

**City of Pocatello**

Pathways to Removing Obstacles to Housing (PRO Housing)

Grant Application

Round Two

DRAFT

## Exhibit A Executive Summary

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The City of Pocatello, ID has been a Community Development Block Grant (CDBG) entitlement community since 1997. As an entitlement Community, the City is charged with implementing a Consolidated Plan that addresses housing and other homeless and non-homeless special needs for low- and moderate-income residents in the City's area of impact. With over 25 years of experience managing an administering this program through the U.S. Department of Housing and Urban Development (HUD), the City is poised to implement the PRO Housing program to further its efforts for preserving and expanding affordable housing and affordable housing opportunities for the City's residents.

Through the HUD Community Planning and Development Pathways to Removing Obstacles to Housing (PRO Housing) competitive grant program, the City of Pocatello will be able to complete housing studies and housing production plans for its core neighborhoods which are home to the City's target populations for the CDBG program. Funding will additionally be used to implement recommendations from the housing and neighborhood specific plans while also expanding current services offered by the City's HUD-funded programs, such as property rehabilitation grants and loans, lead-based paint remediation, acquisition and disposition of real property, and down payment assistance. The City proposes this three-prong approach – Plans, Project, and Activities – to ensure a longer-term approach to addressing affordable housing needs while also responding to the current acute demand. With PRO Housing funding totaling \$2.6M and an additional \$1.89M in leveraged funding, the City will be able to complete a citywide housing study, complete 6 neighborhood plans, implement specific action plan projects, provide up to 90 grants or loans to homeowners for property rehabilitation work, install approximately 9,000 feet of sidewalk, acquire parcels for redevelopment, and provide down payment assistance for up to 20 homeowners.

Ultimately, the Pocatello PRO Housing proposal will preserve existing affordable housing while planning for and expanding affordable housing for the City's low- and moderate-income residents.

## **Exhibit B Threshold Requirements and Other Submission Requirements**

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## **1. Resolution of Civil Rights Matters**

N/A - The City of Pocatello does not have any outstanding civil rights matters as described in Section III.D. 1. Subsections a and b.

The City of Pocatello is a municipal corporation and therefore is an eligible applicant per section III.A. classification 02 (City or township government).

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### **Affirmatively Furthering Fair Housing**

The City will carry out the proposed activities in a manner that affirmatively furthers fair housing in compliance with the Fair Housing Act and its implementing regulations, per the application and the City's adopted Analysis of Impediments (AI). The adopted AI is available here: <https://www.pocatello.gov/DocumentCenter/View/8481/Analysis-of-Impediments-to-Fair-Housing-PDF?bidId=>

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## **2. Other Program-Specific Requirements**

### **a. Limited English Proficiency (LEP)**

The City acknowledges the Final Guidance to Federal Financial Assistance Recipients Regarding Title VI, Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons published on January 22, 2007, in the Federal Register (72 FR 2732) and will ensure compliance with the LEP requirements.

### **b. Physical Accessibility**

The City will ensure compliance with Physical Accessibility requirements. Including: that all meetings that are held in person must be held in facilities that are physically accessible to persons with disabilities. Where physical accessibility is not achievable, Applicants and partners must give priority to alternative methods of product or information delivery that offer programs and activities to qualified individuals with disabilities in the most integrated setting appropriate in accordance with HUD's implementing regulations for section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794) at 24 CFR Part 8 and all applicable laws and regulations. In addition, all notices of and communications during all training sessions and public meetings shall be provided in a manner that is effective for persons with hearing, visual, and other communication-related disabilities or provide other means of accommodation for persons with disabilities consistent with section 504 of the Rehabilitation Act of 1973 and HUD's section 504 regulations. See 24 CFR section 8.6.

### **c. Environmental Review**

The City acknowledges the Environmental Review requirements and that all PRO Housing grantees must comply with applicable environmental requirements related to any awarded funds. This includes complying with environmental justice requirements as set forth in HUD's regulations at 24 CFR parts 50 and 58, which implement the policies of the National Environmental Policy Act (NEPA) and other environmental requirements. Grantees who are States or units of general local government (UGLGs) are considered the Responsible Entity under 24 CFR part 58 and are responsible for completing their own environmental review.

### **d. Federal Assistance Assurances**

The City has completed the Federal Assistance Representations and Certifications section of its sam.gov registration.

### **e. 424-CBW budget form**

See Attachment D

**Exhibit C – Need**

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Adequate, attainable affordable housing remains an issue across the United States, and is no different in Pocatello, ID. As a CDBG entitlement community since 1997, the City has worked to address housing needs for low- and moderate-income residents through a variety of programming efforts. The City's PRO Housing project proposal will work to overcome local barriers that inhibit affordable housing production and preservation through the implementation of housing studies, needs analysis, and plans as well as expansion of existing programs. These studies will result in strategies that will review and update any existing land-use regulations, permitting, or procedural issues, or a need for progressive, new incentives to ensure the creation of affordable housing. Concurrently, the City will expand its programming that preserves the existing affordable housing stock to mitigate displacement of residents and create housing stability.

**i. Demonstrate your progress and commitment to overcoming local barriers to facilitate the increase of affordable housing production and preservation, primarily by having enacted improved laws and regulations.**

**a. Improved laws, regulations, or land use local policies**

Through the City of Pocatello's CDBG Program, the Neighborhood and Community Services (NCS) Division within the City's Planning and Development Services Department works in conjunction with local non-profit partners to identify, address, mitigate, and remove barriers to affordable housing production and preservation.

Since 1997, Pocatello has been a recipient of CDBG entitlement funding. As an entitlement community, the City is required to adopt a 5-year Consolidated Plan (Con Plan) to guide CDBG activities and expenditures. The Con Plan identifies the City's greatest needs for its low- and moderate-income populations. The City's most recent two Consolidated Plans, covering program years 2017-2021 and 2022-2026, identified affordable housing as the top priority for CDBG funding in both plans. The Consolidated Plan planning process involved data review and analysis as well as extensive public engagement to identify this need. The City reviewed Comprehensive Housing Affordability Strategy (CHAS) data to identify housing needs for its 2022-2026 Con Plan. According to the 2013-2017 ACS data tables, which were used for the 2022-2026 Con Plan, there are 20,550 households in Pocatello. Of those total households, 5,422 households comprised of renters and homeowners have a housing cost burden of over 30%. This accounts for 26% of total households. In other words, one in every four households in the City is cost burdened. The challenges with cost burden fall most severely upon low-income renters necessitating programs to address access to and preservation of affordable housing.

In addition to the CDBG-specific Consolidated Plan, the City recently completed the development and adoption of its citywide Comprehensive Plan 2040: Our Valley | Our Vision<sup>1</sup>. The Comprehensive Plan involved extensive community engagement and outreach in order to develop the 20-year vision for the future of Pocatello. Primarily, the Comprehensive Plan adopts Vision Elements to address the identified needs for the community. Included as one of the seven elements is "Authentic & Affordable Neighborhoods". The goals of this vision element include:

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<sup>1</sup> <https://comprehensive-plan-2040-pocatello.hub.arcgis.com/>

1. Create Complete Neighborhoods by implementing development criteria informed by unique neighborhood plans.
2. Conduct intentional, equitable, and measurable neighborhood planning.
3. Create a Housing Study that will provide guidance on housing needs for each neighborhood.
4. Assist those who are un-housed or otherwise in need to help prevent their involuntary displacement.
5. Develop form-based code standards to guide new development within each neighborhood.
6. Preserve the authenticity of Pocatello's neighborhoods and celebrate our history, architecture, and culture.

All of these goals were developed during the Comprehensive Plan planning process which took place over 18 months, utilizing concerted, specific community engagement to ensure the outcomes and goals match the community's needs. Engagement strategies included a community values survey, open houses, and community events. The public engagement process included a dedicated Comprehensive Plan website and media release as well as tabling at community events and open houses. City Staff attended community organizations' meetings and developed a focus group. The focus group was composed of 12 volunteer community members and met between 2021 and 2023. The group served as community engagers and also provided feedback, specifically on draft versions of the plan. The City attended 20 outreach events, hosted 8 open houses with 250 participants, received 270 responses to the "favorite places survey", and 864 responses to a values survey. The plan went before City Council multiple times at several City Council Work Sessions and had three public hearings at regular City Council meetings. The plan was formally adopted in July of 2023.

This engagement and outreach demonstrates that the plan was informed by the residents and key stakeholders in the community. The Vision Elements are reflective of the needs in the community, and as Vision Element "Authentic & Affordable Neighborhoods" shows, there are action steps and strategies directly linked to production and preservation of affordable housing that the PRO Housing program can address. The Comprehensive Plan is the framework and guiding document that begins addressing those barriers, specifically through the adoption of the Plan and its included Future Land Use Map, Form Based Code recommendations, and plan recommendations.

Apart from funded programs, the City has undertaken many zoning code changes that alleviate regulatory burdens and promote construction of housing. Specifically, the City has worked to streamline processes to allow for multi-family housing or mixed-use by right in most zoning districts. Multi-family and mixed-use encourages economic development but also encourage the construction of more units which can increase the overall housing stock and alleviate some impacts the supply and demand issue has had on affordability of housing.

Since 2020, the City has adopted six ordinances for text amendments to the Zoning Regulations. This includes: allowing residential uses to be permitted outright in Commercial General (CG), Central Commercial (CC), and Light Industrial (LI) Zones; amending the Residential High Density (RH) and Residential Commercial Professional (RCP) districts to resolve a regulation that would prohibit duplexes but allow triplexes and fourplexes; remove building height requirements in the Original Townsite Overlay; expediting the Accessory Dwelling Unit approval process to an Administrative Review instead of a Conditional Use Permit; simplifying parking standards by land

use to make the standards less restrictive; adjusting dimensional standards to make them less restrictive and allow for greater maximum heights in CC, Office Park (OP), LI, Industrial (I), CG, and RCP zones; increasing flexibility for infill development and streamlining infill development standards for residential and multifamily infill; and clarifying language to classify household living, group living, boarding/rooming house, transitional housing, and shelter housing definitions in accordance with uses.

The City has worked hard to adopt these text amendments and update its zoning to make the process of constructing housing, particularly multifamily housing, by right as easy as possible and require fewer restrictions. For example, in Residential High Density (RH) districts, accessory dwelling units (ADUs), duplexes, and triplexes are allowable by right. In the Light Industrial (LI) and Commercial General (CG) zones, housing is allowable by right as long as there is an accompanying commercial use on the street front of the parcel (either on the lower story or in a detached building with the dwelling units in the rear). The City's Warehouse District is specifically identified in the code as allowing residential uses.

**b. Other recent actions taken to overcome barriers to facilitate the increase of affordable housing production and preservation**

The City also conducts activities each year through the CDBG program to address and remove barriers to affordable housing production and preservation. Through this annual entitlement funding, the City has operated the "Revitalizing Existing Neighborhoods through Enhancement, Work, and Livability" or RENEWAL program. The RENEWAL Program provides low-and-moderate income households with loans or grants to complete property rehabilitation work. The RENEWAL program offers qualifying applicants grants up to \$5,000 for repairs and 0% interest loans to homeowners for improvements in excess of \$5,000. In addition, the RENEWAL program provides grants for sidewalk repairs for individual property owners. Since 2013, the City has issued a total of 56 RENEWAL Loans for a total of \$659,267.64. The funding has assisted 14 homeowners with incomes less than 30% area median income (AMI) also known as extremely low income, 18 loans for those with incomes between 30% AMI and 50% AMI (low-income), and 24 loans for those with incomes less than 80% AMI but greater than 50% AMI (low income). In the most recent program years, from April 1, 2017 through March 31, 2023, the City has completed 78 RENEWAL grants, awarding \$211,166.52 in property rehabilitation work.

RENEWAL program repairs range from sewer line repairs to roof replacements, as well as projects that address health and safety concerns such as lead-based paint mitigation and critical repairs to preserve the integrity of the home such as subfloor replacement, water damage repair, or mold mitigation. The program not only provides vital funding to the property owner who otherwise may not be able to afford the repairs, but also offers a funding mechanism for those that traditionally cannot qualify for conventional lending. Of similar importance, the rehabilitation work results in the preservation of the City's affordable housing stock, ensuring that its low- and moderate-income residents can remain in their homes and have viable, not substandard living conditions. Repairs to these homes also ensure that the neighborhood housing is maintained and improves property values for those in the areas as well. Often this work results in code compliance, health and safety improvements, and overall improved quality of life.

The RENEWAL program's sidewalk repair grants also address affordable housing preservation, as these repairs are often extremely costly and are the responsibility of the homeowner per City of Pocatello code. Residents rarely can afford remediating sidewalk code violations. Further, degraded and deteriorating sidewalks inhibit mobility and accessibility for those with mobility impairments. This can affect resident's abilities to access jobs, recreating opportunities, facilities, resources, and more. The RENEWAL program provides a funding mechanism to address ADA-compliance and improve mobility and accessibility for not only the resident, but the neighborhood as a whole.

The RENEWAL program also provides funding for acquisition of infill lots along with down payment assistance. Through a partnership with local non-profit housing providers, such as Gateway Habitat for Humanity and NeighborWorks Pocatello, the City has been able to use CDBG funding to purchase infill lots, complete demolition or clearance of the lots to prepare for the construction of affordable housing, and offer down payment assistance to the qualifying homebuyer. Through this program, the City has been able to work with the program partners to assist 31 low- and moderate-income beneficiaries with the purchase of housing, including 23 clients who received down payment assistance. This eliminates a major barrier to homeownership for the target population.

In addition to the RENEWAL Program, the City funds several local non-profit partners and supports their housing programs through a variety of mechanisms. As noted, one major partner is NeighborWorks Pocatello (NWP). NWP is a subrecipient of CDBG funding and they provide grants and small loans to mobile home owners who otherwise would not qualify for conventional lending, as loans on mobile homes are unsecured. Through CDBG, NWP is able to provide grants up to \$3,000 for repairs and additional loans funding up to \$6,000 for repairs in excess of the grant. The NeighborWorks Mobile Home Program has provided 53 grants since program year 2019, for a total investment of \$178,803 in CDBG dollars for grants and program service delivery. Mobile homes provide some of the City's most affordable housing stock, particularly for elderly clients and those receiving Social Security Income (SSI) and Social Security Disability Insurance (SSDI). In addition, NWP has worked to construct affordable housing throughout the community to increase the available stock of affordable homes. The City has partnered with NWP through the acquisition of infill or vacant lots and the demolition programs.

Similar programs have been implemented with the Gateway Habitat for Humanity, who has constructed a home through the assistance of CDBG program funds for acquisition. Habitat also operate small grant program for property rehabilitation, specifically to address accessibility issues in homes such as ADA-compliant ramps, doorways, handrails and other similar work.

Beyond acquisition and infill the City has also assisted NWP with two recent developments: Park Meadows Senior Apartments and Bonneville Commons. The City provided CDBG funding toward the Park Meadows Senior Apartments Low Income Housing Tax Credit (LIHTC) application for planning expenses. NWP was successful in being awarded the LIHTC which has allowed them to move forward with the construction of Park Meadows. The project will provide 49 units for low-income senior citizens including four units for homeless seniors. NWP also constructed the Bonneville Commons development which reused the site of a former elementary school in one of the City's core neighborhoods, Bonneville, which is a low- and moderate-income area. Bonneville

Commons will feature the construction of 12 single family homes, four twin homes, and two triplexes of which 4 units (two twin homes and two single family homes) will be income restricted for those earning 80% or less than Area Median Income. The City worked with NWP on the proposed development. The proposal was supported by PDS staff and approved by City Council. The City's CDBG Consolidated Plan goals include supporting projects that address other barriers to maintaining affordable housing or to mitigate factors that affect one's ability to stay housed. By addressing these goals to create a suitable living environment and expand opportunities for low- and moderate-income persons, the City is mitigating negative impacts on affordable housing preservation and providing decent housing to LMI persons. The City accomplishes this through CDBG-funded public infrastructure, public facility, and public service projects. The City implements these projects primarily through partnerships with local non-profit agencies.

From program years 2017-2023, the City has partnered with **fourteen** different local non-profit agencies to implement programs that assist a variety of clientele meeting the CDBG Low- and moderate-income clientele national objective. These programs included public service and public facility projects. A summary of those activities is as follows:

**Table 1: Summary of CDBG-Funded Activities and Beneficiaries**

| <b>Program Year</b> | <b>Agency</b>                              | <b>Public Service Program or Facility Improvement</b>           | <b>Number of Beneficiaries</b> |
|---------------------|--------------------------------------------|-----------------------------------------------------------------|--------------------------------|
| 2017                | Aid For Friends                            | Pocatello Regional Transit Bus Tickets for Homeless Individuals | 203                            |
|                     | Pocatello Regional Transit                 | Bus Shelter                                                     | 1                              |
|                     | Senior Activity Center                     | Facility Upgrades                                               | 1102                           |
|                     | New Day Products                           | Facility Repairs                                                | 40                             |
|                     | Family Services Alliance                   | Facility Repairs                                                | 1,092                          |
|                     | Aid for Friends                            | Facility Upgrades                                               | 406                            |
| 2018                | Bannock Youth Foundation                   | Roof                                                            | 237                            |
|                     | Family Services Alliance                   | Facility                                                        | 1,070                          |
|                     | Senior Activity Center                     | Facility                                                        | 1,096                          |
|                     | Aid for Friends                            | Bus Tickets                                                     | 93                             |
| 2019                | Bannock Youth Foundation                   | Electrical                                                      | 237                            |
|                     | New Day Products                           | Roof                                                            | 116                            |
|                     | Aid for Friends                            | Shelter Acquisition                                             | 352                            |
|                     | Aid for Friends                            | PRT Tickets                                                     | 118                            |
| 2019 – CDBG CV      | Senior Activity Center                     | Nutrition Program                                               | 213                            |
|                     | Housing Alliance and Community Partnership | Ready to Rent program                                           |                                |
|                     | United Way                                 | Planning                                                        | 2846                           |
|                     | St. Vincent de Paul                        | Social Services                                                 | 36                             |
|                     | Big Momma's House                          | Emergency Assistance                                            | 11                             |

|              |                                            |                              |               |
|--------------|--------------------------------------------|------------------------------|---------------|
|              | New Day Products                           | Transportation Services      | 85            |
|              | Pocatello Free Clinic                      | Facility Upgrades            |               |
| 2020         | St. Vincent de Paul                        | Social Services              | 98            |
|              | CASA                                       | Roof                         | 322           |
|              | Aid for Friends                            | Shelter Acquisition          | 310           |
|              | New Day Products                           | Roof                         | 116           |
|              | Aid for Friends                            | PRT Tickets                  | 33            |
| 2021         | St. Vincent de Paul                        | Facility                     | 70            |
|              | Salvation Army                             | Rental Assistance            | 17            |
|              | New Day Products                           | Transportation Services      | 85            |
|              | NeighborWorks Pocatello                    | LIHTC                        | n/a           |
|              | Bannock Youth Foundation                   | Roof                         | 24            |
|              | Family Services Alliance                   | Foundation                   | 2134          |
|              | Aid for Friends                            | PRT Tickets                  | 83            |
|              | Aid for Friends                            | Case Management              | 135           |
|              | St. Vincent de Paul                        | Social Services              | 244           |
| 2022         | Housing Alliance and Community Partnership | Eviction Prevention          | 1             |
|              | Housing Alliance and Community Partnership | Move to Work                 | 42            |
|              | Senior Activity Center                     | Nutrition Program            | 314           |
|              | Salvation Army                             | Hunger Relief                | 105           |
|              | New Day Products                           | Transportation Services      | 96            |
|              | Aid for Friends                            | PRT Tickets                  | 117           |
|              | Aid for Friends                            | Case Management              | 312           |
|              | St. Vincent de Paul                        | Facility Updates – Food Bank | 70            |
|              | St. Vincent de Paul                        | Social Services              | 70            |
|              | Aid for Friends                            | Shelter Acquisition          | 416           |
| <b>TOTAL</b> |                                            | <b>45 Agency Activities</b>  | <b>14,568</b> |

Outside of CDBG-funded work, the Neighborhood and Community Services Division also administers a U.S. Department of Housing and Urban Development (HUD) Lead Hazard Control and Healthy Homes grant through HUD's Office of Lead Hazard Control and Healthy Homes (OLHCHH). The City's Lead Safe and Healthy Homes (LSHH) program provides grants to qualifying low- and moderate-income homeowners and renters for lead-based paint hazard mitigation as well as supplemental funding for work qualifying under the Healthy Homes Supplemental Funding program. These grants preserve and update the existing affordable housing stock as well as ensure the homes are lead-safe for future occupants. The Healthy Homes program provides health and safety upgrades ranging from smoke and carbon monoxide detectors to handrails, radon mitigation, and window repairs. In FY17 the City was awarded an approximate \$1.5M grant from OLHCHH and was able to conduct 55 Lead Inspection/Risk Assessments and mitigate hazards in 44 units. The City was awarded a second grant for the LSHH program in 2021 for over \$2.6M and thus far has completed 28 Lead Inspection/Risk Assessments and mitigated hazards in 22 units.

The City works closely with other local partners to address housing concerns, particularly related to affordable housing for low- and moderate-income residents as well as Fair Housing concerns. The City works with its Housing Authority, the Housing Alliance and Community Partnership (HACP), to promote its programs as well as collaborate on Fair Housing training for landlords and tenants. The City used CDBG Planning funds to support a landlord training hosted by HACP in 2022. In 2023 and 2024, the City partnered with Idaho Falls and the Intermountain Fair Housing Council to conduct a Fair Housing training as well. Further, Pocatello promoted Fair Housing month in April with both a Proclamation at City Hall and a social media campaign for the broader public. The City's NCS Staff serve as the Fair Housing Act points of contact for the City and field calls, emails, and other inquiries related to the Fair Housing Act. The City sits on the Idaho Fair Housing Forum as well. Fair Housing efforts are directly linked to ensuring low- and moderate-income residents have access to affordable housing, as the protected classes covered by the FHA often overlap and are comprised of the same target populations. For example, women experiencing domestic violence are a presumed benefit under the CDBG program and are protected by the Fair Housing Act.

These efforts were established as part of the City's CDBG program, primarily stemming from the Consolidated Plan. The Con Plan takes into consideration a needs assessment and market analysis as well as extensive public outreach to ensure that the programs are targeting the needs of the community, and in particular the needs of the City's vulnerable populations.

Overall, between specific programming and procedural changes in the City's Planning and Development Services Department, Pocatello has worked hard to address affordable housing concerns. However, funding is limited, particularly that used in the CDBG program, and as such additional funds are needed to develop longer term housing strategies and bolster current efforts.

ii. **Do you have acute demand for affordable housing? What are your remaining affordable housing needs and how do you know?**

While Pocatello is not listed as a priority geography per the PRO Housing NOFO, the City meets several metrics that indicate there is an acute demand for affordable housing.

As noted, the City reviewed Comprehensive Housing Affordability Strategy (CHAS) data to identify housing needs for its 2022-2026 Con Plan. The 2013-2017 CHAS data shows that Pocatello has a population mix of 79% families and elderly households and 21% single-person households and single-person households demonstrate the following:

- Single-person households comprise 46% of extremely low-income households (0-30% HUD Area Median Family Income (HAMFI))
- Single-person households are 33% of very low-income households (>30-50% HAMFI)
- Single-person households comprise 28% of low-income households (>50-80% HAMFI)

For single-person renter households:

- Single-person households represent 47% of RENTERS with a cost burden.
- 52% of single-person household renters have a cost burden and are extremely low-income.

- Single persons experience a disproportionate housing cost burden across all income categories as renters.
- They are much more likely to be in a lower-income bracket and likely to have a cost burden.

According to the 2013-2017 ACS data tables, there are 20,550 households in Pocatello. Of those total households, 5,422 households comprised of renters and homeowners have a housing cost burden of over 30%. This accounts for 26%, or 1 in every 4 households experiencing a housing cost burden. The challenges with cost burden fall most severely upon low-income renters. The most common housing problems for renters are as follows:

- 3,179 low- to moderate-income (LMI) renter households have a housing cost burden greater than 30% accounting for 15% of all households in Pocatello.
- 1,650 LMI households are renters with housing cost burden greater than 50%
- 230 LMI renters have substandard housing
- 170 LMI renters live with overcrowding
- 65 LMI renters live with severe overcrowding

The most common housing problems for homeowners include:

- 2,752 LMI homeowners have a housing cost burden greater than 30%
- 743 LMI homeowners have a housing cost burden greater than 50%
- 65 LMI homeowners live in substandard housing
- 110 LMI homeowners live with overcrowding
- 10 LMI homeowners live with severe overcrowding

By definition, and when reviewing data for Pocatello, households that have worst-case needs are households that:

- Are renters;
- Have very low incomes—incomes of no more than 50 percent of the area median income (adjusted for family size); and
- Do not receive housing assistance.

Looking at more recent data, the National Low-Income Housing Coalition published its “Out of Reach”<sup>2</sup>. Based on Out of Reach, Pocatello has 32,062 households, of which 10,170 or 32% are renters. The following chart shows a comparison of Housing Wage, Fair Market Rent, and Annual Income Needed to afford the fair market rents:

**Table 2: Rent, Wages, and Annual Income per Rental Unit Size**

|                   | <b>Fair Market Rent</b> | <b>Housing Wage</b> | <b>Annual Income Needed to Afford Rent</b> | <b>Work Hours/Week at Minimum Wage (\$7.25)</b> |
|-------------------|-------------------------|---------------------|--------------------------------------------|-------------------------------------------------|
| Zero-Bedroom (BR) | \$669                   | \$12.87             | \$26,760                                   | 71                                              |

<sup>2</sup> <https://nlihc.org/oor/state/id>



|        |         |         |          |     |
|--------|---------|---------|----------|-----|
| 1 – BR | \$751   | \$14.44 | \$30,040 | 80  |
| 2 – BR | \$987   | \$18.98 | \$39,480 | 105 |
| 3 – BR | \$1,391 | \$26.75 | \$55,640 | 148 |
| 4 – BR | \$1,675 | \$32.21 | \$67,000 | 178 |

As the data demonstrates, all types of rental units, from zero-bedroom rentals through four-bedroom rentals, require the renter to work more than 40 hours per week to earn the annual income needed to afford rent at Idaho minimum wage rates. Table 3 shows the CDBG Program Year 2024 (PY2024) Income levels for low and moderate-income residents. The table has been highlighted to show which income levels would be able to afford (green) or would not be able to afford (red) Fair Market Rent based on household size and using approximation of the HUD Occupancy Standards (Keating Memorandum) per unit size and household size (ie – a 4-person household would need at least a 2 BR unit)<sup>3</sup>.

**Table 3: Program Year 2023 CDBG Income Limits**

|                     | Household Size |          |          |          |          |          |          |          |
|---------------------|----------------|----------|----------|----------|----------|----------|----------|----------|
|                     | 1              | 2        | 3        | 4        | 5        | 6        | 7        | 8        |
| Extremely Low (30%) | \$17,850       | \$20,400 | \$22,950 | \$25,450 | \$27,500 | \$29,550 | \$31,600 | \$33,600 |
| Very Low (50%)      | \$29,750       | \$33,950 | \$38,200 | \$42,450 | \$45,850 | \$49,250 | \$52,650 | \$56,050 |
| Low Income (80%)    | \$47,550       | \$54,300 | \$61,150 | \$67,900 | \$73,350 | \$78,800 | \$84,200 | \$89,650 |

As Table 3 demonstrates, the most at-risk populations, those extremely low and low income making 50% or less than AMI, are unable to afford fair market rents. Further, larger household sizes are more likely to experience overcrowding due to the availability of units.

Based on recent searches using local rental listing sites, the following shows available rentals and the average monthly rent for each:

**Table 4: Available Rental and Average Monthly Rent in Pocatello, ID (Zillow, 2024)**

| # BR | Total Available Per Zillow (9/13/2024) | Average Monthly Rent | Minimum Monthly Rent | Max Rent | Range  |
|------|----------------------------------------|----------------------|----------------------|----------|--------|
| 5    | 2                                      | \$1,599.67           | \$2399               | \$2400   | \$1    |
| 4    | 11                                     | \$1,538.54           | \$895                | \$2499   | \$1604 |
| 3    | 46                                     | \$1,061.98           | \$925                | \$2499   | \$1524 |
| 2    | 58                                     | \$1,008.16           | \$650                | \$3300   | \$2650 |

<sup>3</sup> [https://www.hud.gov/sites/documents/DOC\\_7780.PDF](https://www.hud.gov/sites/documents/DOC_7780.PDF)

|        |    |          |       |         |        |
|--------|----|----------|-------|---------|--------|
|        |    |          |       |         |        |
| 1      | 13 | \$839.94 | \$265 | \$5,000 | \$4735 |
| Studio | 11 | \$970.57 | \$475 | \$725   | \$300  |

This data snapshot can be further analyzed to determine if there are available units at the fair market rents delineated by Out of Reach. For example, a Pocatellan looking for a 3 BR apartment would have a Zillow search reveal 46 available units. Of those 46 units, 27 would be available at Fair Market Rent of \$1,391. For 2 BR apartments, of the available 58 rentals that appear in a search, only 21 or 36% of available units are at or below Fair Market Rent of \$987. Seven of the 13 1-bedroom apartments are at or below FMR and nine of the six studios are at FMR. When considering other factors for unit costs and tenant needs such as rental application fees, security deposit, acceptance of pets, proximity to public transit, and utility costs, the available, affordable units become more restricted.

When looking at Social Security Income, the maximum monthly SSI payment for 2023 is \$914 for an individual and \$1,371 for a couple which means a monthly rent of \$274 or \$411.30 for individuals or couples would be affordable to SSI recipients. None of the fair market rents above would be attainable for an SSI recipient unless they had a supplemental income. Per the U.S. Census Bureau, Quick Facts (2018-2022) 11.6% of the population under age 65 in Pocatello have a disability, compared to a national average of 8.9%<sup>4</sup>. Further, 14.4% of Pocatello population is considered in poverty, as compared to the national average of 11.1%<sup>5</sup>. When comparing the poverty rate to that of Idaho, Pocatello is above the statewide rate of 10.1%.

### **Affordable Housing not keeping pace**

The affordable housing crisis is not unique to Idaho and is plaguing the nation. According to the Federal Reserve Bank of St. Louis, the average sales price for houses sold in the United States in quarter 4 of 2015 was \$366,700<sup>6</sup>. In quarter 4 of 2022, this increased to \$552,600, which represents over 50% increase in price. For Idaho, the Housing Price Index (HPI) increased from 318.63 in Q4 of 2015 to 742.31 in Q4 of 2022<sup>7</sup>. HPI is an indicator of single-family home pricing using transactions including conventional and conforming mortgages on single-family homes. The HPI does not include other, non-conventional lending, such as Veteran's administration (VA) loans or FHA loans. When reviewing VA loans data, the average loan amount for ID VA loans in FY2015 was \$200,327 with a total of 5,164 loans issued, and for FY2023, the average was \$404,589 with a total of 2,866 loans issued. This represents an over 100% increase in the average loan price and a decrease of nearly 50% in the number of loans issued, demonstrating the exceptional cost and lack of supply of housing.<sup>8</sup>

### **Insufficient Affordable housing**

<sup>4</sup> <https://www.census.gov/quickfacts/fact/table/pocatellocityidaho,US/PST045222>

<sup>5</sup> Poverty thresholds for <https://www.census.gov/data/tables/time-series/demo/income-poverty/historical-poverty-thresholds.html>

<sup>6</sup> <https://fred.stlouisfed.org/series/ASPUS#>

<sup>7</sup> <https://fred.stlouisfed.org/series/IDSTHPI>

<sup>8</sup> [https://www.benefits.va.gov/HOMELoans/lender\\_state\\_volume.asp](https://www.benefits.va.gov/HOMELoans/lender_state_volume.asp)

The National Low-Income Housing Coalition published its report, *The Gap*, to address the shortage of affordable rental homes. Based on NLIHC data, no state has an adequate supply of affordable rental housing for low income renters. When looking at Idaho, specifically, for every 100 extremely low-income renter households, only 42 affordable rentals are available<sup>9</sup>. Based on *The Gap* report, 74% of extremely low-income renters have a housing cost burden (greater than 30% of their income goes toward housing) which means the majority, or nearly 3/4, of the state's lowest income earners are most burdened by housing costs.

When looking at population growth, Idaho has consistently been experiencing massive growth in recent years. Based on the world population review data, Idaho is the second fastest growing state in the nation with a 22.52% growth since 2010<sup>10</sup>. Idaho's growth rate is second to Utah, whose growth is primarily due to the state's high birth rate. Idaho's growth rate average 1.43% per year. Despite the statewide growth data, Pocatello decennial census results do not reflect massive growth trends. However, the overall growth of the state has trickle down effects on the community and will impact available resources, infrastructure, and housing. Comparative Housing Characteristics provided by the US Census Bureau show little to no change in total housing units for Pocatello between 2012-2016 estimates and 2017-2021 ACS 5-year estimates. The change in total housing units went from 22,450 to 23,150, an approximate 3% increase. Vacant housing decreased in this time period from 9.0% to 8.1% and the rental vacancy rate essentially remains the same from 7.5% to 7.7%<sup>11</sup>.

### **Widespread housing cost burden or substandard housing**

As noted above and based on the CHAS data, the housing that is affordable is insufficient. Further, the housing that is affordable is substandard. Households that can have worst-case needs are households that are renters, have very low incomes—incomes of no more than 50 percent of the area median income (adjusted for family size) - and do not receive housing assistance. When looking at 2021 ACS 5-Year estimate data, of households surveyed, 25% are living in a household with SSI, cash public assistance income, or food stamps/SNAP in the past 12 months<sup>12</sup>. Coupled with the noted high cost of housing and housing cost burden, this data indicates that a large percentage of Pocatello residents are in need of income assistance and would benefit from having available, affordable housing.

Further, homeowners are living in substandard housing, with high housing cost burdens, and are experiencing overcrowding. When reviewing CEJST data, Census Tract 16005001603 with a population of 2,938 is in the 73<sup>rd</sup> percentile for Low Income and 97<sup>th</sup> percentile for lack of indoor plumbing. Census tract 16005000800 is in the 65<sup>th</sup> percentile for low income and 98<sup>th</sup> percentile for lack of indoor plumbing. Census tract 160050009000 is in the 91<sup>st</sup> percentile for lead paint and 76<sup>th</sup> percentile for low income. Census tract 16005001601 is in the 91<sup>st</sup> percentile for housing cost, 95<sup>th</sup> percentile for lead paint, and 80<sup>th</sup> percentile for low income. This indicates the following:

- Housing cost - Share of households making less than 80% of the area median family income and spending more than 30% of income on housing
- Lack of indoor plumbing - Share of homes without indoor kitchens or plumbing

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<sup>9</sup> <https://nlihc.org/gap>

<sup>10</sup> <https://worldpopulationreview.com/state-rankings/fastest-growing-states>

<sup>11</sup> <https://data.census.gov/table/ACSCP5Y2021.CP04?q=Pocatello&t=Housing:Housing+Units>

<sup>12</sup> <https://data.census.gov/table/ACSDT5Y2021.B09010?q=housing+in+Pocatello+city,+Idaho>

- Lead paint - Share of homes that are likely to have lead paint
- Low income - People in households where income is less than or equal to twice the federal poverty level, not including students enrolled in higher education

As the market data, CHAS data, and CEJST tool indicate, those neighborhoods in Pocatello (the Census tracts noted above) that can support the City's low- and moderate-income populations are also the areas of the City with the worst housing conditions: lack of indoor plumbing and presence of lead-based paint. Further, Pocatello has an aging housing stock. Based on 2022 ACS data<sup>13</sup>, there are an estimated 21,277 housing units. Of those, 14,492 or over 68% were built earlier than 1979. Homes built before 1959 represent 38% of the total housing stock. Because the majority of the housing stock was built before 1979, it can be presumed that the infrastructure is aging and other hazards, such as lead-based paint or asbestos, are likely present in the homes. Over a fifth, or 22.7%, of total households have children under age 6, and they are most negatively impacted during these critical growth and development years. The age of the housing stock and condition necessitates programs and strategies to develop additional, more affordable housing.

According to Realtor.com<sup>14</sup>, the median listing home price in Pocatello was \$392,000. As compared to median household income of \$56,115<sup>15</sup>, this is an approximate median sale price to income ratio of 7 to 1. This means the home listing price is over 7 times the median income.

Overall the quality and availability of housing in the City necessitates removal of barriers to creating more affordable housing. The impacts of substandard housing and high housing cost burden disproportionately affect those most in need (low- and extremely low-income residents). There is demonstrable need in Pocatello when reviewing data regarding the cost of housing, rentals, income and poverty levels, social assistance received, and condition of the existing housing stock.

### **iii. What key barriers still exist and need to be addressed to produce and preserve more affordable housing?**

Many key barriers exist to producing and preserving affordable housing. The major barrier is the market. At this time, the cost of construction and availability of land is limited, resulting in high costs and a need to build larger homes or multi-unit dwellings. In addition, the real estate market has resulted in a highly competitive buyers' market due to lack of housing stock. This also extends to the rental market. There is a lack of availability of financing and subsidies for affordable housing as well. In a competitive housing market with a small available housing stock, buyers must act quickly and have financing readily available upon placing an offer on a home. Down payments can range from 3.0% to as high as 20% in today's market; however, for a Federal housing Administration (FHA) mortgage, the minimum down payment is 3.5%. In August of 2024, the median price for a home sold in Pocatello was \$365,000, which would equate to a minimum down payment of \$12,775. For those low- and moderate-income residents, this ranges from 71.5% to 14% of annual income depending on household size. Table 5 details the percent of annual income a 3.5% down payment would be for low-income (80% AMI) residents:

<sup>13</sup> <https://data.census.gov/table/ACSSE2022.K202505?q=housing+in+Pocatello+city,+Idaho>

<sup>14</sup> [https://www.realtor.com/realestateandhomes-search/Pocatello\\_ID/overview](https://www.realtor.com/realestateandhomes-search/Pocatello_ID/overview)

<sup>15</sup> [https://data.census.gov/profile/Pocatello\\_city,\\_Idaho?g=160XX00US1664090#income-and-poverty](https://data.census.gov/profile/Pocatello_city,_Idaho?g=160XX00US1664090#income-and-poverty)

**Table 5: Average down payment as percent of income, by household size**

|                                                  | Household Size |          |          |          |          |          |          |          |
|--------------------------------------------------|----------------|----------|----------|----------|----------|----------|----------|----------|
|                                                  | 1              | 2        | 3        | 4        | 5        | 6        | 7        | 8        |
| Low Income (80%)                                 | \$47,550       | \$54,300 | \$61,150 | \$67,900 | \$73,350 | \$78,800 | \$84,200 | \$89,650 |
| Average Down Payment for FHA Loan as % of Income | 27%            | 24%      | 21%      | 19%      | 17%      | 16%      | 15%      | 14%      |

With PRO Housing, the City would be able to remove the barrier of having available cash on hand to purchase a home by providing down payment assistance to qualifying purchasers. This eliminates a barrier to homeownership by not only allowing low-and moderate-income residents to enter the housing market but also by reducing their monthly mortgage payment by providing a substantial down payment.

Based on recent data from the HACP, there is a lengthy wait list for Housing Choice Vouchers in Pocatello. In addition, the HACP is unable to fill existing vouchers due to lack of units available to accept a voucher. At this time, the HACP is only using about 60% of available vouchers. This means that those approved for vouchers are still waiting for available units in addition to the applicants on the waitlists. Further, local developers that attempt to construct affordable housing are unable to finance projects without additional subsidies. NeighborWorks Pocatello was awarded a LIHTC in 2021 after two previous attempts to apply for the credit. Habitat for Humanity used CDBG funds to construct a single-family residence in 2017 that was to be completed in a year but experienced delays due to increasing projects costs from COVID and other market factors. NWP received a CDBG grant in PY2022 for acquisition that had to be reprogrammed due to lack of available or affordable lots in Pocatello.

In addition to market factors, the City is in need of updating its zoning code in order to stream line the approval process. Through the adoption of form-based code, the zoning code will be easier to understand, meet requirements, review, and approve. This will expedite the process and make it more predictable and easier for developers to implement. Further, the City can look at Smart Growth principles for zoning reform and implement that through the comprehensive zoning code analysis that will be conducted through the Housing Study included in the PRO Housing program. While changes to the code still are needed, the City has been diligent in updating the code incrementally to remove barriers.

Since 2020, the City has approved 6 Ordinances to amend the Title 17 Zoning Code. These amendments address zoning and land use controls in an attempt to make the process for approving housing projects more streamlined and efficient. Further, the amendments result in less restrictive zoning to allow for mixed-use, denser development in more zoning districts.

While the City has made great strides in updating its zoning code to address policy barriers to affordable housing, work does still need to be done. The PRO Housing proposal would allow the city to look into more proactive approaches to encouraging housing development such as incentives or standard plans. The proposed Housing Study would be able to determine if there are other prohibitive policies in place that can be revised, especially during a robust public outreach process with local developers and residents. Further, the Housing Study would incorporate a specific zoning code analysis and focus on fair housing practices and principles that would directly address affirmatively furthering fair housing and affordable housing.

Finally, while zoning code and other internal codes and regulations can be reviewed, updated, and adjusted, Pocatello does face unique barriers to development due to its geographic layout. Pocatello is in a valley, constrained by the topography which inhibits some development into public lands and steep, hillside terrain. Further, the City is bisected, by the Portneuf River and the Union Pacific Railroad which essentially run north to south through the City. The PRO Housing proposal would allow for adoption of creative, individualized solutions to development that incorporate these geographic challenges. In particular, the neighborhood specific plans would look at individual area needs and capacity for housing development such as infill, multifamily, and more, while considering the geographic constraints of that neighborhood (ie – slopes and grades, proximity to the river, available land, etc). Overall, the PRO Housing Program would take a comprehensive look with a lens toward affordable housing creation and preservation to address the remaining barriers to housing in the city.

**Exhibit D Soundness of Approach**

DRAFT

**i. What is your vision?**

The City proposes a multi-pronged approach to ensure the preservation of existing affordable housing while also increasing production of affordable housing, particularly in the City's core neighborhoods. The City's PRO Housing grant proposal will implement the multipronged approach through: plans, projects, and activities. All of the proposed activities are eligible under the CDBG program and therefore meet grant requirement eligibility. Specifically, the projects comply with the benefiting low- and moderate-income persons National Objective.

Plans

In 2023, the Pocatello City Council adopted the City's Comprehensive Plan 2040: Our Valley | Our Vision. The Comprehensive Plan established seven vision elements that would guide the next 20 years of City projects to ensure the future of Pocatello reflected the community's needs. As part of the Authentic and Affordable Housing vision element, the goals included several plan updates in order to realize the vision of neighborhoods that are affordable, complete, unique and reflective of the City's history. The PRO Housing grant proposal will provide funding to complete these plans including:

- **Housing Study** – The Housing Study will address all requirements for HUD, CDBG, and HOME grants; perform a housing needs assessment; conduct community engagement and outreach; policy review; set public policy goals and objectives; and outline implementation strategies for achieving the desired goals and objectives. The goals are to: reduce the regulatory cost of housing; attract and retain middle-income families; expand resources available for housing programs and services; preserve the existing housing stock; address the needs of low-income and special needs populations such as elderly, large families, at-risk youth, homeless, single parent households, persons released from correctional facilities, etc.; and undertake housing efforts to support economic development.
- **Title 17 Zoning Code Rewrite** – The Title 17 Zoning Code rewrite will allow the city to develop form-based code standards to guide development within each neighborhood. This will align with the proposals and recommendations in the Comprehensive Plan and help facilitate increased housing production through removal of regulatory burdens and barriers inherent in the permitting and approval processes.
- **Neighborhood Plans** – The City has six core neighborhoods represented by local neighborhood associations. As part of the planning efforts, the City will complete unique neighborhood plans with the goals of addressing specific needs and concerns for each neighborhood. The goals will be to preserve the existing housing stock, expand resources available in the neighborhoods, preserve the neighborhood's character and history, remove barriers to homeownership in the neighborhood, address historical segregation in the neighborhoods, and ensure they accessible and affordable for current and future residents.

Projects

The City will undertake several projects as part of its PRO Housing grant proposal. These projects will be longer term efforts derived from the plans and allow for implementation of plan strategies in order to encourage affordable housing production and preserve existing affordable housing. Specific projects that will be implemented include:



- Establish Tax Increment Finance Districts – The City Comprehensive Plan and Downtown Development Plan recommend the establishment of Tax Increment Finance (TIF) districts. City Planning Staff will work with local businesses in target neighborhoods to develop TIF districts as appropriate. This will foster economic development and provide opportunities for residents living in and around these areas. It will not only provide potential improvement for local businesses but ensure thriving, growing communities for those neighborhoods. Many of the City's core neighborhoods are home to its low and moderate-income residents who rely on access to amenities and resources in their neighborhoods. These districts can ensure preservation of existing businesses, encourage streetscape improvements, cohesive neighborhoods character, and ultimately create a sense of place. Additional benefits may include increased property values as well.
- Specific Projects from the Plans – The PRO Housing Proposal includes funding to complete the specific projects that will be identified in the Housing Study and Neighborhood Plans. At this time, the specific projects are unknown but could include: adaptive reuse of historic or underutilized properties; establishing a business district or rezoning for adaptive reuse; establishing a land trust or housing trust; partnering with a local nonprofit or the Housing Authority for new development or redevelopment of public housing. These strategies will be established by the plans and the PRO Housing proposal anticipates acting on several strategies over the period of performance with this funding.

#### Actions

While the City develops plans and implements strategies from those plans in the form of projects, affordable housing will also be preserved and produced using ongoing activities. Specifically, the City will use PRO Housing grant funding to bolster its already successful RENEWAL program. The PRO Housing grant will allow the Neighborhood and Community Services Division to implement many facets of the RENEWAL program that have been unfunded or underfunded due to CDBG budget reductions over the last several program years. The PRO Housing grant will provide for the following RENEWAL program activities:

- Property Rehabilitation Grant Program - The RENEWAL grant program provides grants up to \$5,000 to qualifying low- and moderate-income homeowners for qualifying repairs and property rehabilitation work. Examples of projects include hot water heater replacements, roof replacements, mold remediation, window replacement, and other activities that may qualify upon a housing quality standard assessment. Grants are available to single family property owners including those living in mobile homes. The program has been especially utilized by mobile homeowners, as conventional financing is not an option for these properties. Through the PRO Housing grant, the City would expand the grant program by providing either more grants or increased grants up to \$7,500 or \$10,000 for needed repairs.
- Property Rehabilitation Loan Program – In addition to the RENEWAL grant program, the City offers 0% interest, partially or fully deferred loans to single family homeowners in need of rehabilitation work that exceeds the grant limit. These are often larger or more complex home repairs such as exterior sewer line replacement, full roof replacement, foundation work, etc. Loans are offered at 0% interest and depending on credit parameters, may be partially deferred or fully deferred loans due upon sale,

- refinancing, or transfer of property. The PRO Housing grant would allow for additional loans to be authorized in the program year and expand to more qualifying homeowners as well as ensure 0% interest or offer full deferrals to homeowners.
- Acquisition of Properties for Affordable Housing Development – Through the RENEWAL program's acquisition program, the City has been able to partner with local non-profit housing developers to create new affordable housing for low- and moderate-income residents. The City would continue to work with local partners to identify properties available for infill housing development. The City would finance the acquisition and, through a property development agreement, transfer the property to the housing partner to construct the infill development to be sold to a qualifying low- and moderate-income resident. CDBG funding has been used for this in the past, but with the increased cost of property, it has been challenging to obtain lots with the limited entitlement funding. In addition, the PRO Housing grant would allow for the purchase of a building that could be redeveloped on large-scale to provide multi-family or rental housing for low- and moderate-income residents. The PRO Housing grant would provide necessary funding for the acquisition program.
  - Acquisition and Demolition for Affordable Housing – Similar to acquisition and infill, the acquisition and demolition program would allow the City to acquire lots with condemned or otherwise unsalvageable properties for demolition. The PRO Housing grant would finance the acquisition and demolition work and then, through a property development agreement, a local nonprofit partner would construct affordable housing on the lot.
  - Down Payment Assistance – The RENEWAL down payment assistance program historically has paired with the acquisition program. Through the PRO Housing grant, the City will be able to provide down payment assistance to any approved acquisition clients. In addition, the City will be able to operate the down payment assistance program independent of the acquisition program. The City will be able to provide assistance up to \$15,000 (not to exceed 50% of the required down payment) for qualifying low- and moderate-income home purchasers.

These programs have been proven to be successful, particularly in achieving CDBG Consolidated Plan goals. The long-tenure of the RENEWAL program and outcomes as reported to HUD have shown that the programs are successful. Many lessons have been learned about how to implement the programs and ensuring proper outreach and marketing to the target audience will help the programs thrive. The additional funding from the PRO Housing grant will ensure more clients can be assisted and provide a broader impact citywide as well.

Through a combination of planning efforts, programs, and actions, the City's PRO Housing proposal will address current and future affordable housing needs. Plans and programs will ensure the demand for affordable housing needs are met and in line with the strategic priorities developed in the City's Comprehensive, Downtown, Historic Preservation, and Consolidated Plans. Meanwhile, the programs will develop strategies to address those priorities. To respond to current needs for preserving affordable housing, the PRO Housing program will heighten and enhance the RENEWAL program to address acute needs of the target population.

Overall the approach aligns with existing planning initiatives, services, and community assets while bolstering proven programs and enhancing them to account for future needs. The following chart shows the current plans and initiatives, goals outlined in those plans, and how the PRO Housing approach will address those items or contribute to those goals:

**Table 6**

| Plan                                                | Goal or Initiative                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | PRO Housing Strategy            |
|-----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| Comprehensive Plan 2040:<br>Our Valley   Our Vision | <p>Authentic &amp; Affordable Neighborhoods:</p> <ol style="list-style-type: none"> <li>1. Create Complete Neighborhoods by implementing development criteria informed by unique neighborhood plans.</li> <li>2. Conduct intentional, equitable, and measurable neighborhood planning.</li> <li>3. Create a Housing Plan that will provide guidance on housing needs for each neighborhood.</li> <li>4. Assist those who are unhoused or otherwise in need to help prevent their involuntary displacement.</li> <li>5. Develop form-based code standards to guide new development within each neighborhood.</li> <li>6. Preserve the authenticity of Pocatello's neighborhoods and celebrate our history, architecture, and culture.</li> </ol> | Plans<br>Projects<br>Activities |
| Downtown Development Plan                           | <p>Assess the possibility of implementing a Tax Increment-Financing (TIF) District within the Downtown to help fund development activities</p> <p>Implement incentive programs that promote &amp; encourage upper story housing in historic buildings.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Plans<br>Projects               |

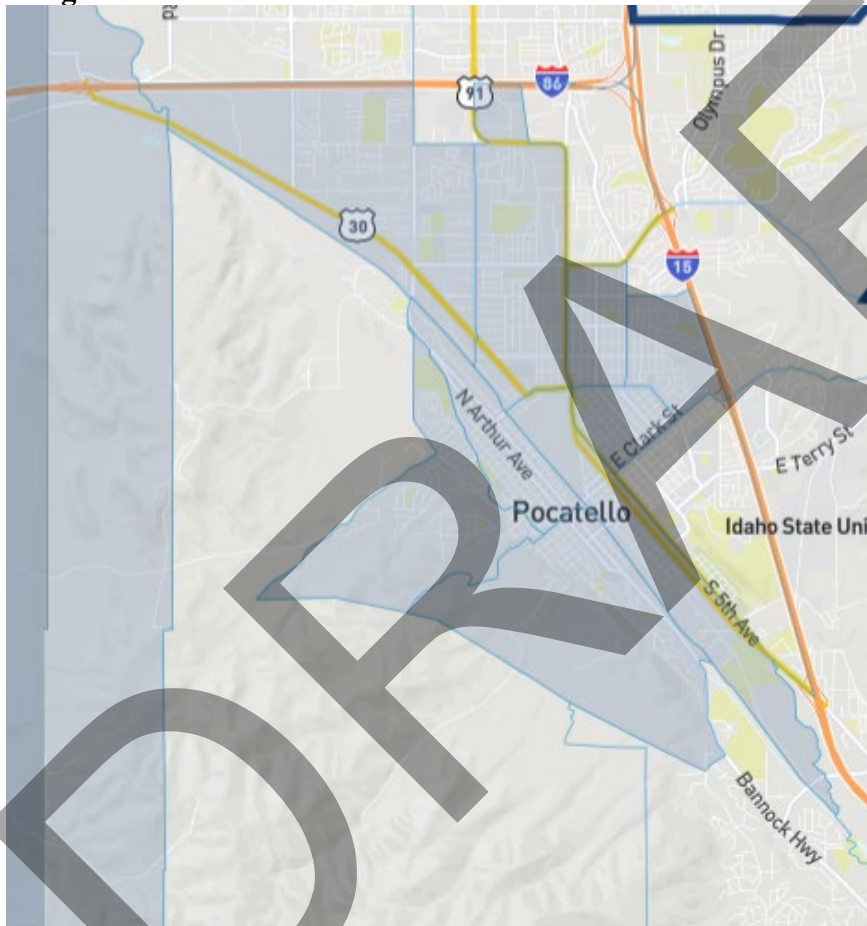
|                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                |
|-------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|
|                               | <p>Implement standards that encourage the development of live-work units.</p> <p>Collaborate with Idaho State University Facilities personnel to explore the feasibility of acquiring property and constructing a new student living center and student housing</p> <p>Prioritize the re-purposing of existing historic buildings for residential, commercial and mixed uses.</p> <p>Promote the development of surface parking lots with multi-story structures that are sensitive to the historic assets of the district.</p> <p>Encourage high intensity urban development.</p> |                                                |
| PY2022-2026 Consolidated Plan | <p>Provide Decent Housing</p> <p>Create a Suitable Living Environment</p> <p>Expand Opportunities for LMI Persons</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <p>Plans</p> <p>Projects</p> <p>Activities</p> |

**ii. What is your geographic scope?**

The proposal will focus on the City's core neighborhoods and census blocks identified as historically disadvantaged communities. This will allow the City to focus on underserved communities and high opportunity areas.

According to the Climate and Economic Justice Screening Tool (CEJST)<sup>1</sup>, the following census tracts are considered historically disadvantaged areas: 160005001500, 16005001300, 16005001400, 16005001000, 16005000900, 16005000800, 16005001601, 16005001603, and 16005001602. All of these tracts meet a qualifying threshold for low income percentiles above the 65<sup>th</sup> percentile. In other words, the tracts have people in households where income is less than or equal to twice the federal poverty level, not including students enrolled in higher ed. Additional burdens include: presence of lead-based paint, low median income, poverty, high school education, lack of indoor plumbing, expected population loss rate, projected wildfire risk, projected flood risk, unemployment, low life expectancy, presence of formerly used defense sites, and proximity to superfund sites.

**Image 1**



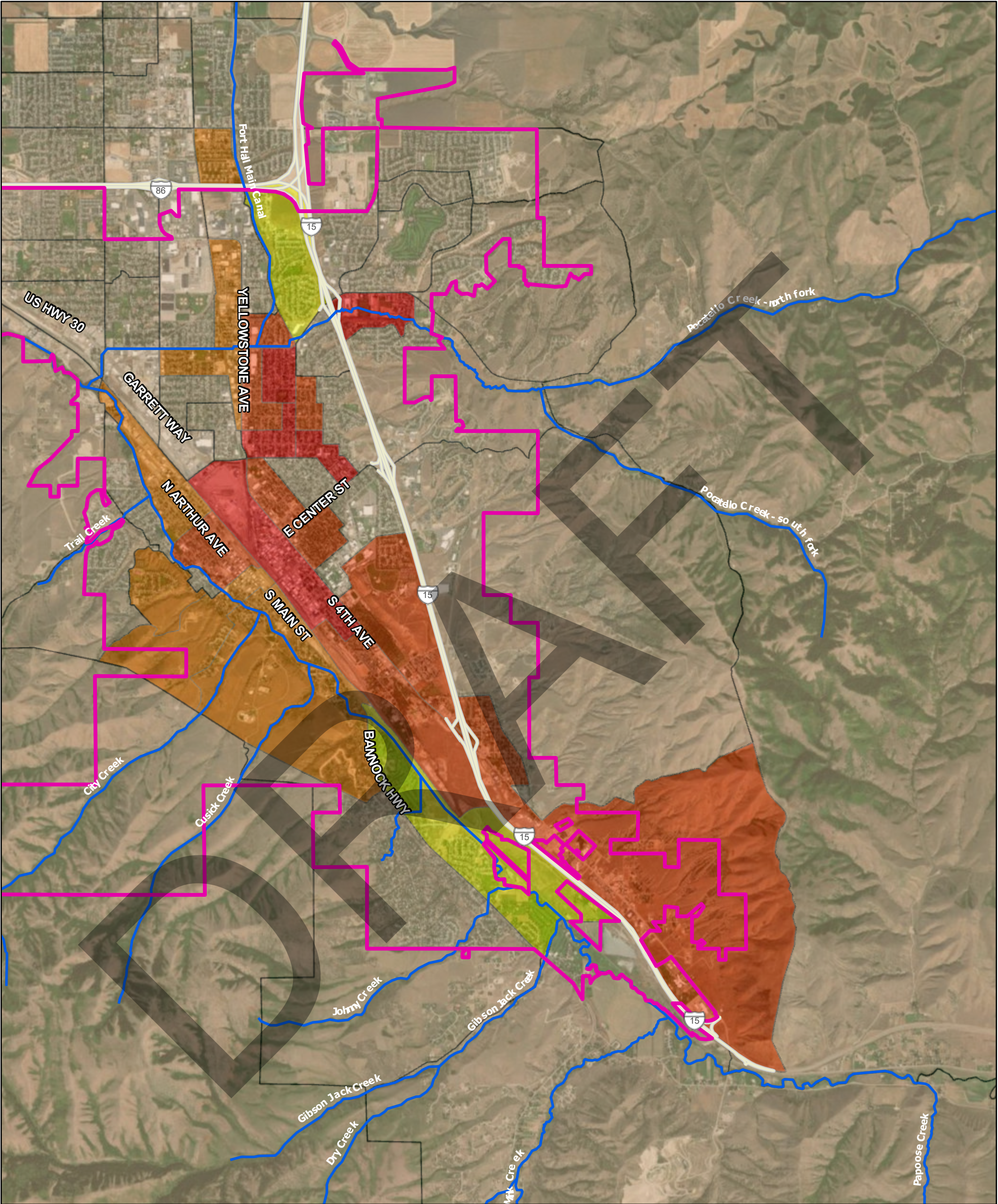
In addition to the CEJST tool, the HUD Low- and Moderate-Income Survey Data Sets (LMISD) summary data for 2011-2015 shows that the core neighborhoods identified through the CEJST tool also qualify for LMA designation<sup>2</sup>. The following map shows those LMA areas in Pocatello that would qualify for area-benefit activities:

<sup>1</sup> <https://screeningtool.geoplatform.gov/en/#12.64/42.89615/-112.48461>

<sup>2</sup> <https://www.hudexchange.info/programs/cdbg/cdbg-low-moderate-income-data/>



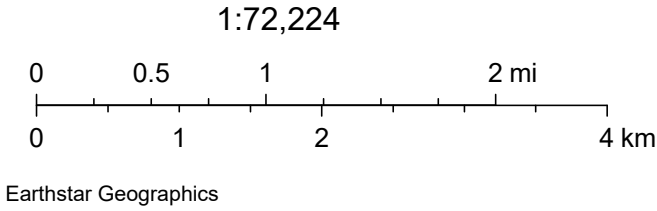
# CDBG Map



7/11/2024, 7:47:03 AM

LMISD2023\_ExportFeatures

- 0.000000 - 50.000000
- 50.000001 - 51.000000
- 51.000001 - 60.000000
- 60.000001 - 70.000000
- 70.000001 - 76.300000





By targeting these areas, the City can ensure it is reaching the most vulnerable, at-risk populations in terms of housing need. In addition, it can fulfil objectives of the Biden Administrations Justice40 initiatives as well as the goals of the CDBG program, by ensuring HUD funding is used in eligible LMA benefit areas.

Key stakeholders for the proposal include Pocatello residents as a whole, with a particular focus on the target population. The target population primarily includes low- and moderate-income residents or qualifying CDBG clients in the core neighborhoods. Qualifying CDBG clients are those that meet the Low and Moderate-Income Clientele (LMC) criteria or other CDBG Low-and Moderate-Income National Objective criteria. Specifically, this includes those earning 80% or less than Area Median Income, presumed LMI clientele, the nature and location of an activity that serves primarily LMI persons, removal of architectural barriers to mobility of elderly or disabled persons, LMI housing including acquisition of property to be used for permanent housing, rehabilitation of permanent housing, and homeownership assistance. The City works with local partner organizations to identify target populations and potential clients. This includes the City's Housing Authority and their clients receiving housing choice voucher assistance, the City's emergency shelters including the homeless shelter, domestic violence shelter, and youth shelter; food service program clients such as those who patron local food banks; local healthcare clients including the free clinic and Southeast Idaho Public Health; and other local non-profit partners who offers services to target clientele for public service activities.

Key City Departments and Staff that will be engaged include: Planning, Engineering, Public Works, and Building. These staff will be vital contributors to the plans and code updates that will eliminate barriers to affordable housing production and preservation. In addition, these Staff assist with internal programs, such the RENEWAL home rehab program, to ensure scopes of work are accurate, specifications meet City requirements, permitting processes are followed, the work passes inspection, and all City requirements are followed. Further, the Pocatello Regional Transit (PRT) Authority will be involved to ensure efforts to improve transportation and accessibility align with program goals.

Other quasi-governmental agencies to be included are the Bannock Transportation Planning Organization and Housing Authority. BTPO conducts public outreach and projects transportation needs or improvements based on growth. It will be vital to ensure transportation planning is coordinated with housing plans to ensure things such as transit-oriented development, alternative transportation, access, and resources are available. Housing Alliance and Community Partnership (HACP), the City's Housing Authority, is a key stakeholder for reaching the target populations and implementing the programming that will help ensure housing stability and affordable housing for clients.

Finally, local non-profit partners will be major contributors to the Pro Housing program. In addition to those implementing CDBG programming noted above, local community groups such as the local Neighborhood Associations, the Pocatello Chapter of the NAACP, and Historic Downtown Pocatello will be key in ensuring appropriate community engagement and connection with the neighborhoods. Other entities such as Idaho State University will be critical to implementing the planning and strategies in the neighborhoods, especially those located near the University, and coordinating housing efforts and goals. ISU is currently developing a Master Plan

which will help inform student housing needs, growth expectations, workforce development opportunities, and more.

The City's PRO Housing proposal directly reflects outreach conducted by the City for the development of several local plans and initiatives. As noted, the proposal is derived from many of the goals outlined in the City's recently adopted Comprehensive Plan, for which myriad outreach and engagement was conducted.

As an entitlement community, Pocatello is subject to the requirements of 24 CFR Part 91 and as such completed outreach in accordance with the regulation for the development and adoption of its most recent CDBG five-year Consolidated Plan (Con Plan) for program years 2022-2026. The Con Plan provides the recommendations for addressing Part 91 goals of developing viable urban communities by providing decent housing and a suitable living environment and expanding economic opportunities principally for low- and moderate-income persons. In order to develop this Plan, the City used a number of outreach and engagement techniques, including those detailed in the City's Citizen Participation Plan to ensure its plan not only met the requirements in 24 CFR Part 91 (including Subpart B), but also so that it had an informed, comprehensive plan reflective of actual needs.

As part of the Con Plan outreach, the City encouraged and sought broad participation but especially encouraged participation from low- and moderate-income persons, residents of slum and blighted areas, residents of predominantly low- and moderate-income neighborhoods, minorities, non-English speaking persons, persons with disabilities, public housing residents, local and regional institutions, businesses, developers, nonprofit organizations, philanthropic organizations, and community or faith-based organizations. Outreach included:

- Stakeholder Listening Sessions: Pocatello held two Stakeholder Listening Session on August 16, 2021 and August 18, 2021 to help receive input on community needs. Meetings had robust discussion about challenges faced by residents, fair housing practices, and the need for additional resources. All comments and recommendations were noted and integrated into the decision-making process for determining goals and projects for the Consolidated Plan.
- CDBG Advisory Committee Meetings: Pocatello has an active and engaged CDBG Advisory Committee that meets regularly and provides programmatic oversight. Staff met with the CDBG Advisory Committee (Committee) throughout the Consolidated Plan process. All meetings are open to public and accept public comment.
  - August 17, 2021 - City Staff and the consultants working on the Consolidated Plan presented an overview of the planning process to the Committee.
  - September 21, 2021 - Staff provided an update on the Consolidated Planning Process, reviewed PY22 Annual Action Plan technical assistance, preliminary data from the community survey and Needs Assessment, and preliminary goals/projects.
  - October 19, 2021 - Staff provided an update on Consolidated Planning Process, projects, and upcoming milestones.
  - November 20 2021 - Staff provided an update on the Public Comment Period, Council Hearing/Meeting.



- December 7, 2021 - The Committee decided on public service activity funding for FY22. Staff provided an updated on public comment period, City Council Work Session, Council Hearing, and plan submission to HUD.
- Community Needs Survey: The City widely distributed a Community Need Survey. It was made available to the community through the City website, social media, mayor newsletter, and posted in locations around the City in target areas (historic downtown, library, HACP, Life inc, NWP, PRT, etc).
- Community Outreach:
  - City staff had a table at the Back 2 School Giveaway event. Families were encouraged to fill-out the Community Survey and provide feedback on their individual households needs. Event planners planned for around 5,000 people, counting family members, and will probably give out supplies to between 1,500 and 1,700 kids.
  - City staff gathered Community Needs Survey at the Revive at 5 Summer Concert series which was held every Wednesday for 8 weeks during the summer.
- Community Group Presentations:
  - City staff gave a presentation to the Government and Community Relations on Consolidated Planning Process. The Government and Community Relations Committee Government is comprised of residents of the target neighborhoods that serve low-moderate income residents. Members of this committee also are LMI and program target populations.
  - City staff gave a presentation to Pocatello Rotary Club about the Consolidated Planning Process. Staff talked to Rotarians about their personal experiences within the community.

The Consolidated Plan was presented to the Pocatello City Council. All public meetings are held in a location convenient to residents, particularly those who are potential or actual beneficiaries. Meetings are held at times to provide maximum flexibility for an array of citizen schedules. Attention is given to ensure meeting times increase the probability of full citizen participation.

The City Council voted to adopt the Consolidated Plan at their February 3, 2022 meeting, after the public hearing. The Plan was accepted by HUD in July of 2022.

Additionally, the Consolidated Plan and Action Plan can be made available in Spanish upon request. All Public Hearings and Comment Periods are advertised in the local newspaper of general circulation.

### **iii. Who are your key stakeholders? How are you engaging them?**

Key stakeholders for the program will include those local agency partners the City works closely with on its annual CDBG entitlement program, the CDBG Advisory Committee, Planning & Zoning Commission, and other local boards/committees, local neighborhood associations, business community, target populations, including low-and-moderate income residents and those most affected by historical policies and development patterns that have resulted in segregation or displacement. The City will use a myriad of techniques to engage these stakeholders including: public outreach through media including the City's website, social media, press releases, local

newspapers, and other local media outlets; direct contact with target populations through events, open houses, public hearings, and attendance at community group meetings or events; and through existing advisory committee meetings as well as the creation of a key stakeholder steering committee that will represent the aforementioned groups and provide continued insight on the programs throughout the period of performance. The City will ensure its messaging and materials have broad outreach and are provided in an ADA-accessible format as well as multiple languages including Spanish. The City's public outreach and grant coordinator will spearhead these efforts.

iv. **How does your proposal align with requirements to affirmatively further fair housing?**

The proposal aims to achieve several of the goals outlined in the City's Analysis of Impediments to Fair Housing (AI), as adopted by its 2022-2026 Consolidated Plan. The AI aims to affirmatively further fair housing.

*Describe your plans to remove barriers to the development of affordable housing in well-resourced areas of opportunity. How will your proposal increase access for underserved groups to these areas? What is the racial composition of the persons or households who are expected to benefit from your proposed grant activities?*

The Pocatello PRO Housing proposal is driven by its three-prong approach: Plans, Projects, and Activities. While the approach can be implemented in a non-linear manner, it is anticipated that the planning portion of the PRO Housing activities will be completed first and largely inform any projects or changes to the proposed activities. Specifically, the Citywide Housing Study and individual neighborhood plans will help identify strategies to affirmatively further fair housing. The City's AI describes the jurisdiction's demographics using the 2020 census data:

**Table 7:**

| <b>Population</b>                                                                           | <b>City of Pocatello</b> | <b>Idaho</b> | <b>United States</b> |
|---------------------------------------------------------------------------------------------|--------------------------|--------------|----------------------|
| <i>Population estimates, July 1, 2019, (V2019)</i>                                          | 56,637                   | 1,787,065    | 328,239,523          |
| <i>Population estimates base, April 1, 2010, (V2019)</i>                                    | 54,236                   | 1,567,657    | 308,758,105          |
| <i>Population, percent change - April 1, 2010 (estimates base) to July 1, 2019, (V2019)</i> | 4.4%                     | 14.0%        | 6.3%                 |
| <i>Population, Census, April 1, 2020</i>                                                    | 56,320                   | 1,839,106    | 331,449,281          |
| <i>Population, Census, April 1, 2010</i>                                                    | 54,255                   | 1,567,582    | 308,745,538          |
| <b>Population Age and Sex</b>                                                               | <b>City of Pocatello</b> | <b>Idaho</b> | <b>United States</b> |
| <i>Persons under 5 years, percent</i>                                                       | 7.1%                     | 6.5%         | 6.0%                 |
| <i>Persons under 18 years, percent</i>                                                      | 24.5%                    | 25.1%        | 22.3%                |
| <i>Persons 65 years and over, percent</i>                                                   | 13.2%                    | 16.3%        | 16.5%                |
| <i>Female persons, percent</i>                                                              | 51.1%                    | 49.9%        | 50.8%                |
| <b>Population Race and Ethnicity</b>                                                        | <b>City of Pocatello</b> | <b>Idaho</b> | <b>United States</b> |
| <i>White alone, percent</i>                                                                 | 88.8%                    | 93.0%        | 76.3%                |
| <i>Black or African American alone, percent<a href="#">(a)</a></i>                          | 0.9%                     | 0.9%         | 13.4%                |
| <i>American Indian and Alaska Native alone, percent<a href="#">(a)</a></i>                  | 2.1%                     | 1.7%         | 1.3%                 |
| <i>Asian alone, percent<a href="#">(a)</a></i>                                              | 2.4%                     | 1.6%         | 5.9%                 |
| <i>Native Hawaiian and Other Pacific Islander alone, percent<a href="#">(a)</a></i>         | 0.2%                     | 0.2%         | 0.2%                 |
| <i>Two or More Races, percent</i>                                                           | 3.5%                     | 2.6%         | 2.8%                 |
| <i>Hispanic or Latino, percent<b><a href="#">(b)</a></b></i>                                | 9.0%                     | 12.8%        | 18.5%                |
| <i>White alone, not Hispanic or Latino, percent</i>                                         | 83.4%                    | 81.6%        | 60.1%                |

As is demonstrated above, the demographic makeup of Pocatello is predominantly homogenous, with 88.8% of residents identifying as White, alone for race and ethnicity. Special populations that reside in the jurisdiction are as follows:

**Table 8: Special Populations**

| <b>Special Populations</b>                                                                    | <b>City of Pocatello</b> | <b>Idaho</b> | <b>United States</b> |
|-----------------------------------------------------------------------------------------------|--------------------------|--------------|----------------------|
| <i>Veterans, 2015-2019</i>                                                                    | 3,331                    | 116,157      | 18,230,322           |
| <i>Foreign born persons, percent, 2015-2019</i>                                               | 4.20%                    | 6.00%        | 13.60%               |
| <i>Language other than English spoken at home, percent of persons age 5 years+, 2015-2019</i> | 7.20%                    | 10.90%       | 21.60%               |
| <i>With a disability, under age 65 years, percent, 2015-2019</i>                              | 13.20%                   | 9.60%        | 8.60%                |
| <i>Persons without health insurance, under age 65 years, percent</i>                          | 10.80%                   | 12.80%       | 10.20%               |

Notably, Pocatello has a higher rate of persons with a disability under age 65 than both Idaho and the US.

Finally, in regards to income, Pocatello's percent of persons in poverty is well above that of Idaho and the US as a whole.

**Table 9: Income Data**

| <b>Income Data</b>                                                      | <b>City of Pocatello</b> | <b>Idaho</b> | <b>United States</b> |
|-------------------------------------------------------------------------|--------------------------|--------------|----------------------|
| <i>Median household income (in 2019 dollars), 2015-2019</i>             | \$46,617                 | \$55,785     | \$62,843             |
| <i>Per capita income in past 12 months (in 2019 dollars), 2015-2019</i> | \$24,366                 | \$27,970     | \$34,103             |
| <i>Persons in poverty, percent</i>                                      | 18.50%                   | 11.20%       | 11.40%               |

With this, it is reasonable to assume that the underserved communities in Pocatello would be those that are not in the primary demographic makeup, those persons with a disability, and those persons in poverty. The Housing Study and individual neighborhood plans will inform what housing is available in the neighborhoods and Citywide as well as which areas are considered to be in well-resourced areas of opportunity. After identification of these areas, the plans will look at barriers to affordable housing. The City has some data and can rely on existing data to do a preliminary analysis of neighborhoods that may be under resourced. This primarily includes those in the core neighborhoods that are designated as Disadvantaged areas. However, the studies will determine if there are barriers to entry for other areas or if these areas have specific barriers to resources. The noted demographic populations are most likely to benefit from these studies and strategies.

*Describe your plans to remove barriers impeding the development of affordable housing that would promote desegregation. What policies or practices perpetuate segregation and how will your proposal address them?*

Because of Pocatello's demographic makeup, segregation is limited to primarily those areas that are concentrations of poverty or lower socioeconomic circumstance. Using the CEJST data tool and HUD low-moderate income area data mapper, census blocks with significant percentages of low-income populations are easy to identify. The following table details the demographic makeup of those census blocks identified as having people in households where income is less than or equal to twice the federal poverty level, above the 65<sup>th</sup> percentile.

**Table 10: Demographic Data for Low-Income Census Blocks**

| <b>Population Race and Ethnicity</b> | <b>White alone</b> | <b>Black or African American alone</b> | <b>American Indian and Alaska Native alone</b> | <b>Asian alone</b> | <b>Native Hawaiian and Other Pacific Islander alone</b> | <b>Other</b> | <b>Two or More races</b> | <b>Hispanic or Latino</b> |
|--------------------------------------|--------------------|----------------------------------------|------------------------------------------------|--------------------|---------------------------------------------------------|--------------|--------------------------|---------------------------|
| 16005000800                          | 78%                | 2%                                     | 0%                                             | 5%                 | 0%                                                      | 3%           | 2%                       | 11%                       |
| 16005000900                          | 83%                | 3%                                     | 1%                                             | 0%                 | 0%                                                      | 4%           | 0%                       | 11%                       |
| 16005001603                          | 87%                | 0%                                     | 0%                                             | 0%                 | 0%                                                      | 0%           | 2%                       | 10%                       |
| 16005001602                          | 80%                | 1%                                     | 6%                                             | 0%                 | 0%                                                      | 4%           | 1%                       | 8%                        |
| 16005001601                          | 85%                | 0%                                     | 6%                                             | 0%                 | 0%                                                      | 0%           | 5%                       | 2%                        |
| 16005001500                          | 83%                | 0%                                     | 0%                                             | 0%                 | 0%                                                      | 0%           | 5%                       | 12%                       |
| 16005001000                          | 82%                | 0%                                     | 6%                                             | 0%                 | 2%                                                      | 1%           | 2%                       | 12%                       |
| 16005001300                          | 75%                | 0%                                     | 0%                                             | 1%                 | 0%                                                      | 8%           | 5%                       | 16%                       |
| 16005001400                          | 80%                | 0%                                     | 5%                                             | 1%                 | 0%                                                      | 1%           | 4%                       | 7%                        |
|                                      |                    |                                        |                                                |                    |                                                         |              |                          |                           |

|                                                                                                                                         |  |  |  |  |  |  |  |
|-----------------------------------------------------------------------------------------------------------------------------------------|--|--|--|--|--|--|--|
| Census block has a Housing Indicator: Lack of indoor plumbing above 90 <sup>th</sup> percentile                                         |  |  |  |  |  |  |  |
| Census block has a Housing Indicator: Lead paint above 90 <sup>th</sup> percentile                                                      |  |  |  |  |  |  |  |
| Census block has two Housing Indictors: Housing cost above 90 <sup>th</sup> percentile and Lead paint above 90 <sup>th</sup> percentile |  |  |  |  |  |  |  |
|                                                                                                                                         |  |  |  |  |  |  |  |

As is noted in Table 10, three census blocks have CEJST Housing Indicators. While the census blocks may have other CEJST indicators for areas such as energy, health, or transportation, the Housing Indicators were of particular note due to the goals of the PRO Housing grant. Census blocks 16005000800, 165000900, 16005001603, 16005001500, 16005001000, and 165001300 have demographic makeups with substantial Hispanic or Latino populations (10% or greater). In addition, two of these blocks, 165000800 and 1600500900, have both low-income and housing indicators as identified equity and justice issues by the CEJST tool. The City will use this data to ensure planning efforts and housing specific plans are informed by the demographic makeup, look into historical reasons for population makeup, look into potential segregation by race, and investigate other related factors to address barriers impeding the development of affordable housing that would promote desegregation.

*How will you ensure that your proposal will not cause affordable housing to be further concentrated in low-opportunity areas or in areas that already have ample affordable housing? How will your proposal increase housing choice by expanding the neighborhoods in which residents who need affordable housing can live?*

The Housing Study and plan will provide insights and information as to the housing needs in the City. Through a comprehensive method of outreach and engagement as well as market studies, existing conditions analysis, and needs analysis, the Housing Study will address current and future housing needs for Pocatello. As part of the plan, the concentration of affordable housing as well as where it is located will be included in the analysis. The plan will recommend ways to expand housing choice and affirmatively further fair housing. In addition, the Projects and Actions proposed in the PRO Housing proposal will ensure that housing that is currently affordable and lived in by those in need of affordable housing (low- and moderate-income residents) will ensure they are not displaced. By preserving the existing affordable housing stock, it ensures that these homes are still livable for current residents and are available to other residents who may not be able to afford higher cost housing. It also prevents the housing from going to disrepair and potential redevelopment beyond the affordable levels.

*How does your approach address the unique housing needs of members of protected class groups, including persons with disabilities, families with children, and underserved communities of color?*

As is demonstrated by Pocatello demographics, the city's special populations primarily consist of persons with a disability and persons in poverty. Targeted outreach through local non-profits and specific to these groups will be conducted to ensure they are involved in the planning process of the PRO Housing proposal. In addition, all programs and activities will be proactively and specifically marketed to these groups. The predominant community of color in Pocatello is its Hispanic population. For those that are limited English proficient, materials will be provided in

multiple languages following the City's Language Assistance Plan (LAP) and translation services will be offered. The City will have vital documents translated in Spanish, per the LAP. The City will utilize resources and recommendations from the Intermountain Fair Housing Council to ensure it effectively reaches protected class groups, including those noted above.

*Does your plan address issues identified in your jurisdiction's most recent fair housing plan or plans?*

The objective of this grant proposal is to complete a Housing Study that will identify fair housing issues and develop strategies to address them. At this time, the City has an adopted AI that outlines 3 impediments that may have a direct impact on fair housing choice:

1. Lack of data on Fair Housing Violations
2. Lack of complaints out of sync with community feedback
3. Concern with rental market and fair housing violations

To address these three impediments, the Housing Study will work to collect and better analyze the fair housing violations and data on these potential violations so specific strategies and issues can be addressed. Education, outreach, and context appropriate engagement will be conducted to ensure that the fair housing violations or complaints are reflective of reality and align with actual experiences of residents. Finally, a focus on the rental market including ways to educate and train landlords and property owners as well as tenants is conducted. The City often partners with Idaho's Intermountain Fair Housing Council as well as Idaho Legal Aid to address Fair Housing concerns. The City will continue to work with these partners to immediately address Fair Housing impediments as well as any additional impediments identified in the Housing Study.

*Have you considered the risk of displacement associated with your proposal? How will you ensure that your planned activities do not lead to the displacement of vulnerable residents in communities of color? Describe any anti-displacement measures included in your proposal (e.g., replacement of affordable units for new construction, or right of first refusal for tenants)?*

The proposal aims to develop policy strategies that will help prevent displacement of affordable housing and encourage construction of new, affordable housing. These will be developed as the plans are completed and adopted. In addition, the RENEWAL program will occur concurrently throughout the period of performance to bolster the existing affordable housing and improve access to affordable housing. Primarily, the RENEWAL loan and grant programs will preserve the existing affordable housing. Acquisition and down payment assistance, however, will directly result in additional affordable housing. Therefore, inherent in the programs, displacement will be avoided and placement into housing will be a direct outcome.

*How will your proposal address the housing needs of people with disabilities and increase their access to accessible and affordable housing? How will it support independent living with access to supportive services and transportation in the community? Please also describe your plan to ensure compliance with the Americans with Disabilities Act (ADA) and accessibility requirements under the Fair Housing Act.*

The City's PRO Housing proposal identifies several ways to address the housing needs of persons with disabilities. In the planning phase, concerted outreach efforts will be conducted to reach these

target populations. The City partners with LIFE Inc. as well as New Day Products, local non-profit organizations that work with persons with disabilities, in order to better reach the target population. This input and feedback will be sought for plan development. Further, the actions proposed through the RENEWAL programs will directly improve independent living and compliance with ADA and accessibility requirements. The RENEWAL property rehabilitation loan and grant programs often result in installation of ramps, handrails, accessible bathrooms, and other repairs that provide accessibility improvements. Similarly, the sidewalk program directly improves mobility and accessibility not only for the residents but also any users of the sidewalks which are available to the public. The City has adopted ADA standards and has a right-of-way inspector that reviews plans and work to ensure compliance with these codes and regulations. These requirements are included in the scopes of work for projects and will ensure those requirements are met.

Finally, for new construction, the City partners with local non-profit partners who have adopted visitability and Universal Design standards to ensure the home is fully accessible and provides enough additional features to support long-term use by people with mobility limitations as well as features that improve usability, safety, and health for a more diverse group.

*Describe the implementation and/or enforcement plan for your proposal. Describe how you will approach resistance (e.g. litigation, environmental review, design standards) to the elimination of your targeted barrier(s).*

The City employs staff that are responsible for administering the City Code and ordinances. Prior to the adoption of any code changes or ordinances, the City's Legal Department reviews the proposals to ensure legality with all local, state, and federal laws. As part of these changes, Legislative Public Hearings are also held by the City Council prior to adoption. After adoption, code and ordinances are administered and enforced by the proper City Departments. In regards to environmental review requirements, City Staff have implemented the requirements under 24 CFR Part 50 as well as any other NEPA requirements for federal funds. Staff are well versed in these requirements and will implement them prior to any actions.

*Describe any equity-related educational resources, tools, or public input that have informed your proposal.*

The City relied on its Consolidated Plan, Analysis of Impediments to Fair Housing, and Citizen participation Plan to address equity concerns. In addition, it utilized the CEJST tool and the Justice40 recommendations for identifying target areas for the programs. The City's Housing Study will include equity considerations and use those recommendations to improve proposed projects and actions.

*Do you plan to engage and support minority-, women-, and veteran-owned businesses during your proposed housing production process? Do you have a diversity and equity plan in place or plan to create one?*

The City of Pocatello encourages all Section 3 and disadvantaged business enterprises to submit bids for projects. It has adopted a Section 3 preference for applicable property rehabilitation and



facility projects. In regards to engagement, the various outreach and engagement techniques that directly reach the target populations through language sensitive materials, various mediums of outreach, event attendance, and one-on-one contact through stakeholder relationships will all be used.

*Other equity considerations informed by your local circumstances*

N/A

*Describe how you will evaluate the effect of your proposal on promoting desegregation, expanding equitable access to well-resourced areas of opportunity, and furthering the de-concentration of affordable housing*

The Housing Study will provide a comprehensive look at where the existing affordable housing is in the community. The Study will also result in strategies and tools that can be used to address affordable housing needs, with an emphasis on citywide strategies for achieving this. Over the course of the program, the City will be able to implement these strategies and track where development and construction of affordable housing occurs. In addition, Staff will be able to track where RENEWAL program investments are made.

*How will you track your progress and evaluate the effectiveness of your efforts to advance racial equity in your grant activities?*

The City has a baseline of client and beneficiary data from previous CDBG program years. The City will continue to track this as part of the PRO Housing program and review the demographic makeup of beneficiaries. The City will then compare this with previous years' beneficiaries to see if grant activities are addressing the target populations and if there is racial equity amongst recipients.

*If the applicant proposes to use PRO Housing funds to fund housing units, the applicant must discuss how those benefits will be affirmatively marketed broadly throughout the local area and nearby areas to any demographic groups that would be unlikely or least likely to apply absent such efforts.*

The City has an adopted affirmative marketing plan in its CDBG Policies and Procedures. The City will use this plan to identify clients for acquisition projects and ensure any Subrecipients or Program partners who will be marketing housing units also use a comparable plan. (Please see Attachment F – Reference Documents, for the CDBG Policies and Procedures).

v. **What are your budget and timeline proposals? (5 points)**

The proposed period of performance is February 10, 2025 through September 30, 2030. The proposed budget and timeline is as follows:

**Table 11**

| Item                         | Cost         | Timeline for Completion |
|------------------------------|--------------|-------------------------|
| Housing Study                | \$150,000.00 | June 2025 – Dec 2026    |
| Neighborhood Plans (6)       | \$300,000.00 | Jan 2026 – Dec 2027     |
| Zoning Code Title 17 Rewrite | \$125,000.00 | June 2025 – Dec 2026    |

|                                        |                       |                      |
|----------------------------------------|-----------------------|----------------------|
| Projects Recommended from Plans        | \$125,000.00          | Jan 2026 – June 2030 |
| RENEWAL Rehab Grants/Loans             | \$850,000.00          | Ongoing              |
| RENEWAL Sidewalks                      | \$400,000.00          | Ongoing              |
| RENEWAL Acquisition & Infill/Rehab     | \$1,000,000.00        | Ongoing              |
| RENEWAL Down payment Assistance        | \$375,000.00          | Ongoing              |
| Long-Range Planning                    | \$1,121,250           | Ongoing              |
| Fair Housing Planning & Administration | \$60,000              | Ongoing              |
| <b>TOTAL</b>                           | <b>\$4,506,250.00</b> |                      |

The budget estimates were calculated by City Staff using costs for recently completed plans and the costs of current programming multiplied by projected demand and use of the program. In addition, staff time for long-range planning was calculated using current salary and fringe rates and estimating them with a 2.5% annual increase for the period of performance (See Exhibit F – Leverage for additional detail).

If awarded a different amount, the City will reduce the scope of the phases in order to achieve most goals. For plans, the neighborhood plans will be prioritized based on greatest need using the Housing Study and existing data sources. Similarly, the actions will be reduced such as fewer rehabilitation grants and loans issued or fewer acquisitions. The City would make reductions commensurately and complete plans, projects, and actions in priority order based on need.

## Exhibit E Capacity

DRAFT

**a. What capacity do you and your Partner(s) have? What is your staffing plan? (10 points)**

The City of Pocatello has a Planning and Development Services (PDS) Department with two Divisions that will oversee and lead the programs and implementation of the PRO Housing proposal: the Planning Division and Neighborhood and Community Services Division.

The PDS Department employs a full complement of planning staff in the Planning Division who would oversee the plans and programs. This includes: Planning and Development Services Department Director, Long-Range Planner, two Senior Planners, Assistant Planner, and the Management Assistant. The Planning Staff have extensive experience completing long-range plans as well as managing and working with the City's Zoning Ordinance. Recently, the Planning Department completed the Historic Downtown Development Plan and citywide Comprehensive Plan 2040: Our Valley | Our Vision. Both of these plans were completed in-house using the Staff expertise and experience in completing similar plans. The Planning Division is underway with a Parks and Recreation, Open Space, and Trails plan, which will serve as a master plan for the various outdoor amenities and areas in the City, as well.

The Neighborhood and Community Services (NCS) Division employs five full time staff including: Grants Manager, Grants Administrator and Compliance Analyst, Property Rehabilitation Specialist, Lead Program Administrator, and a Public Outreach and Grant Coordinator. The NCS Division primarily administers and manages the City's HUD-funded programs including the City's Community Development Block Grant (CDBG) Program and Lead Safe and Healthy Homes (LSHH) Program. The City has been a CDBG entitlement community since 1997 and NCS has administered and managed those funds since receiving entitlement funding. The Lead safe and healthy Homes program was founded after the City received a competitive grant award from the Office of Lead Hazard Control and Healthy Homes in 2017 and again in 2021. As noted in the PRO Housing proposal, many of the programs are currently operated by the NCS Division, particularly the RENEWAL program. The NCS staff would continue to implement the actions under the PRO Housing Proposal, specifically the rehabilitation, acquisition, and down payment assistance programs. The rehabilitation work is contracted out and would continue to be managed by the Property Rehabilitation Specialist and Lead Program Administrator. The other programs may require additional or part-time staff to be hired for completion and will be addressed as part of service delivery. Alternatively, the programs may require use of subrecipients, such as NeighborWorks Pocatello or Gateway Habitat for Humanity, to ensure spending of the funds and completion of the affordable housing preservation and increase in access to affordable housing through acquisition and down payment assistance. The City has worked with both agencies to develop housing through the acquisition and infill programs since 2008 and has long-standing relationships with the agencies. If additional partners are needed, however, the City has established partnerships with other non-profits as well as other entitlement communities around the state upon which it can build additional capacity for implementing the PRO Housing proposal.

As a municipal corporation, the City has the jurisdiction and authority to effectively implement the proposal. Furthermore, the City has long-implemented these programs through its CDBG programs, and already has contract documents, property development agreements, general terms

and conditions, and policies and procedures in place that conform with HUD requirements including 24 CFR 570 and 2 CFR 200.

Any consultants used for the development of the Plans (Housing Study, Neighborhood Plans, and Zoning Ordinance rewrite) would be procured in accordance with 2 CFR 200 as well as state and local procurement requirements. Staff would support the consultant and oversee these projects as part of their regular duties. Other local partners would contribute as they do with other Citywide plans, as members of working groups, focus groups, task forces, or committees as needed. As is noted in the various attached letters of support (see Attachment XX), the City has several partners who work with the target populations on similar affordable housing work who are willing and able to provide support in various capacities to ensure program success.

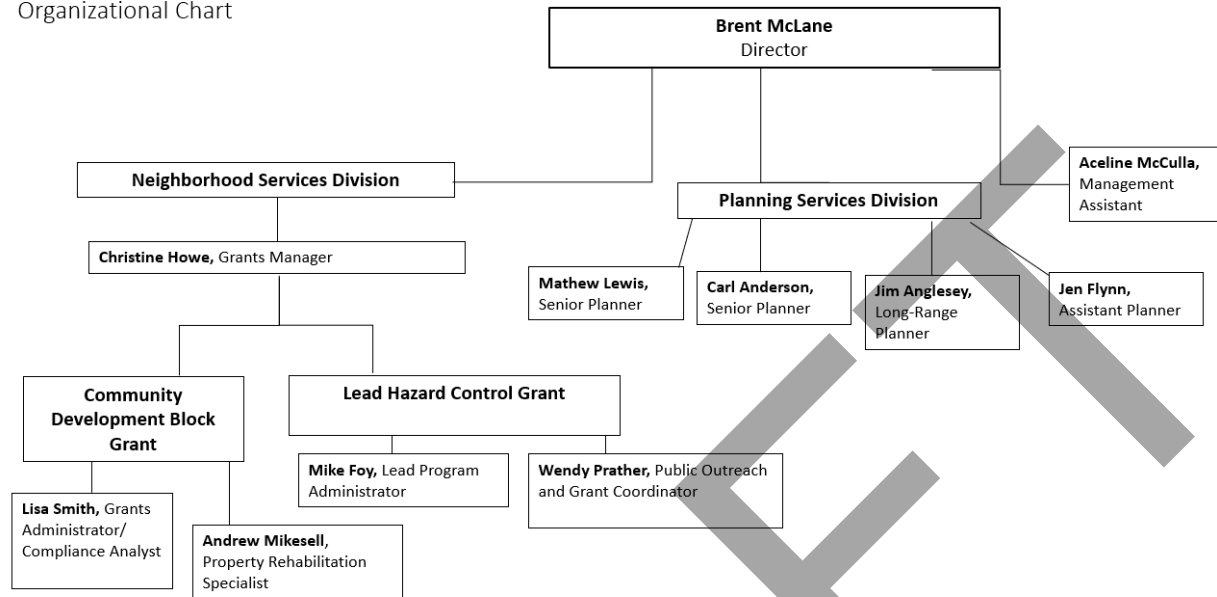
The City of Pocatello's PRO Housing Proposal was written by City Staff. The application was primarily developed by the Grants Manager with input from PDS Staff and data collection by the Grants Coordinator/Compliance Analyst. Grant application review was provided by the City's Public Outreach and Grant Coordinator, Assistant Planner, and Public Works Project Manager. All staff are employed by the City of Pocatello.

The NCS Division in the City is responsible for administering and managing the City's CDBG program. As a part of that, the City has an adopted Analysis of Impediments to Fair Housing (AI) plan and the NCS Staff serve as the points of contact for Fair Housing Act-related questions, complaints, concerns, or issues. The NCS Division, in its CDBG work, ensures compliance with the Civil Rights Act by including conditions in its subrecipient agreements, contracts, and all other relevant documents. Additionally, the City of Pocatello Human Resources Department is responsible for the City Personnel Policies which include such provisions including nondiscrimination, equal employment opportunity, and other related provisions. While the City has not quantified tangible reductions in racial disparities and has not required that data collection of partnering organizations, the City is prepared to work with local partners to analyze this information and make its best efforts to address this. As noted in the application, this will be a component of the Housing Study with a specific focus on those identified census tracts in which racial disparities may arise.

The following organizational chart identifies the names and positions of key management for the PRO Housing proposal. This organizational chart represents the existing management structure and staff roles and does not anticipate any contingent positions nor are there any vacancies at this time. The PRO Housing activities will be managed primarily by the Grants Manager and Long-Range Planner, with additional contributions from the other eight PDS Staff. Therefore, a total of 10 full time employees will contribute to the management of the PRO Housing activities in various capacities.

# City of Pocatello

## Planning & Development Services Department Organizational Chart



## Exhibit F Leverage

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The PRO Housing Program will leverage existing CDBG entitlement funds, Lead Safe and Healthy Homes program funds, and City General Funds that have been appropriated for the Housing Study and in-kind City Staff time for planning efforts.

**Table 12: Summary of Leveraged Funds**

| <b>Item</b>                                              | <b>Leverage Fund Source</b>                                                                         | <b>Total</b>       |
|----------------------------------------------------------|-----------------------------------------------------------------------------------------------------|--------------------|
| Housing Study                                            | City General Funds                                                                                  | \$50,000           |
| Property Rehabilitation Work -<br>Program Grants & Loans | CDBG Entitlement Program<br>Years 2025-2029<br><br>Lead Hazard Control and<br>Healthy Homes Program | \$500,000          |
| Sidewalk Repair and<br>Replacement – Grants              | CDBG Entitlement Program<br>Years 2025-2029                                                         | \$150,000          |
| Planning & Administration                                | CDBG Entitlement Program<br>Years 2025-2029                                                         | \$60,000           |
| Long-Range Planning                                      | City General Fund – In-<br>Kind Staff Time                                                          | \$1,121,250        |
|                                                          | <b>TOTAL</b>                                                                                        | <b>\$1,881,250</b> |

The leveraged funds include City general funds appropriated for the Housing Study, totaling \$50,000. The City’s PRO Housing proposal seeks to expand the scope of the Housing Study to ensure elements of Affirmatively Furthering Fair Housing are incorporated in the study and to provide an additional emphasis on affordable housing preservation and creation in the strategic priorities and plan recommendations. The total cost of the Housing Study will be \$150,000 with \$50,000 in leverage funds and \$100,000 in PRO Housing grant funds.

The City’s RENEWAL program is fully funded through its CDBG entitlement funding. The City anticipates leveraging CDBG funds for the property rehabilitation grants and loans for service delivery and project costs. The PRO Housing program will enhance the RENEWAL program and its outcomes. PRO Housing will fund \$450,000 worth of RENEWAL grants and loans over the period of performance with \$100,000 of CDBG funds leveraged for the program and \$350,000 in PRO Housing funding. Similarly, the City’s RENEWAL sidewalk program will be leveraged to support and enhance the PRO Housing actions. The City anticipates using \$150,000 in CDBG entitlement funds for sidewalks during its program years 2025 through 2029. This will cover service delivery and sidewalk grants in addition to the PRO Housing funding of \$250,000, for a total sidewalk action plan of \$400,000.

The CDBG Program is administered by City staff. The program staff will ensure compliance with CDBG entitlement funding regulations and align resources with the goals of the PRO Housing Program including fair housing activities which will leverage Planning and Administration funds from CDBG. Reporting, Fair Housing Activities, Program Administration, Financial reporting, Consolidated Plan alignment, federal regulatory requirements including 24 CFR Part 57, and more will be leveraged with CDBG funds. This is anticipated to be approximately \$12,000 per year which is about 15% of the estimated Planning and Administration funding of \$80,000 per program



year. This is a conservative estimate considering the fair housing activities that will be undertaken; however, using previous years' entitlements and trends for funding, a more conservative approach was warranted.

Finally, City Planning Staff time will be used as leverage through in-kind expenses. Planning Staff will oversee the Housing Study process and implementation as well as the Neighborhood Plans and Title 17 Zoning Ordinance rewrite. The City Staff time that will be leveraged includes all time allocated for long-range planning. This accounts for 90% of time for the City's Long-Range Planner and 25% of the other Planning Department Staff (Planning Director, Senior Planner, Senior Planner, Assistance Planner, and Management Assistant).

The following budget chart details the PRO Housing funded portions of the projects and the leveraged funds to be used during the period of performance (January 2024 through September 2029).

**Table 13: Budget Summary by Fund**

| <b>Item</b>                        | <b>PRO Housing Funds</b> | <b>Leveraged Funds</b> | <b>TOTAL Proposal Cost</b> |
|------------------------------------|--------------------------|------------------------|----------------------------|
| Housing Study                      | \$100,000                | \$50,000               | \$150,000                  |
| Neighborhood Plans (6)             | \$300,000                | -                      | \$300,000                  |
| Projects Recommended from Plans    | \$125,000                | -                      | \$125,000                  |
| Title 17 Zoning Ordinance Rewrite  | \$125,000                | -                      | \$125,000                  |
| RENEWAL Rehab Grants/Loans         | \$350,000                | \$500,000              | \$850,000                  |
| RENEWAL Sidewalks                  | \$250,000                | \$150,000              | \$400,000                  |
| RENEWAL Acquisition & Infill/Rehab | \$1,000,000              | -                      |                            |
| RENEWAL Down payment Assistance    | \$375,000                | -                      |                            |
| Long-Range Planning                | -                        | \$1,121,250            | \$1,121,250                |
| Planning & Administration          | -                        | \$60,000               |                            |
| <b>TOTAL</b>                       | <b>\$2,625,000</b>       | <b>\$1,881,250</b>     | <b>\$4,506,250</b>         |

The City has included a Letter of Commitment for the leverage funding (See Attachment C). The leveraged funds are equal to approximately 72% of the grant funds requested.

**Exhibit G Long-term effect**

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**a. What permanent, long-term effects will your proposal have? What outcomes do you expect? (10 points)**

It is anticipated that long-term effects would stem from the results of the plans' strategic priorities being implemented, preservation of existing affordable housing, construction of new affordable housing, and adoption of new zoning codes and regulations.

Upon completion of grant-funded activities, the City will have achieved the following:

- Plans:
  - Citywide Housing Study with a focus on low-income housing needs and availability
  - Six individual Neighborhood Studies
  - Title 17 Zoning Code Rewrite to remove barriers to affordable housing development
- Projects
  - Establish a Tax Increment Finance (TIF) district
  - Establish a Local Improvement District (LID)
  - Implement project recommendations from plans
- Actions
  - Property rehabilitation loans and grants for between 30-90 homes
  - Replacement of approximately 9,000 square feet of sidewalk
  - Purchase of six small lots or one large commercial property for redevelopment to create affordable housing in historically disadvantaged or other identified priority areas
  - Down payment assistance for 15-20 homeowners
- Other
  - Translation of vital documents to improve outreach and communication to limited English proficient populations
  - Enhanced outreach and engagement with community to improve awareness and education on programs
  - Identifying and addressing Fair Housing Act impediments
  - Strategies for long-term actions to address affordable housing needs
  - Adoption of code and policy changes to eliminate barriers

While the proposal seeks to achieve several goals, roadblocks may exist that inhibit goals. Roadblocks include: market conditions that may affect availability of contractors or supply of labor/materials to complete the proposed rehabilitation projects; market conditions that affect the acquisition of property; public engagement efforts that delay adoption of plans or code changes; and feedback that does not support proposed changes or plans. To address this, the City will be sure to conduct robust public engagement and education so all strategies are founded based on the feedback and desires of the community as well as informed by best practices and goals of improving affordable housing availability. The City will also consider ways to re-program funds for actions when market conditions seem to be unfavorable. For example, funds could be shifted from the rehabilitation loan program to the rehabilitation grant program, or the City could provide additional down payment assistance grants in lieu of acquisition if lots are not available for purchase. The proposal attempts to address several barriers by using a three-prong approach over the period of performance that will result in planning phases that will inform projects while also addressing “on the ground” concerns through the activities.

The proposal seeks to identify complementary, logical areas to enhance affordable housing based on a needs analysis conducted by the Housing Study. The Housing Study will ultimately determine where housing should be so that the target groups have access to economic opportunities, livable environments, city amenities, and resources. This includes consideration of other citywide plans, such as the Comprehensive Plan, Bannock Transportation Planning Organization (BTPO) Master Plan, and Pocatello Regional Transit (PRT) Master Plan, so that other long-range efforts, such as transportation expansion, can be incorporated into these strategies. Similarly, these stakeholders will be involved in the plan process so that as housing needs are addressed, complementary transportation services can be planned for, and the necessary accompanying resources are considered, by those entities and in their future plans. By continuing conversations and robust stakeholder engagement, the City will work to break down silos and ensure continuity of planning efforts and goals.

The proposal's three-prong approach addresses issues that many communities face and is based off of a municipal governance structure that is common for cities of this size. The Pocatello PRO Housing proposal can be scaled to smaller levels as needed, with an emphasis on the three prongs: planning, projects, and action steps with existing local partners. It can also be scaled up based on community needs through the development of more neighborhood plans, additional funding for larger developments, or funding for a specific project in a community district, business center, or neighborhood.

Pocatello's most significant environmental risks include its designation as an urban wildfire zone and the flood zone areas around the Portneuf River Flood Plain. The City employs a Science and Environment Administrator who will be included in the planning phases to ensure the proposal is in line with environmental goals and addresses any potential risks. In addition, these will be considerations for the appropriateness of housing, particularly as it concerns homeowner's insurance as a barrier to homeownership and the cost of housing. The City's Comprehensive Plan also includes a vision element for climate considerations. The Environmentally Resilient section, which will continue to inform projects and actions. As noted, the City will adhere to all environmental review requirements throughout the project. The City CDBG and LSHH program staff have extensive experience conducting environmental reviews in accordance with 24 CFR Part 50 and will continue to adhere to these regulations. In addition, the RENEWAL program policies and procedures conform with HUD standards for energy efficiency. All work contracted by the City also require adherence to building code requirements established by City and State code.

Overall, the PRO Housing program envisions success through the long-term, forward-thinking approach to address the affordable housing needs of the community while simultaneously preserving and encouraging the development of housing in the community for its most vulnerable residents. The completion of the Housing Study, neighborhood plans, and zoning rewrite will provide measurable deliverables and goals the City can work toward achieving and, more importantly, allocating City resources toward. While the three-prong approach will allow for quantifiable metrics, such as number of homes that receive grants or loans and amount of land acquired, the ultimate success will be in the development of plans and the participation of the key stakeholders, target populations, and underrepresented groups. The PRO Housing proposal will provide the information the City is lacking to be able to address the housing crisis in Pocatello and

address affordable housing needs. The plans and strategic priorities developed in those plans, as funded by the PRO Housing grant, will expand access to housing opportunities for neighborhoods with fewer resources, protected class groups, and vulnerable populations.

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**Attachment A - Summary of comments received on published Application and list of commenters by name/organization**

**Public Comment Period**

The City invited public comment on the application. The application was made available on the City website as well as a Notice of Public Comment Period published in the Idaho State Journal on September 18, 2024. The Public Comment period extended until 5PM on October 3, 2024.

[INSERT Public Comments]

**Public Hearing Comments**

In addition to the request for submission of written or verbal comments, the City also held a Public Hearing at the October 3, 2024 City Council meeting.

[INSERT COMMENTS RECEIVED]

## Legal Notice

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## City Council Agenda

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**NOTICE OF PUBLIC COMMENT PERIOD  
CITY OF POCATELLO PRO HOUSING APPLICATION**

The City of Pocatello seeks public comment on its round two grant application for the U.S. Department of Housing and Urban Development (HUD) Pathways to Removing Obstacles to Housing, or PRO Housing, competitive grant program.

The PRO Housing grant application would provide necessary funding to complete a Housing Plan, individual neighborhood plans, the Zoning Ordinance rewrite, and any resulting projects and activities that would support the development of affordable housing as well as preserve the City's existing affordable housing stock.

The draft grant application may be viewed at: <https://www.pocatello.gov/339/Community-Development-Block-Grant> or by contacting Neighborhood and Community Services Staff at 208-234-6186 or [chowe@pocatello.gov](mailto:chowe@pocatello.gov).

Written or oral comments may be submitted by 5PM MT on October 3, 2024 to the City's Planning and Development Services Department at 911 N. 7<sup>th</sup> Avenue, Pocatello, ID 83201 or to [chowe@pocatello.gov](mailto:chowe@pocatello.gov).

## Attachment C – Advancing Racial Equity

In accordance with Executive Order 13985, Executive Order on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government, and federal fair housing and civil rights laws, you must submit a narrative demonstrating the following:

- The City used most recent demographic data available by the US Census to analyze the racial composition of the persons or households who are expected to benefit from the proposed grant activities. The project scope includes the entire City of Pocatello, Pocatello City limits which have a demographic makeup that is primarily white alone, with the those reporting as Hispanic or Latino at 9.6% per census population estimates from 2023. When comparing to CDBG beneficiaries from 2023, it shows that the CDBG programs serve a greater proportion of the minority income populations. This trend is projected to continue, as studies have shown that non-white communities are more likely to live in lower income housing which is the target of the program.

| <b>Race and Hispanic Origin</b>        | <b>Census Population Estimates 2023</b> | <b>CDBG Beneficiaries PY23</b> |
|----------------------------------------|-----------------------------------------|--------------------------------|
| White alone                            | 86.20%                                  | 84.41%                         |
| Black/African American                 | 1.40%                                   | 3.13%                          |
| Asian                                  | 2.40%                                   | 0.91%                          |
| Amer. Indian/Native                    | 1.50%                                   | 6.01%                          |
| Native Hawaiian/Other Pacific Islander | 0.10%                                   | 0.30%                          |
| Other multi-racial                     | 6.00%                                   | 5.22%                          |
|                                        |                                         |                                |
| Hispanic or Latino                     | 9.60%                                   | 14.11%                         |
| Not Hispanic/Latino                    | 90.40%                                  | 85.89%                         |

- As detailed in Soundness of Approach and Need, the City identified any potential barriers to persons or communities of color equitably benefiting from the proposed grant activities and will implement measures to ensure these barriers are addressed and these communities are able to benefit from the programming through outreach efforts. The activities will include targeted outreach, publishing materials in the languages spoken by the target populations, going to the population where they are living, ensuring outreach is ADA-compliant and conducted in locations that are accessible.
- As noted in Soundness of Approach and Need, the City will implement steps to prevent, reduce or eliminate these barriers; and
- The City will track progress and evaluate the effectiveness of its efforts to advance racial equity in the grant activities specifically by looking at the beneficiary data and comparing to demographic data for the project areas, as shown above for other CDBG programs.

## **Attachment D – Affirmative Marketing**

The housing, services, or other benefits provided under this grant will be affirmatively marketed broadly throughout the project area and nearby areas to any demographic groups that would be unlikely or least likely to apply absent such efforts. Such demographic groups may include, Black and Brown persons or communities, individuals with limited English proficiency, individuals with disabilities, or families with children. Activities to do so will include outreach through community contacts or service providers or at community centers serving the target population; and marketing on websites, social media channels, television, radio, and print media serving local members of the targeted group. The City has numerous relationships with public service agencies that interact daily with each of these target groups and will use those relationships to ensure program information and opportunities are distributed. The City employs a Public Outreach and Grant Coordinator who will work to ensure grant program benefits reach the target demographic groups. Finally, the City will follow the CDBG Affirmative Marketing policy per its Policies and Procedures.

## **Attachment E – Experience Promoting Racial Equity**

The City of Pocatello has experience working with and administering programs to effectively address the needs of underserved communities. The City has experience soliciting, obtaining, and applying input from such groups when designing, planning, or implementing programs and activities.

The City actively engages numerous groups for public input in a variety of methods in order to reach these groups. This includes using multiple forums, languages, and platforms to conduct outreach and solicit these programs to the underserved communities. The City uses data and resources to identify where these target populations reside and provide direct outreach, typically through direct mailers, fliers, and attendance at community events. The City Planning Staff has done such outreach through the development of its comprehensive plan, consolidated plan, and more. Additionally, the City employs a Public Outreach and Grant Coordinator to focus on these efforts. The City has an adopted Language Access Plan, Title VI Plan, and EPA Non-discrimination plan.