



**An Application For An
Idaho Community Development Block Grant**

Benewah County
on behalf of the
Santa Water & Sewer District
and
Fernwood Water & Sewer District

Sewer System Upgrades

November 18, 2011

**Jack A. Buell, Chairman
Benewah County Commission**

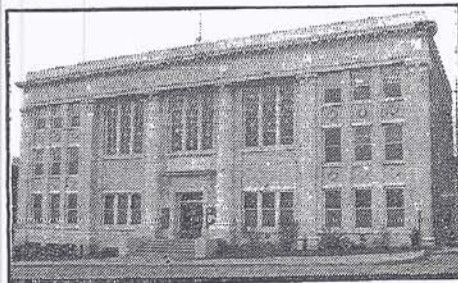
**Henry Lewis, Chairman
Fernwood Water & Sewer District**

**Mike Spray, Chairman
Santa Water & Sewer District**

Board of
County Commissioners
245-2234

Clerk District Court
Auditor and Recorder
245-3212

Treasurer and
Tax Collector
245-2421



Prosecuting Attorney
245-2564

Assessor
245-2821

Sheriff
245-2555

Coroner
245-2611

County of Benewah
701 W. College Avenue
St. Maries, Idaho 83861

November 14, 2011

Mr. Jeffrey Sayer, Director
Idaho Department of Commerce
PO Box 83720
Boise, ID 83720-0093

RE: Santa & Fernwood Sewer Systems Upgrades

Dear Director Sayer:

Benewah County respectfully submits this application for an Idaho Community Development Block Grant on behalf of the Santa Water & Sewer District and the Fernwood Water & Sewer District. The collections systems are old and contain many cracks, rocks and tree roots that result in up to 23 times greater the flows than normal to the wastewater treatment facility. A few times these systems have overwhelmed the treatment facility, resulting in E. Coli violations and raw wastewater flows into the St. Maries River. As a result, both Districts are out of compliance with their EPA permit. Operations and maintenance activities are continuous to remove tree roots and debris from the pipes resulting in significant time and cost to both of the Districts.

Reconstruction of the wastewater collection systems proposed in this application is a comprehensive infiltration and inflow (I/I) abatement approach, including replacement of the defective collection lines, replace a pump station and upgrades to the wastewater treatment system. The voters of both Districts approved a bond on November 8, 2011 to fund improvements to the system.

Matching funds for this project include \$1,224,800 from DEQ. The ICDBG funding assistance will help these communities prevent costly permit violations and alleviate the financial burden of the low and moderate-income household by sustaining the rates within a reasonable cost, thereby improving the quality of life of the residents.

Thank you for your attention and consideration of our grant request.

Sincerely,

Jack A. Buell, Chairman
Benewah County Commission

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PART A

I. ICDBG Application Information Form

Applicant: Benewah County Chief Elected Official: Jack A. Buell, Chairman
 Address: 701 College Avenue, St. Maries, ID 83861 Phone: 208-245-3212
 DUNS#: 079261152 CAGE Code: 3UKS0

Subrecipient: Santa Water & Sewer District Chief Elected Official: Mike Spray, Chairman
 Address: PO Box 215, Fernwood, ID 83830 Phone: 208-245-3554

Subrecipient: Fernwood Water & Sewer District Chief Elected Official: Henry Lewis, Chairman
 Address: PO Box 215, Fernwood, ID 83830 Phone: 208-245-3554

Application Prepared by: Nancy Mabile, ED Planner Phone: 208-772-0584 x 3014
 Address: Panhandle Area Council, 11100 N. Airport Drive, Hayden, ID 83835

Engineer: Necia Maiani, P.E. Phone: 208-664-9382
 Address: Welch, Comer & Associates, 350 E. Kathleen Avenue, Coeur d'Alene, ID 83816

National Objective

- LMI Area
 LMI Jobs
 LMI Clientele
 Slum & Blight
 Imminent Threat

Project Type

- Public Facility/Housing
 Economic Development
 Imminent Threat
 Community Center
 Senior Center

Project Population to Benefit (Persons):

Total # to Benefit: 572 Total # LMI to Benefit: * % LMI to Benefit: * %

Project Description: Replace sewer collection system and replacement of air release valves for the Santa District; Replace and relocate lift station #1, sewer main extension and replacement of air release valves for the Fernwood District; and add flow meters, chlorine contact basin and circulation improvements to the Santa-Fernwood Wastewater Treatment Facility.

SOURCE	AMOUNT	DATE APPLICATION SUBMITTED	RESERVED/ CONDITIONAL AWARD	FUNDS COMMITTED/ CONTRACT AWARD DATE	DOCUMENTS IN APPENDIX
ICDBG	\$500,000				
Local Cash					
Local Loan**	\$1,224,800	01/12	06/12	06/12	I
In-Kind***					
County In-Kind***	5,000	N/A	11/11	11/11	I
EDA Grant					
State Grant					
Foundation Grant					
TOTAL PROJECT FINANCING	\$1,743,238				

*Census LMI is 54.5%. Income survey in process and will provided to the Idaho Department of Commerce mid-December 2011.

** Identify Loan Source(s): DEQ Date Bond or Necessary & Ordinary Passed: 11/08/11

*** In-Kind contributions include County Single Audit Act requirements.

II. Economic Advisory Council

The project involves sewer system improvements within the boundaries of the Fernwood Water & Sewer District and the Santa Water & Sewer District. In addition, improvements are proposed to the lift station at the wastewater treatment facility, which is under a Joint Powers Agreement between both Districts. One application is being submitted as the boundaries of the two Districts are within 5 miles of each other, share the wastewater treatment facility, and have similar sewer system issues.

The majority of the Santa sewer collection system is over 40 years old and is in poor condition. The poor condition of the system is evidenced by extremely high levels of inflow and infiltration (I/ I) observed for this system. Peak daily flows are approximately 23 times the dry weather flow, considered excessive to the threshold guideline identified by EPA. There have been two cases where there were sanitary sewer overflows into the St. Maries River from surcharging manholes; and there has been a case where there was wastewater back-up into a home from a root-clogged sewer main.

The Fernwood sewer collection system is in poor condition evidenced by high levels of inflow and infiltration (I/I) observed for this system. Peak daily flows are approximately 10 times the dry weather flow and also considered excessive levels of I/I to the EPA threshold guideline. The main station and several thousand feet of gravity sewer main feeding the lift station is located within the floodplain and is in violation of three requirements under the Idaho Wastewater Rule Design Requirements. These facilities are subject to flooding and inaccessible during runoff months. The Station has occasionally not been able to keep up with flows, which has resulted in raw wastewater flowing into the St. Maries River, posing a public health threat.

Treatment and discharge from the wastewater treatment plant is regulated by an NPDES discharge permit. There have been several violations issued by DEQ and EPA to both Districts for violations to their National Pollutant Discharge Elimination System (NPDES) permit. Both the Santa and Fernwood sewer systems have dilapidated collection systems. High sewer flows cause stress on the wastewater treatment facility resulting in E.coli levels beyond acceptable limits are released into the St. Maries River which is a health threat to human and aquatic life. Failure to comply with their NPDES permit results in penalties and fines, which will ultimately be passed down to the ratepayers, posing an additional financial burden on the LMI. In these hard economic times the ability of the LMI household to pay for additional sewer rate increases can easily move beyond affordability, and will cause undue hardship as a considerable number are elderly and low income.

Without improvement to the collection systems, the existing collection systems will degrade further resulting an increase in I/I. Subsequently, there will be insufficient capacity to convey waste loads to the treatment plant, limiting total system capacity. ICDBG investment in this project will significantly reduce public health and safety hazards, increase the service life and decrease maintenance costs, and reduce the potential for sewage overflows to surface waters.

The Districts do not have the funds to complete this project without ICDBG assistance. The Santa District has conducted breakfasts, bake sales and raffles to raise funds to rebuild a wastewater pump, and spent \$3,077 in the past year on repairs. The Fernwood Water & Sewer District has spent \$10,301 in the past year to help pay for maintenance and repairs to the system; pursued and I/I study and developed a plan of prevention. The residents of each District passed a bond issue for this project in November 2011. Matching funds for this project include \$1,224,800 DEQ Loan. ICDBG investment will assist these Districts to address the most significant of the inflow and infiltration (I/I) problems.

III. Threshold Criteria

A. ELIGIBLE APPLICANT:

- The applicant is a City. The Applicant is a County.

The project involves sewer system improvements within the boundaries of the Fernwood Water & Sewer District and the Santa Water & Sewer District. In addition, improvements are proposed at the wastewater treatment facility, which is under a Joint Powers Agreement between both Districts. One application is being submitted as the two Districts are less than 5 miles apart, have similar sewer system issues and share the wastewater treatment facility. Through the Joint Powers Agreement, a Memorandum of Understanding (MOU) is in the process of being created for completion of the sewer improvements for both Districts. All ICDBG funds will flow through Benewah County to the Districts under the MOU for construction improvements. Benewah County has contracted with Panhandle Area Council to oversee grant management activities. The Subgrantee Agreement between Benewah County and each of the aforementioned Districts that includes the Joint Powers Agreement between the Districts for the wastewater treatment facility is located in Appendix A.

B. ELIGIBLE ACTIVITIES:

Eligible activities for this project as outlined in Chapter 2 of the ICDBG Application Handbook include:

- Public Facilities and Improvements – for sewer collection system; lift station and wastewater treatment plant; and
- Administration Activities – Administrative costs for the ICDBG-certified grant administer and the County related to the ICDBG, including but not limited to the management, coordination and monitoring of activities necessary for effective planning, implementation and execution of the project.

C. NATIONAL OBJECTIVE:

Low- and Moderate-Income Area Benefit:

Total number of households* in project benefit area – **Fernwood:** 423

LMI Percentage Determined by:

- Census Data
 Income Survey
 Census and Survey

Total number of households* in project benefit area – **Santa:** 149

LMI Percentage Determined by:

- Census Data
 Income Survey
 Census and Survey

The Idaho Department of Commerce was contacted in May 2011 to check Census data for the Fernwood and Santa Districts. When combined, the result identifies the two block groups as 54.5% LMI. However, it was noted that because the block group boundaries for the two districts go well beyond the boundaries of the Districts, it was determined on November 2, 2011 that an income survey must be performed. This survey is underway and will be provided under separate cover to the Idaho Department of Commerce in mid-December. The email of the income survey requirement is in Appendix B.

D. CITIZEN PARTICIPATION

Public meetings were held on June 14, 2011 and September 13, 2011 at the community building in Fernwood to provide an overview of the problems associated with the sewer system, the recommended alternative, costs and schedule. On November 8, 2011, 40 of the 71 voters of the Fernwood Water & Sewer District and 29 of the 34 voters of the Santa Water & Sewer District provided the authority for the District to borrow up to \$1,224,800 for system improvements. District newsletters and public notices are in Appendix C.

Benewah County agreed to sponsor this grant application for the Fernwood Water & Sewer District and the Santa Water & Sewer District on October 6, 2011. The Citizen Participation Plan was most recently adopted by Benewah County on October 17, 2011. A Notice of Public Hearing to discuss the ICDBG application was published in the St. Maries Gazette-Record on November 2, 2011 and held at the Benewah County Courthouse on November 14, 2011. Copies of the Citizen Participation Plan, notice of public hearing, affidavit of publication, sign-in list of attendees, minutes and letters of support are provided in Appendix D.

Date of Notice 11/02/11 Date of Hearing 11/14/11

E. STATEWIDE GOALS AND STRATEGIES

- Preserved and enhances suitable living environments
 - Improve safety and livability of communities
 - Increase access to quality facilities and services
 - Improve affordability and sustainability of quality facilities and services

F. ADMINISTRATIVE CAPACITY

1. Fiscal Management

Audits are not performed for the Fernwood and Santa Districts. There have been no findings from previous monitoring or independent audits within the past five years for Benewah County. Neither entity has had staff turnovers of concern. There have been no recall elections for either District or the County. The audit letters for the past five years for the County and financial statements for each District are located in Appendix E.

2. Certified Grant Administration

Benewah County has procured an ICDBG-certified grant administrator for this project. The procurement documentation is in Appendix F.

G. FAIR HOUSING

Benewah County adopts and publishes the Fair Housing Resolution on an annual basis, regardless if they are a grantee on any federal funded projects. The most recent adoption of the Fair Housing Resolution was on October 17, 2011. This resolution will be published prior to submission of the Addendum. A copy of the current resolution and publication is provided in Appendix G.

H. ANTI-DISPLACEMENT POLICY

Benewah County will adhere to the Idaho Department of Commerce Anti-Displacement Policy by signature on the ICDBG Certifications page.

IV. Program Income

This project will not generate any program income as a result of the ICDBG-supported activities.

V. Project Description and Property

A. PROJECT DESCRIPTION:

The Santa Water & Sewer District was established in 1969 and serves 59 connections. The sewer collection for the Fernwood Water & Sewer District was constructed in 1982 and serves 179 connections. The Santa and Fernwood Water & Sewer Districts propose to complete sewer system improvements recommended in the Wastewater Facility Planning Reports prepared by Welch, Comer & Associates. The plan addresses alternatives to correct system deficiencies that include replacement of the sewer collection system and release valves, upgrades to lift stations addition of flow meters and chlorine contact basin. Maintenance is costly as there is considerable infiltration and inflow (I/I) and most components have exceeded their anticipated life span.

ICDBG and DEQ funds will perform the improvements recommended to repair system deficiencies as follows:

Santa Sewer

Santa Water and Sewer District intends to replace their sewer collection system including approximately 7,000 lineal feet of gravity collection mains and manholes.

Other upgrades to the sewer system will include replacement of air release valves along the District's force main to the wastewater treatment plant,

restoration of the Lift Station 2 wet well which is corroding due to hydrogen sulfide gas and upgrades to the pumps within that lift station which are aging and unreliable.

Fernwood Sewer

The District intends to replace (and relocate) the existing main lift station (Lift Station #1) which conveys the collected wastewater from the District to the lagoons. This improvement would include construction of gravity sewer and or/force main from the existing system to the new lift station and the abandonment of the existing lift station and gravity sewer main feeding the lift station.

Improvements will include a sewer main line extension to serve two existing (one active/one inactive) services which do not directly front the sewer main. The existing gravity sewer services are beyond their useful life.

Other upgrades to the sewer system will include replacement of air release valves on the Districts force main to the wastewater treatment plant which are buried and not functioning, manhole grouting and sewer main line replacements which are to be determined based on an inflow and infiltration investigation.

Santa-Fernwood Wastewater Treatment

The Santa and Fernwood Water and Sewer Districts intend to complete circulation improvements (through the modification of overflow piping) within the existing lagoon series, add influent flow meters and a chlorine contact basin in order to maximize treatment and meet NPDES permitting requirements.

Additionally, work will include completion of a groundwater monitoring plan and installation of monitoring wells as required to meet new rules that have been established under IDAPA to minimize leakage from lagoons.

The proposed improvements will protect public health, bring the systems into compliance with IDAPA and reduce operating and maintenance costs. The project will be bid under one general contract with add alternates as necessary to meet the project budget. Maps, photos, design and cost estimates are in Appendix H.

D. PROPERTY & PERMITS:

1. Has any property and easements been purchased for this project? Yes No
If yes, does the applicant have title to the property? Yes No

2. Will any property be needed for this project? Yes No
Status of purchase: _____
Estimated date of final purchase: _____
What funds were used to make this purchase? _____

3. Will any easements or rights-of-way be needed for this project? Yes No
Status of purchase: Pending _____

Estimated date of final purchase: February 2012
What funds were used to make this purchase? DEQ

4. Is anyone living on the land or in the structures at the proposed site? Yes No
5. Is any business being conducted on the land or in the structures at the proposed site? Yes No
6. Are there any businesses, individuals or farms being displaced as a result of this project? Yes No
7. Are there permits that will be needed for the project, i.e., well, water rights, land application, demolition permits, zoning permit, air quality permit, etc.? Yes No

Status of the permits (including plan for securing permits): EPA NPDES Construction General Permit to be secured by the contractor prior to construction for both the Santa and Fernwood District sewer system improvements. No permits are required for work at the wastewater treatment.

Describe the ownership or lease arrangements for the property involved in the project: All improvements fall within the existing easements or public rights-of-way with the exception that a portion of the improvements for Fernwood fall within right-of-way of an existing railroad owned and operated by Potlatch Corporation. It is anticipated that the District will be required to secure an easement.

VI. Budget Narrative

The following describes the funding sources by category and the commit status of each source. Documentation of match commitments is located in Appendix I.

GOVERNMENT

ICDBG GRANT – \$500,000 – Pending

These funds will be used for construction of the Santa Sewer Collection System (\$193,500); Fernwood Sewer Collection System (\$198,000); Santa-Fernwood Treatment Facility (\$58,500); and certified grant administration (\$50,000).

LOCAL MATCH

DEQ SRF Loan – \$1,224,800 – Pending

These funds will be used for District Administration, Easement, Engineering, Construction, Legal and Interim Financing as noted on the budget page.

VII. ICDBG Budget Form

Applicant/Grantee: Benewah County		Project Name: Fernwood-Santa Sewer Systems Upgrades		
LINE ITEMS	ICDBG CASH	DEQ SRF	COUNTY INKIND	TOTAL PROJECT
Administrative - ICDBG	\$50,000			\$50,000
Administrative - DISTRICT		\$19,004		\$19,004
<i>Santa</i>		\$8,172		\$8,172
<i>Fernwood</i>		\$8,362		\$8,362
<i>Santa-Fernwood</i>		\$2,470		\$16,534
Land, Structures, Rights-of-Way		\$10,000		\$10,000
<i>Fernwood</i>		\$10,000		\$10,000
Engineering		\$303,800		\$303,800
<i>Santa</i>		\$120,600		\$120,600
<i>Fernwood</i>		\$141,000		\$141,000
<i>Santa-Fernwood</i>		\$42,200		\$261,600
Construction	\$450,000	\$867,500		\$1,317,500
<i>Santa</i>	\$193,500	\$376,500		\$570,000
<i>Fernwood</i>	\$198,000	\$385,400		\$583,400
<i>Santa-Fernwood</i>	\$58,500	\$105,600		\$264,100
Legal - Bond		\$18,372		\$18,372
<i>Santa</i>		\$8,140		\$8,140
<i>Fernwood</i>		\$7,346		\$7,346
<i>Santa-Fernwood</i>		\$2,886		\$2,886
Interim Financing		\$6,124		\$6,124
<i>Santa</i>		\$2,714		\$2,714
<i>Fernwood</i>		\$2,448		\$2,448
<i>Santa-Fernwood</i>		\$962		\$962
Audit			\$5,000	\$5,000
TOTAL:	\$500,000	\$1,224,800	\$5,000	\$1,729,800

VIII. Detailed Cost Analysis

1. Have preliminary plans and specs been submitted to regulatory agencies for review? Yes No
If yes, list date submitted: _____
If no, list expected date to be submitted: February 2012
2. Has final design (for bidding) begun? Yes No
If yes, % complete: _____
If no, what is expected start date: April 2012
3. Will project include bid alternatives to meet project budget if necessary? Yes No
4. Are Davis-Bacon wage rates applicable to the project? Yes No
If yes, are they included in the project costs? Yes No
5. Have known environmental measures been included in the project costs? (e.g., dust mitigation, archeological survey, storm water drainage, wetland mitigation, etc.) Yes No
6. List the last date the owner and design professional discussed project design and details: On-going
7. Design Professional Cost Estimate may be found in Appendix H.

IX. Project Schedule

Project Activity	Date (to be) Completed	Documentation in Appendix
Design Professional Contract Executed	January 2012	F
Grant Administration Contract Executed	October 1, 2011	F
Environmental Release	May 2012	J
Bid Document Approval	May 2012	
Bid Opening	June 2012	
Construction Contract Executed	July 2012	
Start Construction	July 2012	
Construction 50% Complete	September 2012	
Second Public Hearing	September 2012	
Update Fair Housing Plan	August 2012	
Update 504 Review and Transition Plan	August 2012	
Certificate of Substantial Completion	November 2012	
Closeout	January 2013	

Name of Professional & Agency Contacts	Firm/Agency	Telephone	Topic
Tony Tenne Dennis Porter	Idaho Department of Commerce	208-334-2470	Project
Tim Komberec	Region I EAC Member	208-292-3857	Project
Necia Maiani, PE Dennis Ownbey, PE	Welch-Comer	208-664-9382	Project Engineers
Katy Baker-Casile, PE	DEQ	208-666-4640	Funding/Compliance
John Tindall, PE	DEQ	208-769-1422	Funding/Compliance
Tyson Clyne	DEQ	208-769-1422	NPDES Discharge Permit Compliance
Nancy Wolff	Morris & Wolff, PA	208-245-2523	Legal
Laura McAloon	K & L Gates	509-241-1532	Bond Counsel
Howard Lunderstadt	USDA RD	208-762-4939	Funding
Bill Burke	Idaho Rural Water	208-630-3209	I/I Studies – District Operating Assistance
Diane Sauer	Idaho Rural Water	208-343-7001	Rate Studies
Bill Davis	Potlatch	208-883-1674	Potential Easement in Existing Railroad Right-of-Way

X. Financial Profile

Is the Grantee a:

City County

If a sub-recipient, what type of organization?

Water District Sewer District Homeowner's Assn.
 For-Profit Company Non-Profit Company Water Association
 Fire District Hospital District
 Other (Explain) _____

Section II. Sewer System (only) – Input information for the sewer system (entity) that is expected to utilize the Idaho Community Block Grant funds.

Sewer Treatment Method Lagoon System

Do you have a Pre-treatment system? Yes No

	FERNWOOD	SANTA
Number of people served by the system	423	149
Number of residential connections on the system	169	59
Number of commercial connections on the system	10	3
Number of industrial connections on the system	0	0
Number of new connections within the last year	0	0
What are the current residential sewer rates?	\$ 43.00	\$ 43.00
When was the last rate increase?	09/01/11	01/01/09*
How much were the rates increased?	\$ 2.00	\$ 21.00
Residential Connection Fee	\$ 3,000.00	\$ 3,000.00
Commercial Connection Fee	\$ 3,000.00	\$ 3,000.00
Industrial Connection Fee	\$ 0.00	\$ 0.00
Annual Sewer System Revenue	\$ 90,662.00	\$ 28,382.00
Total dollar amount owed by customers in arrears	\$ 2,306.38	\$ 578.50
Annual Sewer System Expenses**	\$ 101,142.00	\$ 40,758.00

*The Santa Water & Sewer Board approved an increase of \$20.00 beginning January 1, 2012, bringing the rates to \$63.00 per month. The public hearing for this rate increase will be held on November 22, 2011.

**Letters from each District that provide an explanation on expenses exceeding revenues are in Appendix E in front of the financial statements for each respective District.

Identify outstanding indebtedness:

<u>District</u>	<u>Years Remaining</u>	<u>Annual Payment</u>	<u>Lender</u>
Santa Water & Sewer	6	\$4,092.00	USDA Rural Development
Santa Sewer	10	\$1,574.00	USDA Rural Development
Fernwood Sewer	1	\$7,977.00	Berkadia Comm Mortgage

Section IV. All Applicants

Land Use Planning related to Fair Housing

As part of the ICDBG program cities and counties are required to further fair housing within your community.

Coincidentally, the understanding and applicability of fair housing laws has become very important for cities and counties. In a recent legal case, Alamar Ranch LLC v. Boise County, a jury ruled that Boise County had committed three separate violations to the Fair Housing Act:

- (1) failure to make reasonable accommodations,
- (2) disparate treatment of the handicapped, and
- (3) intentional interference with the construction of handicapped housing

by changing a conditional use permit (CUP). Boise County is now required to pay the plaintiff \$4.0 million in damages.

In a recent state study of impediments to fair housing, an impediment that has been identified is the lack of cities and counties providing for the allowance of group homes in designated residential zones or their narrow definitions of the types of group homes allowed (e.g., nursing and rest homes) Why is this a barrier? The regulation may treat residents who are disabled, differently. Therefore;

Have you reviewed your zoning codes specific to group homes to ensure that you are in compliance with the Fair Housing Act? (group homes are allowed in residential zones and that your definition of a group home is not too restrictive)

Yes No

If No, what steps are you taking to address the issue? Benewah County does not have zoning regulations that address group homes within the County; therefore group homes are allowed in residential areas.

Another impediment identified in the state study is the lack of basic accessibility standards for new residential construction. Does your building code or ordinance encourage accessibility standards in housing? (example: at least one entrance with no step, doors at least 32 inches wide, switches no higher than 48 inches, hallways 36 inches wide, etc.)

Yes No

If Yes, explain the standards. Benewah County has not amended the adopted IRC building code to require additional requirements regarding additional accessibility standards for residential constructions.

XI. ICDBG Environmental Scoping – Field Notes Checklist

Applicant Benewah County Sub-Recipient N/A

This site and desk review checklist is to be completed by the Applicant and submitted with the application.

The purpose of the checklist is to help the Applicant and IDC better understand what environmental statutes or provisions per 24 CFR 58 might impact the proposed project. The information will assist in understanding what studies, documentation, and mitigation measures could be applicable and to assist in completing the environmental review record. The Applicant may choose to attach this scoping checklist as part of the environmental review record.

1. Limitations on Activities

Is the Grantee planning or in the process of acquiring property for this proposed project? Yes No

If yes, is the Applicant aware that land acquired or site work after submission of the ICDBG application is subject to 24 CFR 58.22 Limitation on Activities Requiring Clearance? Meaning once an application for ICDBG funds is submitted, neither Applicant or sub recipient, may commit Non-HUD funds to a project for land acquisition or site work (except for minor testing) before the environmental review is complete, unless the land acquisition or contract is conditioned on completion of the ICDBG environmental review.

2. Historic Preservation

Has the SHPO or THPO been notified of the project? Yes No

Have tribes with possible cultural and religious sites been notified of the project? Yes No

3. Floodplain Management

Is the project located within a floodway or floodplain designated on a current FEMA map? Check Web site www.store.msc.fema.gov Yes No Not Sure – Portions of the Fernwood Lift Station Improvement may be in the 100-year floodplain for the St. Maries River. This would be near existing sewer service connections, which would be re-routed as part of this improvement.

If yes what is the floodplain map number? 16009C0600D, September 25, 2009 and 16009C0440D, September 25, 2009

If the project is located in a floodway or floodplain, is the community where the project is taking place a participant in the National Flood Insurance Program. Check Web site www.idwr.idaho.gov/water/flood
 Yes No N/A

4. Wetland Protection

Are there ponds, marshes, bogs, swamps, drainage ways, streams, rivers, or other wetlands on or near the site? Yes No St. Maries River is located near the proposed improvements, but should not be impacted by the improvements. Instead, it should ultimately be protected by elimination of the potential for uncontrolled raw water discharge that exists at Fernwood Lift Station.

If yes, has the Army Corps of Engineers (Corps) been notified? Yes No

Has the Corps indicated what permit level will be required? Yes No N/A

5. **Sole Source Aquifers (Clean Water Act)**

Is the proposed project located over an EPA designated aquifer area? Yes No
(Check website www.epa.gov/safewater/ssanp.html)

Is it known at this time if construction will disturb more than one acre of land? Yes No

If yes, has a general permit for storm water discharges from construction sites been applied for from the EPA? Yes No This will be required as part of the construction contract.

6. **Endangered Species Act**

Has U.S. Fish and Wildlife Service, NOAA Fisheries, and Idaho Fish and Game Regional Office been notified about the project? Yes No

7. **Wild and Scenic Rivers Act**

Is the project located within one mile of a designated wild and scenic river? Idaho wild and scenic rivers include portions of the St. Joe, Lochsa, Selway, Middle Fork of the Clearwater, Snake, Rapid, and Middle Fork of the Salmon. Check Web site www.nps.gov/rivers/ Yes No

8. **Clean Air Act**

Is the project located in a designated non-attainment area for criteria air pollutants? Yes No

For building demolition or improvements, has an asbestos analysis been planned for or conducted?
 Yes No N/A

For housing rehabilitation, has a lead based paint assessment been planned for or conducted?
 Yes No N/A

9. **Farmland Protection Policy Act**

Is the project located on a site currently zoned as residential, commercial, and/or industrial?
 Yes No

Is the project area currently being utilized for farm or agricultural purposes? Yes No

If yes, has the USDA Natural Resource Conservation Service or local planning department been notified about the project? Yes No

10. **Environmental Justice**

Does project have a disproportionate environmental impact on low income or minority populations?
 Yes No

11. **Noise Abatement and Control**

Is the project new construction or rehabilitation of noise sensitive use (i.e., housing, mobile home parks, nursing homes, hospitals, and other uses where quiet is integral to the project functions)?
 Yes No

If yes, is the project located within 5 miles of an airport, 1000 feet of a major highway or busy road, or 3,000 feet of a railroad? Yes No

12. Explosive and Flammable Operations

Is the physical structure (not necessarily infrastructure) intended for residential, institutional, recreational, commercial or industrial use? Yes No Unknown at this time

If yes, are there any above ground explosives, flammable fuels or chemical containers within one mile of the physical structure? Yes No

If yes, have you been able to identify what the container is holding and the container's size?
 Yes No

13. Toxic Chemicals and Radioactive Materials

Are there any known hazardous materials, contamination, chemicals, gases, and radioactive substance on or near the site? Yes No Unknown at this time

If yes, explain _____

During the visual inspection of the site, are there signs of distressed vegetation, vents or fill pipes, storage/oil tanks, stained soil, dumped material, questionable containers, foul or noxious odors, etc.
 Yes No

If yes, explain _____

At this time, are the site's previous uses known to have been gasoline stations, train depots, dry cleaners, agricultural operations, repair shops, landfill, etc.? Yes No

Are other funding agencies requiring the Grantee to perform an American Society for Testing Materials (ASTM) environmental assessment? ASTM assessment involves analysis of site uses and ownership, inspection of site, and possible testing. Yes No

14. Airport Clear Zones and Accident Potential Zones

Is the project located within a designated airport runway clear zone or protection zone?
 Yes No

Does the project involve acquisition of land or construction/rehabilitation of building or infrastructure in an airport runway clear zone or protection zone? Yes No

If yes, is the grantee aware that the airport operator may wish to purchase the property at some point in the future as part of a clear or accident zone acquisition program? Yes No

15. Energy Efficient Designs

For building construction, has the owner investigated possible incentives from power providers, such as Idaho Power, Avista, or Utah Power for incorporating energy efficient design into their building?
 Yes No N/A

16. Sediment Control (Clean Water Act)

Will the construction project require storm and surface water discharge from the construction site?
 Yes No Unknown at this time

If yes, has an application to EPA been submitted for a Construction General Permit (CGP)?
 Yes No – This will be required as part of the construction contract.

16. Other Environmental Reviews

Have facilities studies or other environmentally related site reviews been conducted or in the process of being conducted? Yes No

If yes, identify who is conducting the review. Welch-Comer is preparing an Environmental Information Document for this project in accordance with DEQ requirements.

17. Information Letters

The advanced mailing of environmental information letters is sought in an effort to minimize the project’s timeline in waiting for necessary documentation or information. It will assist in earlier responses to required mitigation measures should the proposed project receive grant funding.

Check the agencies that have been mailed an environmental information letter.

Note: If other funding agencies have sought comment, in writing, from the agencies listed below for the same project, you may not need to send an information letter. Contact your Specialist if other environmental information or scoping letters have been sent.

- Idaho State Historic Preservation Officer
- Tribal Historic Preservation Officer or Tribal Office
- Idaho Department of Water Resources – Local Regional Office
- Army Corps of Engineers (if wetlands are applicable)
- U.S. Fish and Wildlife
- NOAA Fisheries (if salmon and/or steelhead are applicable)
- Idaho Fish and Game
- USDA Natural Resource Conservation Service (if farmlands are applicable)
- Idaho Department of Environmental Quality
- Local Government – Planning Department
- Others _____

Completion of the scoping checklist does not constitute that all environmental provisions or clauses related to 24 CFR 58 Environmental Reviews have been met or are known at this time.

Nancy Mabile
Completed By: Nancy Mabile

November 11, 2011
Date

Letters and back-up documentation that went to the above checked agencies on November 18, 2011. Documentation is in Appendix J.

PART B

XII. Review and Ranking Narrative

A. PROGRAM IMPACT *(To be calculated by Idaho Department of Commerce Staff)*

1. Percentage of ICDBG in total project: _____ %
2. Percentage of Local Matching Funds compared to grant funds: _____ %
3. Grant dollars per person: _____ %
4. Local matching funds per person: _____ %
5. Eligible Activity Priority Ranking:

Eligible Activity	Point Value	% of ICDBG Budget Spent on Activity	Staff Points Awarded
Acquisition of Real Property	100		
Acquisition of Real Property for Housing Projects	50		
Public Facilities and Improvements – Health and Safety Related	100	90%	
Public Facilities and Improvements – Housing Related	75		
Public Facilities and Improvements – Social Service Related	50		
Engineering/Architectural	100		
Code Enforcement	50		
Clearance and Demolition	10		
Removal of Architectural Barriers	50		
Rental Income Payments	0		
Disposition of Property	10		
Public Services	0		
Completion of Urban Renewal Projects	0		
Relocation Payments	25		
Planning Activities	0		
Administrative Activities	100	10%	
Grants to Nonprofit Community Organizations	0		
Grants to Nonprofit Community Organizations for Housing Projects	75		
Energy Planning	0		
Housing Rehabilitation	75		
Total Points Awarded to Project:			

B. NATIONAL OBJECTIVES – LOW AND MODERATE-INCOME

1. Low and Moderate Income Percentage Points:

As stated under National Objective in Part A of this application, according to Census data the two block groups for the Santa and Fernwood Districts are 54.5% LMI. However, since the block group boundaries for the two districts go well beyond the boundaries of the Districts, it was determined on November 2, 2011 that an income survey must be performed. This survey is underway and will be provided under separate cover to the Idaho Department of Commerce in mid-December.

2. Need and Impact:

a. Need:

Santa Sewer Collection

The majority of the Santa sewer collection system is over 40 years old and is in poor condition. The District did not video the system as evidenced through recent maintenance activities there are rocks and tree roots in the mains—a major deterrent to a video camera. The poor condition of the system is evidenced by extremely high levels of inflow and infiltration (I/ I) observed for this system. Peak daily flows (during or right after storm and high water events) is approximately 23 times the dry weather flow. The peak daily flow per connection is approximately 6 times higher than the “excessive” infiltration and inflow threshold guideline identified by EPA. This high level of I/I results in unnecessary pumping and treatment of stormwater.

There have been two cases where there were sanitary sewer overflows into the St. Maries River from surcharging manholes. In addition, there has been a case where there was wastewater back-up into a home from a root-clogged sewer main.

Replacement and restoration of the mechanical and structural components of the lift station is standard practice and is necessary for the continued reliability of the public sewer system.

The Santa Water & Sewer District has conducted breakfasts, bake sales and raffles to raise funds to rebuild a wastewater pump.

Fernwood Sewer Collection

The Fernwood sewer collection system is in poor condition as evidenced by high levels of inflow and infiltration (I/I) observed for this system. Peak daily flows (during or right after storm and high water events) are approximately 10 times the dry weather flow. The peak daily flow per connection is nearly 2 times higher than the “excessive” infiltration and inflow threshold guideline identified by EPA. This high level of I/I results in unnecessary pumping and treatment of stormwater.

Additionally, the main Fernwood lift station and several thousand feet of gravity sewer main feeding the lift station is located within the floodplain. These facilities are subject to flooding and inaccessible during runoff months. It is suspected that the current configuration of the lift station is a major contributor to the high I/I levels experienced by the system. Additionally, the existing lift station does not have sufficient capacity to pump the current estimated peak day demands and thus the surcharging in the sewer mains has been witnessed. Further, the Lift Station has occasionally not been able to keep up with flows resulting in raw wastewater discharging into the St. Maries River, posing a threat to public health.

Lift Station #1 does not meet Idaho Wastewater Rule Design Requirements, IDAPA 58.01.16 Section 440.01.b, which requires lift stations to be accessible by maintenance vehicles during all weather conditions. Additionally, the current lift station does not meet IDAPA 58.01.16, Section 440.01.a requires that lift stations constructed within the 100 year flood plain must be designed to protect electrical and pumping equipment during a 100 year flood event. With respect to capacity, Lift Station #1 does not meet IDAPA 58.01.16, Section 440.02.c(i) which requires that lift stations have sufficient capacity to supply peak hourly flow with any pump off line.

The Fernwood Water & Sewer District has raised rates several times to help pay for maintenance and repairs to the system; pursued and I/I study and developed a plan of prevention. Additional activities include:

- Located and dug up several buried manholes; installed sealed grade rings to bring the covers up to ground level to help determine which mains were allowing storm water entry during peak flows.
- Completely excavated several manholes, pressure washed, repaired the mortar and then coated with a foundation sealer.
- Commissioned Idaho Rural Water Association and a private contractor for sewer line video inspection.
- Removed rocks from the collection system and repaired the entry points.
- Rebuilt two sewer pumps.

Santa/Fernwood Wastewater Treatment

Treatment and discharge from the wastewater treatment plant is regulated by an NPDES discharge permit. There have been several violations issued by DEQ and EPA to both Districts for violations to their National Pollutant Discharge Elimination System (NPDES) permit. These violations are a result of discharges which exceeded the limits contained in the Permit and therefore in Violation of the Clean Water Act.

Both the Santa and Fernwood sewer systems have dilapidated collection systems. Sewer overflows causes stress on the wastewater treatment facility, which resulted in E.coli exceeding the limits set by DEQ and EPA.

Past violation letters for both Districts are in Appendix L.

b. Impact:

The proposed improvements to the Santa and Fernwood Districts collection systems are expected to reduce I/I, which has multiple benefits:

1. Reduced operating and maintenance cost due to reduced power to run the pumps as well as reduced wear on the pumps.
2. Increased capacity to serve future growth.
3. Reduced flow to the wastewater treatment facility. This will result in reduced operation and maintenance costs for the treatment and chemical process and will free up capacity. It is anticipated that reduction of inflow and infiltration will result in more stabilized flows to the treatment facility which will allow for improved treatment.

The collection system improvements in Santa are necessary to improve system reliability which will protect public health (due to risk of leaking sewer mains) and to reduce operating and maintenance costs which the community simply cannot afford. The proposed improvements for the Fernwood sewer system are necessary to protect public health from the risk of a spill from the Lift Station #1 into the St. Maries River or from leaking sewer mains, bring the system into compliance with IDAPA and lower operating and maintenance costs.

Improvements to the wastewater treatment facility are expected to improve treatment of wastewater and reduce operation and maintenance costs, which will ultimately maintain compliance with the discharge permit. Reduction of I/I in the Santa and Fernwood collection systems will also increase storage retention times and treatment as well at the wastewater treatment facility.

Failure to comply with their NPDES permit results in penalties and fines, which will ultimately be passed down to the ratepayers, posing an additional financial burden on the LMI. In these hard economic times the ability of the LMI household to pay for additional sewer rate increases can easily move beyond affordability, and will cause undue hardship as a considerable number are elderly and low income. The ICDBG will help alleviate the financial burden of the low and moderate-income household by keeping the rates down.

Eradication of the deteriorated components will eliminate safety hazards for operators, increase the service life and decrease maintenance costs, and reduce the potential for sewage overflows to surface waters. Without improvement to the collection systems, the existing collection systems will degrade further resulting an increase in I/I. Subsequently, there will be insufficient capacity to convey waste loads to the treatment plant, limiting total system capacity. When the treatment system is overloaded, wastewater with E.coli levels beyond acceptable limits are released into the St. Maries River which is a health threat to human and aquatic life. The project will eliminate this barrier by providing the means for business growth and development — the loss of which has elevated the LMI population in the County. Growth and development provides job opportunities, thus enhancing quality of life elements of good health, employment and basic living needs.

C. PROJECT CATEGORIES

Planning, Previous Actions and Schedule

1. Design Professional:

The Fernwood Water & Sewer District solicited Request for Proposals (RFP) on August 20, 2009. The RFP was advertised and proposals sent to four engineering firms. The Santa Water & Sewer District solicited RFP's for engineering services in February 2006. The procurement documentation currently available is in Appendix F.

2. Grant Administration:

Benewah County solicited proposals from qualified firms for grant writing and administration on August 23, 2011. Four companies were solicited but only one proposal was received. The County selected Panhandle Area Council on September 12, 2011. The procurement documents are in Appendix F.

3. Plan/Studies:

a. Survey of the existing conditions of the system or facility

Santa: The existing Santa sewer collection system is over 40 years old and in extremely poor condition. The system has excessive inflow and infiltration.

Fernwood: Inflow and infiltration is excessive in the Fernwood sewer collection system, which is primarily a result of poorly sealed manholes. Additionally, the capacity of the District's primary lift station is insufficient to convey peak flows from the collection system to the shared treatment facility.

Santa-Fernwood: The shared wastewater treatment facility has multiple deficiencies that must be corrected to bring the facility into compliance with the NPDES Discharge Permit.

The Table of Contents and Executive Summary for each facility plan is in Appendix L.

b. Size of the proposed new facility or system and why

Santa: The proposed improvements will not upsize the existing system but are expected to “free up” system capacity as inflow and infiltration should be significantly reduced. The additional capacity “created” as a result of the improvements would allow for new connections to be added to the system.

Fernwood: The proposed collection system improvements will not upsize the existing system but are expected to “free up” system capacity as inflow and infiltration should be significantly reduced. Improvements to the lift station will increase the existing capacity, which is necessary as the current pump capacity is insufficient for the current peak flows. As a result of the proposed improvements, it is expected that the system will have capacity to serve new connections.

Santa-Fernwood: The proposed improvements are expected to improve treatment efficiency which should thereby increase the treatment capacity.

c. Analysis of costs including rehabilitation versus new construction

Santa: The proposed improvement includes replacement of the existing collection system in lieu of rehabilitation. The existing collection system is depreciated and cannot be effectively rehabilitated. Areas of the existing piping are known to be clogged and severely overgrown with roots. Thus, the structure of the existing network (pipe and slope) is believed to be too compromised for effective rehabilitation.

Fernwood: With respect to the existing lift station, one of the improvement alternatives reviewed was reconstruction/rehabilitation of the lift station in place. This alternative is not recommended as the lift station and several thousand feet of gravity main feeding the lift station is in a floodplain and does not meet current state standards. Modification of the lift station at the current location would have potential environmental impacts and would be costly to upgrade to current standards which require protection from flooding. (Permits and environmental clearances associated with this option would also likely result in an increase timeline to complete the project.)

Santa-Fernwood: The proposed improvements make use of the existing facility. The proposed improvements will modify the existing facility to improve the efficiency of the existing operation.

d. Estimated useful life of proposed facility or system

The proposed improvements to the collection system (replacement of existing sewer mains and manholes) will have an expected useful life of 60 to 70 years. Lift station improvements will have an expected useful life of 20 to 60 years depending upon the component (i.e. the expected life of pumps and

electrical equipment is typically 20 years, while the piping and structure is expected to last 50-60 years.)

Improvements to the wastewater treatment facility will have an expected useful life of 20-60 years. (Meters typically have a useful life of 20 years while the piping improvements should last up to 60 years.)

e. Energy efficiency components in the design, materials or equipment

New pumping equipment will be selected to achieve the highest level of efficiency for the installation. The Engineer will evaluate the required horsepower and pump efficiency when selecting/specifying pumps for the new facilities.

f. Sketches or schematics showing general layout

Maps are included in Appendix H of this application.

g. Developed and screened alternatives to enable the system to meet future needs and growth

The Facility Plans review a minimum of 2 improvement alternatives plus a no action alternative.

Each improvement alternative consider projected system demands. The selected improvements are expected to eliminate a large percentage of inflow and infiltration and thus increase available system capacity which will allow for projected growth in the area.

h. Selection of a recommended alternative

After presentation of the proposed improvements to the public in June, the Districts considered comments provided by the public and selected the proposed improvements. Selection of the proposed improvements was based on:

- 1) Protection of public health and safety.
- 2) Improvements necessary to meet discharge permitting requirements and minimize the potential for enforcement action.
- 3) Reduction in operation and maintenance costs.
- 4) Estimated cost and consideration of the impact of associated rate increases to complete the improvements on the public.

i. Projected annual operating costs

Overall, the proposed improvements are expected to significantly reduce inflow and infiltration present in both Districts. Reduction in inflow and infiltration will result in reduced wastewater flows and thus reduced pumping and treatment costs.

j. Required permits

It is expected that the Contractor and Districts will be required to file as operators under the NPDES Construction General Permit and will be required to implement a Stormwater Pollution Prevention Plan.

Portions of the proposed improvements (in conjunction with the Fernwood Lift Station relocation, some existing services that are located within a floodplain will need to be reconfigured to pump to the new gravity sewer main outside the existing floodplain. Additionally, abandonment of the existing lift station will require some work within the existing floodplain. The Army Corps of Engineers will be contacted during preliminary design to determine the level of permitting required.

k. Site location considerations and potential impact of the project on the environment

Santa and Fernwood Sewer System Improvements: Proposed improvements are not expected to significantly impact the existing environment. Improvements will result in surface disturbance of more than one acre. Thus, best management practices will be required during construction to control stormwater discharges. In the long run, the proposed improvements should positively impact the environment by eliminating accidental spills or discharges onto the ground or into the St. Maries River due to inadequate capacity due to excessive inflow and infiltration.

Santa-Fernwood: The proposed improvements will not significantly impact the existing environment. The majority of the improvements will take place within the existing facility and thus will not result in major site/surface disturbance. The proposed improvements should result in an improved/more reliable treatment. Thus, treated wastewater discharged from the facility into the St. Maries River is expected to receive a higher level of treatment after the improvements are complete which would preserve and/or improve the existing water quality of the St. Maries River.

l. Water and Sewer System Projects

The Facility Plans for Santa Sewer, Fernwood Sewer and Santa and Fernwood Wastewater Treatment Facility will be submitted to IDEQ for review and approval in November 2012.

4. Environmental Scoping

The ICDBG Environmental Scoping – Field Notes Checklist is on page 14 of this application. Environmental request letters are in Appendix J.

5. Agency Viability:

a. Utility Rate Reviewed

Santa's utility rates were reviewed by the Idaho Rural Water Association in July 2010 and are in Appendix M. Fernwood's utility rates are currently under review by the Idaho Rural Water Association and will be provided under separate cover to the Idaho Department of Commerce in mid-December.

b. Completion of ICDBG financial profile worksheet

The ICDBG financial profile worksheet is on page 12 of this application.

6. Property Acquisition:

To be calculated by Idaho Department of Commerce staff based on information provided under the General Project Description, Project Land and Permits (page 6).

7. Funding Commitments:

To be calculated by Idaho Department of Commerce staff based on funding commitment letters in Appendix I.

8. Schedule:

To be calculated by Idaho Department of Commerce staff based on the project schedule on page 11.

9. Administrative Capacity:

a. The applicant's grant project track record and the general stability of the applicant and sub-recipient. Department staff may review financial audit reports, board make-up, staff turnover and recall elections to help make a determination

To be calculated Idaho Department of Commerce staff based on information provided under the Threshold Criteria, Administrative Capacity (page 4).

b. Completion of Section 504 of ADA Self Evaluation and Transition Plan. Applicants must submit the transition plan and the name of the ADA coordinator to certify which elements have been completed

Has the applicant completed a Section 504 or ADA Self Evaluation and Transition Plan?

Yes

No

Coordinator: Deanna Bramblet

- c. Document that Fair Housing Accessibility Standards have been adopted. Applicant must have adopted the standards either separately or inclusively with most current building codes utilized by the applicant

What is the most current building code the applicant has adopted?

2006 International Building Code

Are the Fair Housing Accessibility Standards a component of the County's building code?

Yes

No

10. Cost Analysis:

To be calculated by Idaho Department of Commerce staff based on the detailed cost analysis on page 10.

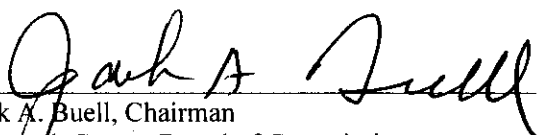
XIII. Certifications

I certify the data in this application is true and correct, that this document has been duly authorized by the governing body of Benewah County and we will comply with the following laws and regulations if this application is approved and selected for funding.

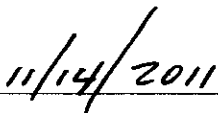
- National Environmental Policy Act of 1969
- Civil Rights Act of 1964 Pub.L 88-352
- Civil Rights Act of 1968 Pub.L 90-284
- Age Discrimination Act of 1975
- Rehabilitation Act of 1973, Section 504
- Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended (49 CFR Part 24)
- Housing and Community Development Act of 1974, as amended Pub.L 93-383
- Davis-Bacon Act (40 USC 276a - 276a-5)
- Historic Preservation Act
- OMB Circular A-87, and ensure that subrecipient complies with A-110 and A-122

- Section 106 of the Housing and Urban Recovery Act of 1983 certifying to:
 - Minimize displacement as a result of activities assisted with CDBG funds by following the Idaho Department of Commerce & Labors anti-displacement and relocation assistance plan;
 - Conduct and administer its program in conformance with Title VI and Title VIII, and affirmatively further fair housing;
 - Provide opportunities for citizen participation comparable to the state's requirements (those described in Section 104(a) of the Act, as amended);
 - Not use assessments or fees to recover the capital costs of ICDBG funded public improvements from low and moderate income owner occupants;
 - Abide by all state and federal rules and regulations related to the implementation and management of federal grants;
 - Assess and implement an Accessibility Plan for persons with disabilities in accordance with Section 504 of the Rehabilitation Act of 1973, as amended;
 - Adopt and implement an Excessive Force Policy;
 - Prohibition of Use of Assistance for Employment Relocation, Section 588 of the Disability Housing and work Responsibility Act of 1998 Pub.L 105-276.
 - Anti-Lobbying Certification: No federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned to any person for influencing or attempting to influence an officer or employee of any federal agency, a member of, employee of a member of, officer of or employee of Congress in connection with the awarding of any federal contract, the making of any federal grant or loan, the entering into any cooperative agreement and the extension, renewal, modification or amendment of any federal contract, grant, loan or cooperative agreement.

If any funds other than federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any federal agency, a member of, employee of a member of, officer of or employee of Congress in connection with this federal grant, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.



Jack A. Buell, Chairman
Benewah County Board of Commissioners



Date