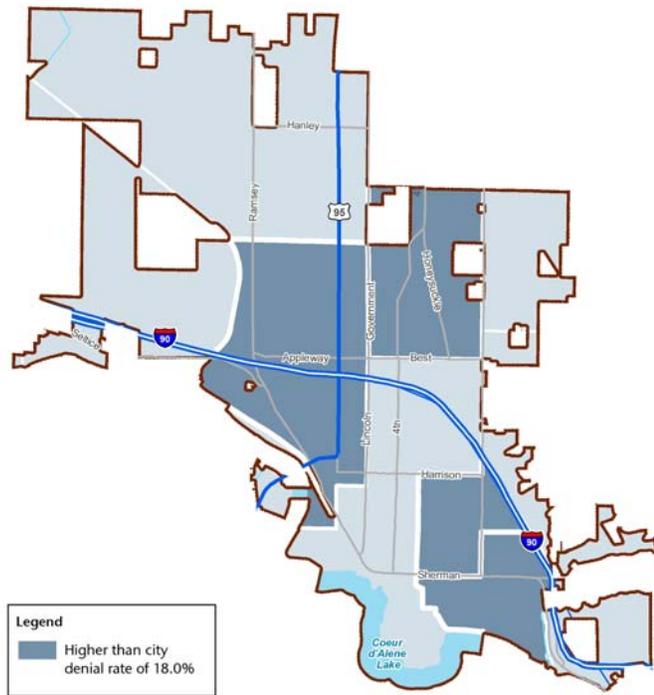
Source:
 Home Mortgage Disclosure Act (HMDA), 2009.



Creative financing employed during the housing boom expanded homeownership opportunities across the U.S. However, creative financing options such as adjustable rate mortgages or balloon payments quickly lead to higher monthly payments for residents and often increase the financial challenges associated with maintaining homeownership. As a result, the demand to refinance existing mortgages has increased to capitalize on low interest rates and try to stabilize monthly payments. Eighteen percent of refinance applications were denied for Coeur d'Alene residents in 2009. Denial rates for refinance applications exceeded the city-wide average in the Census Tracts highlighted in Figure IV-18.

Figure IV-18.
Denial Rates by Census Tract for Refinance Loans, Coeur d'Alene, 2009

Source:
 Home Mortgage Disclosure Act (HMDA), 2009.



Reasons for loan denials. Forty percent of loans were denied due a lack of collateral, and an additional 25 percent were denied because of a poor debt-to-income ratio. More specifically, a lack of collateral was most commonly cited for denials of refinance loans, and a poor debt-to-income ratio was most commonly cited in denials of loans for home purchase.

Figure IV-19.
Reasons for Loan Denials, Coeur d'Alene, 2009

Source:
 Home Mortgage Disclosure Act (HMDA), 2009.

Reasons for Denial	Percent
Collateral	39.9%
Debt-to-income ratio	24.8%
Credit history	13.3%
Other	12.2%
Unverifiable information	3.8%
Insufficient cash	2.8%
Credit application incomplete	2.1%
Employment history	0.7%
Mortgage insurance denied	0.3%

Subprime analysis. This section examines the prevalence of subprime loans in Coeur d'Alene. Overall, a very low 2 percent of originated loans in 2009 were considered subprime. As seen in Figure IV-20, residents in some portions of the city were more likely to receive subprime loan products than other portions of the city. For example, 5 percent of all loan originations occurred in Census Tract 13; however, 14 percent of all subprime loans occurred within this Tract.

Figure IV-20.
Distribution of Loan Originations and Subprime Loans, Coeur d'Alene, 2009

Source:
 Home Mortgage Disclosure Act (HMDA), 2009.

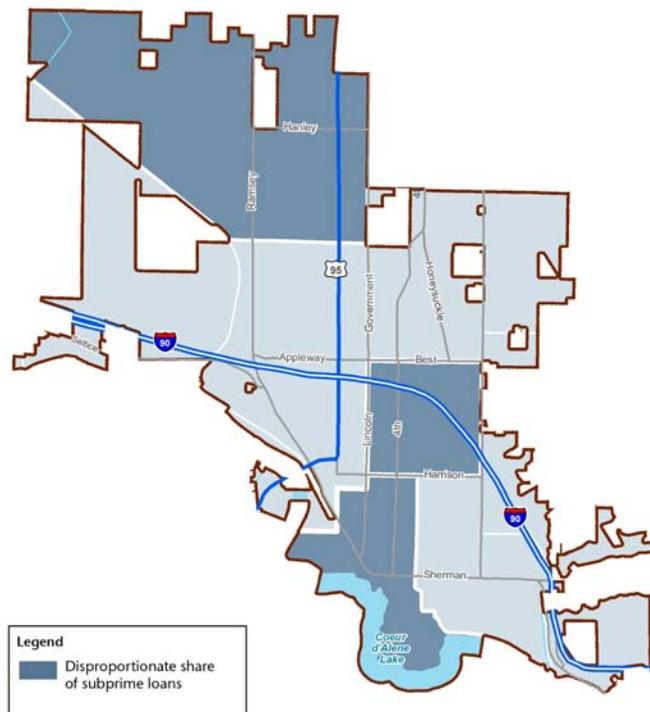
Census Tract	Percent Originations	Percent Subprime
7	52.9%	56.8%
8	9.5%	5.4%
9	2.8%	0.0%
12	12.1%	10.8%
13	5.4%	13.5%
14	4.5%	5.4%
15	7.0%	5.4%
16	5.9%	2.7%

Figure IV-21 maps Census Tracts where the share of subprime loans exceeds the share of loan originations in Coeur d'Alene.

Figure IV-21.
Disproportionate Share of Subprime Loans, Coeur d'Alene, 2009

Note:
 Highlighted Census Tracts have higher shares of subprime loans than share of loan originations.

Source:
 Home Mortgage Disclosure Act (HMDA), 2009.



Complaint and Legal Analysis

Complaint analysis. Coeur d'Alene residents who feel that they might have experienced a violation of the Fair Housing Act can contact one or more of the following organizations: HUD's Office of Fair Housing and Opportunity (FHEO), the Idaho Housing and Finance Association (IHFA), the Intermountain Fair Housing Council (IFHC), Idaho Legal Aid and the Idaho Human Rights Commission.

Legal Aid and the Idaho Human Rights Commission refer residents who call about fair housing complaints directly to HUD. Similarly, IHFA does not enforce fair housing law and would refer complaints to the appropriate service provider. Tenants or those wishing to pursue a complaint would be referred to local/statewide enforcement entities and/or to HUD's toll-free Fair Housing line, while providers would be referred to either to a HUD/FHEO specialist or to the housing hotline to determine an appropriate referral. Recently, IHFA established a 2-1-1 line that residents can use to get information about their fair housing questions and concerns.

Housing discrimination complaints filed with HUD may be done online at (<http://www.hud.gov/complaints/housediscrim.cfm>), toll free at 1-800-669-9777, or by contacting the Office of Fair Housing and Equal Opportunity in Washington D.C. or Idaho's Fair Housing Hub located in Seattle, Washington.

When HUD receives a complaint, HUD will notify the person who filed the complaint and will normally notify the alleged violator and allow that person to submit a response. The complaint will be investigated to determine whether there has been a violation of the Fair Housing Act.

A complaint may be resolved in a number of ways. First, HUD will try to reach an agreement between the two parties involved. A conciliation agreement must protect the filer of the complaint and public interest. If an agreement is signed, HUD will take no further action unless the agreement has been breached. HUD will then recommend that the Attorney General file suit.

If HUD has determined that a state or local agency has the same housing powers ("substantial equivalency") as HUD, they will refer the complaint to that agency and will notify the complainant of the referral. The agency must begin work on the complaint within 30 days or HUD may take it back. If, during the investigative, review, and legal process, HUD finds that discrimination has occurred, the case will be heard in an administrative hearing within 120 days, unless either party prefers the case to be heard in Federal district court. Idaho and Coeur d'Alene do not currently have substantial equivalency nor are they seeking such.

HUD fair housing complaints. As part of the AI, BBC obtained data from HUD's Seattle Regional Office of Fair Housing and Equal Opportunity (FHEO) about the number of housing discrimination complaints filed from 2000 through 2010 in the City of Coeur d'Alene. These complaints were filed by persons living in Coeur d'Alene, as well as by persons living outside of Coeur d'Alene who filed a complaint against a person or entity in the city. Figure IV-22 presents complaints by year. Eight complaints were filed with HUD in 2010, which is the highest number of complaints during the 10 year period examined. No complaints were filed in 2005 and 2008.

Figure IV-22.
HUD Complaints, Coeur d'Alene, 2000 to 2010

Source:
 HUD.

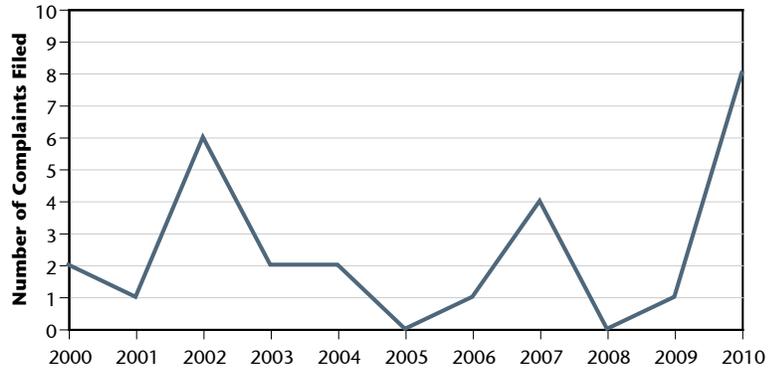


Figure IV-23 summarizes the basis for issued complaints. Nearly all complaints were filed on the basis of discrimination against a person with a disability. More specifically, failure to make reasonable accommodations for persons with disabilities, discriminatory terms/conditions/privileges of services or facilities; and discrimination in terms/conditions/privileges related to rental opportunities were the top three reasons disability-related complaints were filed by Coeur d'Alene residents or against persons and/or entities in Coeur d'Alene between 2000 and 2010.

Figure IV-23.
Basis for HUD Complaints, Coeur d'Alene, 2000 to 2010

Disability	Family Status	Race
<ul style="list-style-type: none"> ➤ Failure to make reasonable accommodation ➤ Discriminatory terms/conditions/privileges of services or facilities ➤ Discrimination in terms/conditions/privileges in renting ➤ Steering ➤ Discriminatory acts under Section 818 ➤ Refusal to rent ➤ Discrimination in the selling of a property ➤ Non-compliance with design and construction of handicap requirements ➤ Discriminatory terms/conditions/privileges related to a home sale ➤ Using ordinances to discriminate in zoning and land use 	<ul style="list-style-type: none"> ➤ Refusal to rent ➤ Discriminatory terms/conditions/privileges of services or facilities 	<ul style="list-style-type: none"> ➤ Discrimination in terms/conditions/privileges relating to a sale

Note: Complaints can be filed on the basis of more than one protected class or issue.
 Source: HUD.

Legal Analysis. As part of fair housing analysis, recent legal cases were reviewed to determine significant fair housing issues and trends in Idaho. A search of the National Fair Housing Advocate case database and PACER (Public Access to Court Electronic Filings) yielded three cases that are examined below. The important fair housing issues in these cases and subsequent outcomes are described below and are intended to serve as examples of the types of fair housing cases that can arise.

United States v. Hallmark Homes, et al. In February, 2006, the Court entered the Consent Decree resolving all claims in United States v. Hallmark Homes, Architects West, and Kevin W. Jester. The complaint, which was filed August 22, 2001, alleged that the defendants, who were the contractor

and architects, failed to design and construct the Creekside Meadows Apartment Complex, located in Coeur D'Alene, Idaho, to meet the accessibility requirements of the Fair Housing Act.

The defendants were ordered to pay \$115,000 into a retrofit fund and the owner of the property was to oversee all necessary retrofits to the public and common use areas and to the covered units during the upcoming year. In addition, the defendants were ordered make a payment of \$2,000 to a regional fair housing organization. The case was referred to the Division after the Department of Housing and Urban Development (HUD) received a complaint, conducted an investigation, and issued a charge of discrimination.

Intermountain Fair Housing Council (IFHC) v. Chief Seltice Mobile Home Park and Jeanie Peery.

In September 1995, M.T. (complainant) entered into a lease with the Chief Seltice Mobile Home Park in Post Falls, Idaho. In April 2007, M.T. obtained a service dog and submitted a prescription from her treating physician for the service animal, although at the time, dogs were allowed at the property. In April 2009, Defendant Peery, the owner of the mobile home park, asked the property manager to notify all tenants that they must remove their dogs from the property or have their leases terminated. The property manager notified the property manager that he could not force M.T. to remove her dog because it is a service animal for which she properly requested a reasonable accommodation with a prescription. Defendant Peery said that she would terminate M.T.'s lease regardless of the fact that M.T. had a service animal. In the same month, M.T. received a letter stating that her lease would be terminated due to the presence of her dog. M.T. subsequently filed a complaint against the property owner and the IFHC became involved. On several following occasions the IFHC tested the property and found additional evidence of the discriminatory practices. In June, 2009 the plaintiff filed a complaint with HUD alleging discrimination on the basis of disability and refusal to make reasonable accommodations.

Within the complaint and demand for jury trial, the Plaintiff asks the court to enter judgment against the defendant requiring damages in compensation for out-of-pocket expenses, lost economic opportunity, diversion of the Plaintiff's resources, punitive damages and frustration to the Plaintiff. Additionally, the plaintiff's attorney requests the court to enter an order establishing a Victims' Compensation Fund. Currently this case is scheduled for trial on February 7, 2011, unless the parties are able to reach a settlement.

Garcia v. Brockway. In May 2003, the plaintiff filed a complaint against the original owner/developer and designer of his apartment building, alleging failure to accommodate a disability as mandated by the Fair Housing Act. The defendants sold the complex in 1994 and had no stake it at the time of the complaint. Alleged violations included inaccessible public and common portions of the dwelling, doorways insufficiently wide to allow for passage of persons in wheelchairs, and inaccessible features in the kitchen, bathroom and inaccessibility of other features. The plaintiff also claimed the defendant failed to reasonably accommodate any modifications to the unit.

The defendants argued that because they no longer owned the building, their liability was time-barred by the statute of limitations in the Fair Housing Act. Thus, the plaintiff's complaint would have had to been filed within two years following construction of the apartment building in 1993. The plaintiff countered, arguing that the failure to remodel the apartments constituted a continuing violation and that the statute of limitations take effect upon discovery of the alleged violations. The Plaintiff also claimed that failure to make modifications constituted new violations.

The court ruled that the continuing accessibility issues were an effect of a prior discriminatory act but not a continuing violation. The argument that the two-year statute of limitations should begin at discovery of a violation was deemed unworkable as a developer would be liable for these violations indefinitely in spite of his or her ownership of the complex. Finally, the original developer was not found to be liable for refusal to make modifications while current management company was at fault. The defendant still had a remedy under the FHA with building owners, but his motion against the developers was dismissed.

Intermountain Fair Housing Council v. Rafter's Square LLC. In July, 2009 T.J. applied for a rental dwelling at Hillcrest Apartments (owned by defendant Rafter's Square LLC.) in Nez Perce, Idaho. T.J. is a handicapped person who requires the assistance of a service animal (a cat). Upon viewing the dwelling for which she applied, she was told by an agent for the Defendant she could not reside at the Hillcrest Apartments with an animal. T.J. then requested a reasonable accommodation of the Defendant by stating that she is disabled and that her animal is prescribed for her disability. The defendant refused to honor the reasonable accommodation request. T.J.'s disability therapy technician as well as IHFC testers were also denied reasonable accommodation requests and their request for rental was denied. On behalf of T.J., the IHFC filed a complaint with HUD in July, 2009 alleging discrimination on the basis of disability and refusal to make reasonable accommodations.

On January 25, 2011 the court filed a consent order which acknowledged discrimination on the basis of disability and refusal to make reasonable accommodations. The defendant was ordered to pay monetary damages of \$13,750, attend a Fair Housing Act education class, and operate in compliance with the Fair Housing Act.

SECTION V.
Impediments and Fair Housing Action Plan

SECTION V.

Impediments and Fair Housing Action Plan

Summary of Findings

A summary of the findings from Sections II, III and IV are presented below.

Demographics. Coeur d’Alene is a growing community. Its current population of nearly 44,000 residents is the result of the city more than doubling its population in the last 30 years. Despite growth, the city has not experienced a substantial increase in racial and ethnic diversity. Racially, 95 percent of its population is white and 96 percent are ethnically non-Hispanic. Although still small in size, the city’s Hispanic population has grown since 2000 and now accounts for 4 percent of its total population, compared with 2 percent in 2000.

Since 2000, the proportion of the city’s extremely low- and low-income households has not changed, whereas the proportion of households considered middle/upper income has increased. This trend is often referred to as the “barbell effect,” where the disparity grows between the wealthiest and poorest individuals. The local job market primarily provides jobs for the city’s low and moderate income residents. According to the Idaho Department of Labor, the average weekly wage for jobs in Kootenai County is \$595 per week, which equates to annual salary of \$31,000 for full-time employment.¹ Growth in the highest income households is likely from new households moving into the community.

Housing market analysis. In the last 10 years, the distribution of rental rates in the city has shifted to include a much larger proportion of rental rates of \$500 or more. For example, in 2000, 5 percent of the city’s rental units required rents of \$750 to \$999, compared with 26 percent in 2009. Thankfully, the household income of renters has increased to accommodate for increased housing costs. Overall, renters in the city expressed satisfaction with their housing situation, but did cite challenges associated with locating affordable and quality housing opportunities.

Increased home prices are not limited to the rental market. Since 2000, the value distribution of owner-occupied homes in the city now includes a noticeably larger proportion of homes worth \$200,000 or more. Although this is good news for longtime homeowners, this creates challenges for current renters interested in homeownership.

Homeowner satisfaction was not as apparent as renter satisfaction, which aligns with the sentiment of homeowners across the country. Homeowners in the city have not escaped the fear of foreclosure and negative equity that has defined the national housing market in the last three to four years. Furthermore, homeowners participating in the survey discussed the poor quality of their homes and the need for home repairs.

¹ This calculation assumes a 52 week work year.

Resident and stakeholder survey. The majority of residents (79 percent) did not believe they have experienced discrimination in Coeur d'Alene.² Only 7 percent of respondents cited discrimination that fell under fair housing law. These discriminatory acts included discrimination because of a mental illness and familial status.

Residents understand that complaints should be formally filed when individuals experience housing discrimination. Survey respondents would be most likely to contact members of the legal community or IHFA if they wanted to file a fair housing complaint, as opposed to HUD.

Stakeholders play an important role in furthering fair housing in Coeur d'Alene. Stakeholders assist clients in finding affordable housing, and they may also assist clients in filing fair housing complaints. Sixteen percent of stakeholders said it was "somewhat likely" for their clients to experience discrimination. However, many felt that there was unreported discrimination occurring in the city, particularly related to familial status and the presence of either a physical and/or mental disability. Stakeholders identified the top three barriers to fair housing in Coeur d'Alene as the following:

- Income levels of minority and female-headed households;
- Lack of knowledge among residents regarding fair housing; and
- Lack of knowledge among small landlords regarding fair housing

Zoning, land use and housing policy review. A zoning, land use and housing policy review was completed in conjunction with a statewide AI in 2011. The statewide study revealed no fair housing barriers in Kootenai County. Coeur d'Alene provides even more options for developing density and increasing affordability, which means that no major fair housing barriers likely exist in the city, as well.

Affordable Housing and Public Housing Review. Affordable housing programs available to Coeur d'Alene residents include the Low Income Housing Tax Credit (LIHTC) program; the HOME program; the Project-Based Section 8 program; and the Section 8 Housing Choice Voucher program.

As of January 2011, there were 12 low-income housing tax credit and HOME developments in Coeur d'Alene. These developments had 554 family units, 146 units for seniors, and 108 were accessible to persons with disabilities.

Of the Project-Based Section 8 units in Coeur d'Alene, 156 are designated as family units, 210 units are set aside for the elderly, and 37 units are accessible to persons with disabilities.

The Idaho Housing and Finance Association administers the Section 8 program through four branch offices statewide, including an office in Coeur d'Alene. As of January of 2011, 366 Section 8 Vouchers were being used by households residing in Coeur d'Alene. Section 8 Vouchers play an important role in housing disabled residents in Coeur d'Alene. Currently, 223 Vouchers (61 percent) are being used by families with at least one disabled family member. The current Section 8 waitlist is extensive and requires a 3 year wait or longer for a Voucher.

² The remaining 21 percent of respondents were equally split between residents who had experienced discrimination and those that were unsure.

Fair lending analysis. Sixty-three percent of loan applications submitted by Coeur d'Alene residents in 2009 originated. Loan applications for home purchases had the highest origination rates in 2009, while home improvements had the highest denial rates. More than one in five home improvement loans were denied, indicating some difficulty in accessing home equity for home improvement projects. Only 55 percent of refinance loans originated; however, it was not entirely due to loan denial. Eighteen percent of refinance applications were denied, while 19 percent were withdrawn by the applicant.

The city's small minority population made lending analysis by race and ethnicity challenging. Despite comprising 4 percent of the total population, less than 2 percent of loan applications were submitted by Hispanic residents of the city. Loan applications submitted by Hispanic residents had higher origination rates, as well as slightly higher denial rates, because non-Hispanics were more likely to withdraw their loan applications.

Complaint and legal analysis. Residents of Coeur d'Alene file fair housing complaints directly to HUD. Eight complaints were filed with HUD in 2010 by residents of Coeur d'Alene or against persons/organizations located in Coeur d'Alene. This represents the highest number of complaints during the 10 year period examined for this study.

Nearly all complaints were filed on the basis of discrimination against a person with a disability. Discrimination against a person with a disability can include a failure to make reasonable accommodations for persons with disabilities; discriminatory terms/conditions/privileges of services or facilities; and discrimination in terms/conditions/privileges related to rental opportunities.

Positive Fair Housing Activities

Since the 2007 AI was completed the city has been active in increasing public knowledge of fair housing and has worked hard to make the city's sidewalks more accessible to persons with disabilities. Specific activities include the following:

- The city coordinates with the Intermountain Fair Housing Council to provide annual free fair housing training to the community to ensure that residents are knowledgeable about their rights under fair housing law;
- The city has a link on its website which provides fair housing resources to residents;
- City staff recently presented a fair housing education piece to the Coeur d'Alene City Council and Planning Commission, which also discussed issues related to affordable housing;
- City staff annually presents a fair housing support proclamation to the local Disability Action Center;
- A HUD equal housing opportunity poster is displayed in City Hall;
- An annual legal notice is made to announce the city's Fair Housing Resolution in support of fair housing month each April; and,

- The city has been actively working on ADA sidewalk compliance for the past three years, which includes the following activities:
 - 250 cast in place truncated domes;
 - 73 surface mounts truncated domes;
 - 10,124 square feet of sidewalk replacement;
 - 1,135 linear feet of grinding;
 - The Street Department meets annually with a committee of citizens to discuss the 5 year plan area for sidewalk enhancements, many of whom are disabled;
 - The city offers a \$500 incentive for homeowners to fix their sidewalks; and,
 - Annually, the city allocates a portion of CDBG money toward sidewalk enhancements in an LMI census tract area, and two years worth of funding was pooled and will be used for a large sidewalk project in the spring of 2011.

2011 Impediments and Fair Housing Action Plan

The following section presents the 2011 impediments and the Fair Housing Action Plan (FHAP) for Coeur d’Alene. Impediments and FHAP action items are primarily continued from the 2007 AI, but are updated to reflect more recent information and recommendations.

Summary of impediments. The following impediments were identified as part of the 2011 AI update for the city. All impediments were also presented as part of the 2007 AI, and are updated with current information.

- **Citizens could be better informed about fair housing issues.** The city offers fair housing handbooks and posters, in addition to pamphlets with local resources for housing and social services assistance. The city has actively implemented training for residents and City Council and has made a commitment to promoting fair housing throughout the community. However, as seen in the resident and stakeholder surveys, residents are still unsure where to file a fair housing complaint and stakeholders still believe discrimination goes unreported in the city.

Note: This impediment was found to exist in both 2007 and 2011.

- **Landlords, developers and HOAs would benefit from more education about fair housing laws and ADA.** As described in the 2007 AI, a review of legal cases and testing performed by the Intermountain Fair Housing Council suggests that property owners and landlords can be ignorant of many aspects of the Fair Housing Law, particularly reasonable accommodations, ADA compliance in construction, rights of persons with disabilities and rights of families. The survey conducted for the 2007 Consolidated Plan suggests that familial status and disability are the top reasons that residents are discriminated against in Coeur d’Alene. The 2011 stakeholder survey also cited familial status and disability as the top reasons that residents are discriminated against in Coeur d’Alene. As part of this AI update, HOAs are also included as an entity that could benefit from more education about fair housing laws and ADA. Housing growth in the last decade

resulted in the formation of new HOAs in many growing cities across the U.S. HOAs are guided by Covenants, Rules and Restrictions (CR&R) that must comply with fair housing guidelines, although many HOAs are unaware of fair housing law and their responsibility to comply with the law.

Note: This impediment was found to exist in both 2007 and 2011.

- **Lack of accessible sidewalks.** The city’s sidewalks are maintained by property owners in the residential and commercial developments abutting them. A condition survey in 2007 found that many sidewalks are chipped, cracked, broken and, as such, are not in a condition that persons in wheelchairs or who are sight-impaired can easily use.

Note: This impediment was found to exist in 2007.

- **Lack of accessible parking downtown.** An attendee of one of the focus groups conducted for the Consolidated Plan in 2007 mentioned that parking downtown is very difficult for persons with physical disabilities—specifically, that handicapped spots are too limited and are not in convenient locations to access downtown services.

Note: This impediment was found to exist in 2007.

Recommendations. The following Fair Housing Action Plan is recommended for the city:

- **Increase resident awareness of fair housing law and the complaint process.** The City of Coeur d’Alene should bolster its public outreach and education of fair housing laws.
 - At least once a year, the city should continue to sponsor a fair housing workshop (this might be part of another community event) that offers information about the Fair Housing Act to citizens and includes representatives from organizations that receive and process complaints. The presentations made at this workshop should be televised on the city’s public access channel.
 - In addition, the city should continue to actively distribute materials—brochures, posters and videos—about fair housing law and the complaint process through its schools, library, community centers and other similar venues. The city should change these materials frequently to keep them “fresh” and noticed. Videos and brochures are available through the Fair Housing Council of Oregon, an excellent resource on fair housing issues (<http://www.fhco.org/>). In addition, the Idaho Housing and Finance Association distributes free fair housing calendars that the city could obtain and make available at public venues (http://www.ihfa.org/fair_housing_calendar.asp).
 - The city should seek partnerships with IHFA to further fair housing education.
- **Continue to educate developers, property owners/landlords and HOAs about ADA and fair housing laws.** At least every two years, the city should sponsor a class for real estate professionals, especially developers and property owners/landlords about fair housing law and compliance. An excellent resource to conduct such a training would be the Fair Housing Council of Oregon (<http://www.fhco.org/>). The city should require the class for any developer/real estate organization receiving city funding and/or fee waivers.

The city should also reach out to HOAs in Coeur d'Alene. The city should develop a presentation and brochure targeted to Homeowners Associations (HOAs) that gives information about fair housing laws and provides examples of how HOAs might create impediments to fair housing choice and violate fair housing law in their activities. The brochures should be distributed to all HOAs who are active in the city.

- **Increase internal knowledge and resources about fair housing law.** We recommend that the city develop a fair housing resource list for distribution to all relevant departments, identify contact people within the departments, conduct fair housing training with the department contacts and coordinate distribution of fair housing materials to these contacts. Department contacts should be employees who have direct contact with the public in any capacity of housing and community development, community development or social services.
- **Continue to improve sidewalks and parking for persons with physical disabilities.** The city has a stated goal to bring its sidewalks into compliance with ADA. The city has taken a number of positive steps to improve the overall quality and increase accessibility of its sidewalks. Moving forward, the city should continue these activities. Additionally, the city should continue to work with persons in the community who are disabled to understand the problems with sidewalks and handicapped parking in downtown and other key areas of the city and explore how to make improvements to the parking situation.

Addressing HUD Concerns. As part of this AI, it has been noted that the city's residents are primarily non-minorities. For example, as seen in Section II, African American residents comprise 1 percent of the city's population and Hispanic residents comprise 4 percent. African Americans have historically had a lower median household income compared to the city overall, whereas Hispanic households have had higher median household incomes. Most recently, the median household income for Coeur d'Alene's African American and Hispanic households were \$14, 571 and \$72,988, respectively.³

The city is committed to addressing housing needs of all its residents, including its minority households. As seen in Section III (Housing Market Analysis), the city does contain a relatively expensive housing stock and has accordingly made a concerted effort to increase its stock of affordable housing units for the city's residents. These efforts are discussed in the city's Consolidated Plans, as well as in Section III under Goals 1 and 2.

As part of this AI, survey analysis and complaint analysis did not reveal lower awareness or greater fair housing violations for racial and ethnic minorities; however, outreach and education activities proposed will benefit minorities, as well as the overall population. Most barriers identified were related to protected class of disability; therefore the FHAP (discussed above) focuses on persons with disabilities.

³ Statistic for African American households was from the ACS 2005-2009 5-year estimate, as it was not available in the ACS 3-year estimate. Statistic for Hispanic households was from ACS 2007-2009 3-year estimate.

Timeline, Oversight, Monitoring and Evaluating the Implementation of the FHAP and HUD Concerns

Figure V-1 on the following page summarizes the timeline that will be used by the city to implement the FHAP, as well as address HUD concerns.

**Figure V-1.
Implementation Timeline for FHAP and HUD Concerns**

FHAP Action Item	Impediments Addressed	Activities	Goals					Accomplishments				
			2011	2012	2013	2014	2015	2011	2012	2013	2014	2015
Increase resident awareness of fair housing laws and the complaint process.	<ul style="list-style-type: none"> ▪ Citizens could be better informed about fair housing issues. ▪ Landlords, developers and HOAs would benefit from more education about fair housing laws and ADA. 	<ul style="list-style-type: none"> ▪ City will continue annual sponsorship of the free fair housing training, open to the general public. ▪ City will continue to provide valuable housing links on its website ▪ City will continue to provide an annual Fair Housing Month proclamation. 	1	1	1	1	1	1				
			1	1	1	1	1	1				
			1	1	1	1	1	1				
Continue to educate developers, property owners, landlords and HOAs about ADA and fair housing laws.	<ul style="list-style-type: none"> ▪ Citizens could be better informed about fair housing issues. ▪ Landlords, developers and HOAs would benefit from more education about fair housing laws and ADA. 	<ul style="list-style-type: none"> ▪ City will continue to utilize the local PEG channel to air fair housing commercials and educational PSAs. ▪ City will work with other agencies to assemble an informational brochure to hand out at meetings and other venues. 	1	1	1	1	1	1				
			0	1	1	1	1	0				
Increase internal knowledge and resources about fair housing law.	<ul style="list-style-type: none"> ▪ Citizens could be better informed about fair housing issues. 	<ul style="list-style-type: none"> ▪ City to continue to provide PEG channel educational material, brochures and annual free trainings to the public. 	1	1	1	1	1	1				
Continue to improve sidewalks and parking for persons with physical disabilities.	<ul style="list-style-type: none"> ▪ Lack of accessible sidewalks. ▪ Lack of accessible parking downtown. 	<ul style="list-style-type: none"> ▪ City will continue its sidewalk enhancement projects and ADA sidewalk improvements annually, geographic locations planned for five years (est. annually 6,500 lineal feet of sidewalk poured/replaced with associated ped ramps) ▪ City will have the Parking Commission to review the downtown parking and make recommendations. The city is currently master planning the main city parking lot, which serves the downtown area. 	1	1	1	1	1	1				
			0	1	1	1	1	0				
HUD Concerns	Impediments Addressed	Activities	Goals					Accomplishments				
			2011	2012	2013	2014	2015	2011	2012	2013	2014	2015
Address housing needs of racial and ethnic groups.	<ul style="list-style-type: none"> ▪ Citizens could be better informed about fair housing issues. 	<ul style="list-style-type: none"> ▪ Continue efforts to construct affordable housing in the city, as discussed in Goals 1 and 2 in Section III of AI 	1	1	1	1	1	1				

Source: BBC and the city of Coeur d'Alene.

The completion of this AI was overseen the city of Coeur d'Alene's staff. The city will be ultimately responsible for carrying out the Fair Housing Action Plan. To ensure that each activity is carried out, the city will conduct an evaluation of each activity during each program year and identify additional areas that require study or analysis and how to address the additional areas. As part of the annual Consolidated Annual Performance and Evaluation Report (CAPER), the city will include a summary of the following:

- Actions taken to affirmatively further fair housing;
- A summary of impediments to fair housing choice in the Analysis of Impediments (AI); and
- Identify actions taken to overcome effects of impediments identified in the AI.

Per Section 2.14 in HUD's Fair Housing Planning Guide, the city will maintain the following data and information as documentation of the city's Fair Housing Action Plan:

- A copy of the AI and any updates.
- A list of actions taken each year as part of the Fair Housing Action Plan to eliminate the impediments identified in the AI.

APPENDIX A.
Land Use Regulations as Barriers to
Affordable Housing

APPENDIX A.

Land Use Regulations as Barriers to Affordable Housing

Introduction

The ability of private real estate markets to meet affordable housing needs is strongly affected by zoning, subdivision, and land development regulations adopted by local governments. In many cases, local regulations that are intentionally or unintentionally exclusionary can offset the impact of affordable housing subsidies or increase the amount of subsidies necessary for the market to meet affordable housing needs.¹ In *Zoned Out*, analyst Jonathan Levine recently documented the impact of zoning regulations on the supply of affordable housing, and his findings confirm the conclusions of several earlier studies.

For example, a 1998 study of regulatory barriers to affordable housing in Colorado identified five separate types of barriers, including zoning and subdivision controls.² The other areas were development processing and permitting, infrastructure financing mechanisms, building codes, and environmental and cultural resource protection tools. In the area of zoning and subdivision, the Colorado study identified four specific types of barriers:

- Minimum house size, lot size, or yard size requirements;
- Prohibitions on accessory dwelling units;
- Restrictions on land zoned and available for multifamily and manufactured housing; and
- Excessive subdivision improvement standards.

Similarly, in 2007, a nationwide study prepared by the National Association of Home Builders for the U.S. Department of Housing and Urban Development documented which types of subdivision regulations have the greatest impacts on housing costs.³ After establishing benchmark standards representing their estimates of the minimums necessary to protect public health and safety, the study compared the cost of building single family housing under those benchmark standards with actual costs of home construction. The study concluded that:

¹ Levine, Jonathan, *Zoned Out* (RFF Press, Washington, D.C., 2006).

² Colorado Department of Local Affairs, *Reducing Housing Costs through Regulatory Reform* (Denver: Colorado Department of Local Affairs, 1998).

³ *Study of Subdivision Requirements as a Regulatory Barrier*. EcoNorthwest, for National Association of Homebuilders Research Center, 2007.

- 65 percent of the added costs were caused by minimum lot size requirements; and
- 9 percent of the added costs were caused by lot width requirements.

A third contributor was minimum house size requirements. Although only eight percent of local governments impose those controls, they were responsible for 17 percent of the added costs in those cities and counties that use them. Using 2004 data, the study concluded that subdivision regulations exceeding baselines for public health and safety added an average of \$11,910 (4.8%) to the price of a new home.

In addition, in *U.S. ex. rel. Anti-discrimination Center v. Westchester County*⁴, a U.S. District Court confirmed that local government eligibility for federal Community Development Block Grant Funds requires certification that the city or county is in compliance with the federal Fair Housing Act Amendments of 1988. That, in turn, requires that the local government (a) conduct an analysis of impediments to fair housing, (b) take actions to address the effects of those impediments, and (c) maintain records of the analysis and the steps taken. In addition to barriers based on income, the analysis cannot ignore issues of racial segregation or the role of public resistance in perpetuating economic or racial segregation.

For all of these reasons, it is important that local governments review their zoning, subdivision and land development regulations to ensure that they do not create barriers to private production of affordable housing, and that they include appropriate tools that could spur private production of affordable housing to fill identified gaps in housing supply.

This following information is organized into three sections:

- General Guidance on Avoiding Barriers to Affordable Housing
- County-by-County Review of Land Use Regulations
- Idaho Summary and Conclusions

General Guidance on Avoiding Barriers to Affordable Housing

Because the character, development patterns, and future plans of each county are different, their zoning, subdivision, and development controls will also differ. No two county codes could or should read alike. However, there are several land use practices that can help reduce barriers to housing choice, and counties should review their regulations to ensure that they do not include unintentional barriers in these areas. In some cases, the most appropriate areas for some of these tools to be implemented may be in existing urbanized areas or near incorporated towns and cities.

⁴ 495 F.Supp.2nd 375 (S.D.N.Y. 2007).

County land use regulations that attempt promote housing choice should include as many of the following tools as is consistent with the county's future development plans. While it is not necessary that each county code include all of these types of provisions, including more of them will further reduce barriers to housing choice.

- **Purpose Statement.** The code should reflect the county's purpose to provide housing choice for its residents and to comply with applicable federal and state law regarding housing choice.
- **Small Lots.** At least one zone district (or overlay district, or permit system) that allows small lots for single family detached housing in some locations. While the appropriate minimum lot size will vary with the character of the county, a zone allowing minimum lot sizes in the 3,000-6,000 square foot range would be appropriate for more urbanized areas of many counties. In addition, lot width requirements should be reasonable and consistent with minimum lot sizes; while some codes require minimum lot widths of 70 feet or more, small homes can be constructed on lots as narrow as 40 feet (or even less). Minimum lot size requirements are the type of regulation most responsible for increasing housing costs.
- **Multi-family Parcels.** At least one zone district (or overlay district, or permit system) that allows the construction of multi-family housing, and mapping enough land into this district to allow a reasonable chance that some multi-family housing will be developed. In many rural counties, these mapped areas may be close to incorporated or urbanized areas. Maximum heights should be reasonable and consistent with the maximum density permitted; avoid mapping areas for multi-family densities and then imposing height restrictions that prohibit efficient development at those densities. Failure to provide opportunities for multi-family development has been identified as one of the four leading regulatory causes of increased housing costs.
- **Manufactured Homes.** Manufactured housing meeting HUD safety standards should be allowed somewhere (per the federal Manufactured Housing Act of 1974). While restricting these homes to manufactured home parks is common, the better practice is to allow them in at least one residential zone where the size and configuration matches the scale and character of the area.
- **Minimum House Sizes.** The zoning and subdivision regulations should not establish minimum house or dwelling unit sizes (beyond those in the building code). Minimum house size requirements have also been identified as a significant cause of increased housing price in those communities where they are in place.
- **Group Housing.** The code should clarify that housing for groups protected by the Fair Housing Act Amendments of 1988 are treated as residential uses, and should generally allow those group housing uses in at least one residential district. While some communities require a special permit for these uses, others find that they can be allowed by right provided that they comply with standards limiting scale, character, and parking.

Failure to provide for these uses in the code could subject the county to a developer's request for "reasonable accommodation" under the Act, and failure to provide "reasonable accommodation" could be a violation of federal law. In light of the aging of the American population, the code should also provide areas where congregate care, nursing home, and assisted living facilities may be constructed.

- **Accessory Dwelling Units.** The code should allow accessory dwelling units in at least one zone district – either as an additional unit within an existing home structure or in an accessory building on the same lot. While some communities require a special permit for these uses, others find that they can be allowed by right provided that they comply with standards limiting scale, character, and parking.
- **Mixed Use.** In order to promote affordability, housing should be allowed near businesses that employ workers, particularly moderate and lower income employees. To do that the code should permit residential units in at least one commercial zone district or should map some lands for multi-family development in close proximity to commercial districts.
- **Lower Parking Standards.** Although the traditional standard of two parking spaces per dwelling unit may be reasonable for many areas of a county, a lower standard can and generally should be used for affordable housing, multi-family housing, group housing, and special needs housing.
- **Flexibility on Nonconforming Structures.** Although zoning codes generally require that nonconforming structures damaged or destroyed through fire or natural causes can only be rebuilt in compliance with the zoning code, an increasing number of codes are exempting affordable housing from this requirement. Often the most affordable housing in a community is located on lots that are too small or narrow for the district where they are located, or in multi-family buildings that have too many units for the district where they are located. If forced to replat with larger lots or to reduce density following a disaster, those affordable units may be lost, and allowing rebuilding with the same number of units as before may be the most efficient way to preserve these units in the housing stock.
- **Incentives.** In order to encourage the development of affordable housing, the code should recognize the difficult economics involved and should offer incentives. Common incentives include smaller lots, increased density in multi-family areas, reduced parking requirements, or waivers or reductions of application fees or development impact fees. Some communities provide additional incentives for housing that is restricted for occupancy at lower percentages of the Area Median Income (AMI). For example, developments restricted for households earning less than 50% of AMI could receive more generous incentives than those for households earning less than 80% of AMI. While zoning and subdivision incentives alone are often not enough to make development for lower levels of AMI economically feasible, they can be part of a broader package of incentives (for example, including financial incentives or land contributions) that make those project feasible. Any incentives offered should be updated as new

housing studies are completed and new information about specific affordable housing needs is obtained.

- **Growth Management Exemptions.** Most communities that operate a growth management system exempt affordable housing or allow it to compete for a separate pool of development rights in order to encourage this type of housing.