

RATING FACTOR 1 – CAPACITY OF THE APPLICANT

1.1 Managerial and Technical Staff: *The Kilkich Accessible Housing Construction and Rehabilitation Project* will be managed by the Coquille Indian Housing Authority (CIHA), the Tribally-designated housing entity of the Coquille Indian Tribe. In 1954 the federal recognition of the Coquille Indian Tribe was terminated as part of the now repudiated Western Oregon Indian Termination Act (Public Law 588). For the next quarter of a century, the Tribe worked to have their rights returned and their recognition as a sovereign Tribal government restored by the Federal government. In 1989, these efforts were rewarded when President George H.W. Bush signed the Coquille Restoration Act into law. One of the earliest acts of the newly restored Tribal government was in 1992 when they created CIHA pursuant to the authority of the Tribe's Constitution and statutes.

For the last 27 years, CIHA has been responsible for establishing and maintaining safe, healthy, and affordable housing for Coquille Tribal members and other Native Americans living in the Kilkich community, which serves as the main residential reservation for the Tribe. The 1,100-acre parcel had been used as timber lands when the Tribe acquired it in 1993. In 26 short years, led by the talent and tenacity of CIHA, Kilkich is now home to 241 residents living in the 95 housing units located on the premises. This includes 63 housing units occupied by low-income American Indian or Alaska Native (AI/AN) families, 48 of which include Coquille Tribal members. 3 of the housing units are currently used for non-residential purposes that support the safety and wellbeing of the Kilkich community including the Coquille Indian Tribe Police Department administrative offices, the South Coast Interagency Narcotics Team administrative office, and Elders gathering house. CIHA operates its low-income housing program under support by the Tribe and with assistance of grant funding under NAHASDA. The track-record of

accomplishments, coupled with the ongoing management activities demonstrate CIHA's managerial, technical, and administrative capability necessary to undertake the key elements of the *Kilkich Accessible Housing Construction and Rehabilitation Project*.

Project Management Staff: CIHA has a staff of nine employees, all of whom have worked for CIHA for many years and whose experience in affordable housing and community development totals in excess of 125 years cumulatively. The *Kilkich Accessible Housing Construction and Rehabilitation Project* management team builds on the relevant and recent expertise of CIHA staff and is supported by contractors where needed. Key members of the project management team include:

Anne Cook (Executive Director/Project Manager): As Project Manager, Anne will oversee all day-to-day aspects of the project and serve as primary liaison with the CIHA Board of Commissioners and the Coquille Indian Tribe's Tribal Council. Anne has worked for CIHA for 17 years, the last 15 where she has served in the role of Executive Director. In the last five years, Anne has managed funds of more than \$9 million, including over \$5 million in grants funding, oversaw more than \$2.5 million in construction and rehabilitation projects including, the renovation and remodeling of 45 housing units, installation of three garden and park areas, and the construction of community support facilities such as the 20,480 sq. ft. CIHA Projects and Maintenance Operations and Storage Facility. Each of these projects was completed on-time, on-budget, and all associated administrative documents and grant reports were filed within the requirements of the funding program.

Lyman Meade (Deputy Director/Project and Logistics Coordinator): As Project Coordinator, Lyman will work with the Architect to finalize the new construction design, develop bid documents, and select a General Contractor. In addition, Lyman will work as the

owner's representative on the project where he will oversee construction and rehabilitation activities, inspect and verify quality of work, and address any unforeseen obstacles that may arise. In addition, Lyman will coordinate with the residents in neighboring properties to ensure the project proceeds with the least disruption to the community as possible. Lyman has more than 25 years of direct experience in planning, managing, and implementing rehabilitation, new construction, and other related projects and has owned and operated his own construction company. Lyman has worked for CIHA for 17 years, the last six of which he has served in the role of Deputy Director. Over the last five years, Lyman has provided project coordination and construction management on more than \$2.5 million of projects, including two Section 504 home conversions, rehabilitation of housing units and facilities, community improvements, and construction of new facilities.

Marcy Chytka (Accounting Services Coordinator/Financial Management): CIHA Accounting Services Coordinator Marcy Chytka oversees all aspects of CIHA's financial activities, maintains its records of account, and assures compliance with its financial management policies, HUD accounting requirements, generally accepted accounting principles, and other applicable laws and regulations. On this project, Marcy will coordinate multiple funding streams, ensure successful performance of all accounting functions, maintain complete and accurate records, compile and submit timely financial reports, and record and track all capital improvements to ensure proper compliance with ongoing useful life requirements. Marcy has 18 years accounting experience, including 15 years of service to CIHA. Over the past five years, Marcy has handled the receipt and expenditure of more than \$9 million for CIHA including multiple construction and rehabilitation activities in addition to its regular operations. Most notably, Marcy was directly responsible for financial management of the CIHA Projects

and Maintenance Operations and Storage Facility construction project, which totaled in excess of \$2.25 million and involved a complex financing structure combining grant, bond, loan, and private funds requiring compliance with stringent accounting and performance standards.

Debbie Dennis (Administrative Services Coordinator/Compliance Management): As a member of the project management team, CIHA Administrative Services Coordinator Debbie Dennis will support procurement, scheduling, construction, accounting, reporting, and other project activities to ensure timely implementation of the project in compliance with funding requirements, policies, regulations, and other applicable standards. In the past five years, Debbie has served as compliance liaison and maintained project files for all CIHA construction and rehabilitation work including the Projects and Maintenance Operations and Storage Facility Project where Debbie handled numerous compliance activities including ensuring sam.gov, licensing, insurance, and other qualification requirements were met; reviewing contractors and subcontractors for suspension and debarment; obtaining background checks for proposed contractor personnel; performing HUD Labor Standards employee interviews, tracking and reviewing certified payrolls, obtaining additional payrates for unrated classifications; and assuring posting requirements were met. In addition, Debbie recorded procurement activities, documented and photographed project progress, and provided logistical support. Debbie will perform these duties for the *Killich Accessible Housing Construction and Rehabilitation Project* as well.

Contractors and Supporting Functions: In addition to the management staff, the *Killich Accessible Housing Construction and Rehabilitation Project* will be supported through the efforts of a additional service providers and contractors including:

Rich Turi (Principle Richard P. Turi Architecture): Rich has provided conceptual design and budget estimating for this project. In addition, Rich will provide final design and preparation of bid documents for the *Killich Accessible Housing Construction and Rehabilitation Project*. As a licensed architect, Rich has designed 72 of the 95 housing units in the Killich community. In addition, Rich has provided architectural design for other Tribal projects including its Community Plankhouse and CIHA's Projects and Maintenance Operations and Storage Facility. Over the last five years, Rich has designed more than 74 structures in and around Coos County resulting in more than \$11 million of construction activity. Due to his knowledge of CIHA's housing program and his experience in local construction, Rich brings a wealth of experience to this project that can benefit CIHA in everything from design innovations in accessibility to evaluating contractors and sub-contractors.

Plan for Managing any Capacity Gaps: This project will require contracting with one or more qualified General Contractors. CIHA has developed a proven process designed to communicate the scope of work (bid documents), solicit proposals from qualified contractors (RFP process), review and evaluate proposals (screening process), as well as select and contract with a service provider (procurement process). These protocols and processes will be utilized for selecting the General Contractor(s), which at this point reflects the only anticipated gap in CIHA's capacity to undertake this project.

1.2 Procurement and Contract Management: In 1992, CIHA developed and adopted a Procurement Policy in consultation with HUD which is regularly reviewed and revised as needed. The last revision of the policy occurred in 2017 to ensure compliance with the updated procurement standards of 2 CFR Part 200 and 24 CFR Part 1000. The CIHA Procurement Policy applies to all contracts for supplies, services, and construction entered into by CIHA as well as

all CIHA expenditures for public purchasing regardless of the resource. The adopted procurement policy states, “*All procurement transactions shall be administered and executed by the Contracting Officer, who shall be the Executive Director or other individual he or she has authorized in writing.*” The last independent audit completed for CIHA was last year (FY2018) and the auditors findings stated, “in our opinion the Coquille Indian Housing Authority complied, in all material respects, with the types of compliance requirements referred above (*includes reference to 2 CFR Part 200*) that could have direct or material effect of its major federal program for the year ended September 30, 2018” (italicized comment added for clarification). Specific adopted policies that demonstrate this compliance include:

- *Procurement Authority:* “Solicitation procedures are conducted in full compliance with federal standards stated in 2 CFR §200.317-326, the Indian preference requirements and methods of procurement in accordance with the applicable NAHASDA regulations...”
- *Cooperative Purchasing:* “CIHA may enter into interagency agreements to conduct direct procurement based on economy and efficiency...CIHA may utilize governmental excess and surplus property programs instead of purchasing new equipment and property if suitable for the purpose of the procurement.”
- *Procurement Procedures:* The policies describe procedures that conform to the required elements of 2 CFR Part 200.320(d) for competitive bidding. The process requires 1) preparation and publish a solicitation for written proposals, 2) submission with an adequate number of proposals from qualified sources, 3) review of submitted proposals based on previously developed written evaluation criteria, 4) interview or other final screening of top qualifying proposers, and 5) negotiation of contract with selected proposer.

- *Contractor Oversight:* “Contracts will contain guidelines for inspection of supplies, services or construction, as well as monitoring contractor performance, status reporting on construction contracts and similar matters.”
- *Conflicts of Interest:* “CIHA prohibits its officers, employees, and agents from participating directly or indirectly in the selection or in the award or administration of any contract if a conflict, real or apparent, would be involved.” (the policy goes on to define officers, employees, or agents, their relatives, their partner, and/or an organization that employs, or is negotiating to employ, any of the above.)

The Conflict of Interest policy above, also meets the requirements of 24 CFR Part 1000.30.

Policies that address 24 CFR Parts 1000.48-54 include:

- *Tribal and Indian Preference:* “CIHA shall, to the greatest extent feasible, provide preference first to Tribal member-owned economic enterprises and organizations, and then to Indian-owned economic enterprises and Indian organizations in the procurement of small purchases”
- *Protests Involving Indian Preference:* “Complaints arising out of any of the methods of providing for Indian preference shall be handled in accordance with the procedures prescribed by the NAHASDA regulations at 24 C.F.R. 1000.48-52.”

1.3 IHBG Expenditures: CIHA is not approved for investing formula IHBG funds. Therefore, Option #1 under this criteria will be used for evaluating administrative capacity. Between the last three years (2016-2018) CIHA has received \$3,298,302 in IHBG formula funds. On May 7, 2019, when the NOFA for this program was published, CIHA had \$0 in HUD’s Line of Credit Control System. This reflects no undisbursed balance of cumulative funding for the last three fiscal years.

1.4 Findings:

For the rating period of October 1, 2015 through August 8, 2019, CIHA has not been monitored or received monitoring reports from HUD's Northwest Office of Native American Programs. However, CIHA's annual financial audits for the period and annual self-monitoring program reports, included in their entirety in their Annual Performance Reports, do not identify any open findings or concerns.

1.5 Timely Reports: As a recipient of HUD-ONAP grants, CIHA regularly produces and submits required reports, including Indian Housing Plans, Annual Performance Reports, and Federal Financial Reports (SF-425). CIHA diligently submits these reports in a timely fashion within required deadlines. Such is the case for the submission of these reports in the one-year period prior to the publication of the NOFA for this program (May 7, 2019).

RATING FACTOR 2 – NEED/EXTENT OF PROBLEM

2.1 Identified Needs and Other Supporting Data: The *Killich Accessible Housing Construction and Rehabilitation Project* is designed to address the housing shortage facing AI/AN populations in southwest Oregon by constructing new housing units and rehabilitating existing housing units on the Killich Reservation.

2.1a Identified Needs: The information below reflects the required discussion on need factors, project type, and proposed project activities:

Need Factors: Except where otherwise noted, the following data is derived from the FY2020 HUD Formula Response Form (FRF) for CIHA. The formula area for CIHA consists of overlapping areas including the "Coquille Reservation, OR- Coos County, OR", the remainder of Coos County, along with Curry, Jackson, Douglas, and Lane counties. The Bureau of Indian Affairs estimates the Total Resident Service Area Indian Population for CIHA to consist of 5,186

AI/AN individuals. However, the FRF shows a capped AI/AN population for CIHA of 2,174 in the formula area. The need factor findings for CIHA's formula area as reported in the FRF include:

- Households with housing cost burdens greater than 50% of formula annual income. (171)
- AI/AN households which are overcrowded or without kitchen, or plumbing. (52)
- Housing shortage in formula area. (357)
- AI/AN households with annual income less than or equal to 30% of median income. (141)
- AI/AN households with annual income between 30% and 50% of median income. (131)
- AI/AN households with annual income between 50% and 80% of median income. (142)

Project Type: The *Kilkich Accessible Housing Construction and Rehabilitation Project* combines both the construction of 3 new housing units along with the rehabilitation of 3 existing housing units.

Project Activities: All of these housing units will be incorporated into CIHA's existing income-indexed Low Rent program specifically to benefit low income Indian families. The *Kilkich Accessible Housing Construction and Rehabilitation Project* calls for constructing 3 new housing units and rehabilitating 3 existing units constructed in 1996. The rehabilitation activities will focus on three single family units each constructed in 1996. Specifically, the rehabilitation will address deteriorating conditions in these homes and convert them into Section 504 of the Rehabilitation Act compliant housing that will accommodate disabled tenants and allow elders to age in-place – two populations that disproportionately are low-income and experience the most severe shortage in appropriate housing.

The new construction consists of building a 1,215 sq. ft. 2-bedroom, 2-bath single family home and a duplex with two 990 sq. ft. 2-bedroom, 2-bath units. Construction will take place on

two vacant lots in the Kilkich community. The necessary infrastructure (water, sewer, utilities) are all available at the street and will not require additional build-out. Each of the new housing units will be Section 504 compliant and include design features similar to those described below.

The rehabilitation element of this project focuses on three 20-year old single family units. Each of these units is showing deteriorating conditions that if left unaddressed will substantially limit the usable life of the buildings. The units are each 3-bedroom, 2-bath, which are in high demand for residents with disabilities and elders as they accommodate room for family and/or live-in caregiver(s). Further, the rehabilitation approach will slightly expand each of these units to accommodate larger bathrooms that provide adequate turn area to enhance accessibility. After rehabilitation and construction, two of the units will be 1,292 sq. ft. and the other will be 1,318 sq. ft. In addition, to mitigating deteriorating conditions, these units will each be converted to be Section 504 compliant, including:

- *Barriers:* Removal of physical barriers in the kitchen, living room, and other areas to enhance overall accessibility.
- *Kitchen:* Lowering kitchen cabinets and counter heights, installing self-closing doors, developing roll-up work areas, and installing stoves with controls on the front for easy access.
- *Bathroom:* Install roll-in showers, grab bars, accessible toilets, and accessible cabinets, mirrors and water faucets. In addition, the design will allow for adequate turn space.
- *Closets:* Widen the doors and lower the clothes rods and shelves.
- *Doorways:* Widen doorways and install lever handles.
- *Flooring:* Install hard surface flooring throughout.

- *Entries:* Install low profile thresholds, entrance ramps, lever handles, and replace sliding door with passage door.
- *Electrical:* Raise electrical outlets as well as lower light switches and install rocker switches.
- *Resource Conservation Measures:* Incorporate sustainable design elements including water conservation fixtures, solar tubes in expanded bathrooms, LED lighting, and exhaust fans.

Collectively these activities will address the shortage of affordable housing for AI/AN populations by 1) increasing the overall housing inventory, 2) increasing the overall housing inventory for low income AI/AN persons, 3) addressing accessibility needs for disabled and elder populations, and 4) extending the life expectancy of existing housing units by at least 20 years.

2.1b Other Supporting Data: In 2018 the United Way of Southwestern Oregon commissioned a study to identify the housing obstacles and opportunities facing the incorporated and unincorporated areas of Coos County. The resulting “Coos County Oregon Housing Analysis and Action Plan” provides a comprehensive overview of the conditions facing the AI/AN populations in greater Coos County. Key findings include:

- *Aging Population:* “Coos County’s median age increased from 43.1 to 48.2 years old between 2000 and 2016. The percentage of residents aged 62 and older grew from 22.5% to 29.5%.” (pg. 6). “The county’s median age has increased by 12% since 2000 making Coos County the 10th oldest county in the state and these older households are aging in place to a greater extent than the state in general.” (pg. 28)
- *Expanding Housing Costs:* “Housing costs have increased significantly despite a static population and declining workforce. This is partially attributable to speculation in the vacation home market.” (pg. 8)

- *Shrinking New Home Construction*: “Based on the lack of population growth, stagnant incomes, and an aging population with little need for new homes, it is no surprise that housing production has nearly ground to a halt.” Between 1950-2010 the average number of new homes built per year in the county was 401. Since 2010 the annual average has plummeted to just 73 countywide. (pg. 9)
- *Shortage of Affordable Housing*: “CZB (*authors of the study*) calculates that the county is short roughly 1,100 units for those earning less than \$20,000.” (italicized entry added for clarification). (pg. 12)
- *Increase in Cost Burden*: “Indeed, nearly 90% of low-income renters in Coos County are cost-burdened, meaning they spend more than 30% of their income on housing expenses.” (pg. 12)

Each of these findings demonstrates the challenges that AI/AN populations face in finding affordable housing in the greater Coos County area. However, collectively, these findings illustrate the grim conditions facing populations that are historically marginalized in housing, including low-income, aging and disabled, and AI/AN populations.

CIHA’s “Indian Housing Plan” submitted to HUD NWONAP on June of 2019 also provides insight into the housing issues impacting the AI/AN populations served by CIHA. Specifically, the plan identifies overcrowded households, substandard housing units needing rehabilitation, and disabled households needing accessibility as housing needs impacting low-income AI/AN populations in the Kilkich community.

While the Coos County Oregon Housing Analysis and Action Plan” provides a countywide overview of housing issues and CIHA’s “Indian Housing Plan” provides an overview of Kilkich specific housing issues, CIHA *FY2018-2022 Strategic Plan* provides insight into the strategies

and priorities that are being undertaken to address these issues. Key objectives adopted in the strategic plan include:

- *Development of income-indexed rental units to serve the independent living needs of Coquille Tribal elders and persons with disabilities.*
- *Provide accessibility features and reasonable accommodation for persons with disabilities as required or financially feasible.*
- *Operate income-indexed Low Rent Program units on Tribal Lands for qualified low- to moderate-income Tribal members and other Native Americans and Alaska Natives.*

2.2 Project Beneficiaries: The beneficiaries of the *Kilkich Accessible Housing Construction and Rehabilitation Project* will be low-income Tribal members and other AI/AN persons who will benefit from having an increase of affordable housing options that include accessibility features that are designed to empower individuals, provide accommodations for individuals with disabilities, and help elders age-in-place. This project will directly serve six AI/AN families. CIHA's application process includes capturing information on household income as means of identifying eligibility for various programs and services. In addition, the application process includes an area where individuals can identify the specific amenities and accessibility accommodations they are seeking and/or require. Finally, CIHA routinely has waiting lists of eligible low-income families, including Tribal elders and individuals with disabilities looking for housing. The current waiting list totals 27 families. These systems and processes that are already in-place will provide the resources necessary for CIHA to ensure that they will be able to identify the beneficiary families to be served by this project in a timely manner.

2.3 Past Efforts to Address Identified Need: CIHA has constructed 81 housing units on the Kilkich Reservation since they were formed in 1992. The last new home construction undertaken

by CIHA was in 2003 when they constructed one new single-family housing unit on the Kilkich Reservation. The unit was constructed for CIHA's lease-purchase homebuyer program and contained some, but not full, accessibility features. Since that time, CIHA has been actively engaged in a robust effort to structurally rehabilitate and modernize the 72 original units developed with 1937 Housing Act funds. As such, resources have not been available to allocate towards construction of new units.

Of the four housing units retrofitted to Section 504 compliance, one transitioned to the lease-purchase homebuyer program, one is used for activities of community elders, and two remain in the Low Rent program. Retrofit of the two Low Rent rentals was completed in FY 2012 and FY 2016. The primary obstacle to increasing the rate of Section 504 conversion in rehabilitation projects has been the lack of available resources.

2.4 Current Funding Assessment: CIHA's allocation of IHBG funding hasn't changed since 1999. However costs have continued to climb resulting in a reduction of buying power by approximately 35% over the last two decades. CIHA has received some financial support from the Coquille Indian Tribe. However, as a Tribe terminated in 1954 and restored in 1989, the Coquille Indian Tribe has been rebuilding its entire governmental capacity from essentially the ground up. The ability of the Coquille Indian Tribe to provide substantial funding support for CIHA programs has been further exacerbated by the remnants of the Great Recession of 2008. While much of the country has recovered economically, the southwestern Oregon coast still lags significantly behind the state and the nation in household income levels and civilian employment rates. As a result, the Coquille Indian Tribe has been required to make substantial investments in health care, social services, and employment programs to meet the needs of the Tribal members.

Unfortunately, these investments have directly reduced the available funds to support new housing development and/or rehabilitation projects.

2.5 Sustainability: As discussed previously, the *Kilkich Accessible Housing Construction and Rehabilitation Project* is reflective of the goals and priorities as enunciated in CIHA's Strategic Plan and will result in mitigating the overcrowded conditions and the deteriorating conditions of some older housing units. In addition, this project also directly addresses the long-term vision and goals of the Coquille Indian Tribe's "Empire Comprehensive Plan" which was adopted in 2018 and is used to guide the Coquille Indian Tribe's development decision-making related to the entire Kilkich Reservation and addresses future housing growth, infrastructure development, transportation systems, as well as future economic development activities on the Kilkich Reservation. The findings of the Comprehensive Plan include anticipated population growth in the Kilkich community through at least 2030 and with it an increase in demand for affordable housing. Further, the plan goes on to note, that there is substantial "*Potentially high rate of housing obsolescence (outdated housing stock) is driving a pent-up demand for new housing, despite modest development activity*" (page 27). The plan also identifies development standards including but not limited to housing zones and density standards. This project supports the overall vision of this plan and conforms to the adopted standards outlined in the plan.

CIHA is prepared to commit to sustain the housing units developed in this project and operated them in accordance with Section 205(a) of NAHASDA, to ensure that each housing unit will remain affordable, according to the binding commitments satisfactory to HUD, for the remaining useful life of each property. To accomplish this, CIHA will utilize Indian Housing Block Grant (IHBG) funds to operate and maintain the units. As evidenced by past Annual Performance Reports, this approach has proved to be effective and efficient. In addition, CIHA

has adopted a Low Rent Maintenance Policy that defines processes and procedures. This provides the framework for which the maintenance standards of the properties will be sustained. Finally, as noted in above, the *Killich Accessible Housing Construction and Rehabilitation Project* supports the goals and priorities of the Coquille Indian Tribe's *Empire Comprehensive Plan* and CIHA's *Strategic Plan* by adding three additional affordable housing units that are also Section 504 compliant and remodeling an additional 3 units to make them Section 504 compliant.

RATING FACTOR 3 – SOUNDNESS OF APPROACH

3.1 IHBG Competitive Priorities: The *Killich Accessible Housing Construction and Rehabilitation Project* directly addresses new construction of affordable housing and rehabilitation of affordable housing – two of the IHBG Competitive Grants program priorities. Individually and collectively, these activities address critical housing shortages and further the availability of affordable housing in CIHA's service area.

3.1a New Housing Construction Projects: CIHA is requesting a grant of \$1,274,985 from the IHBG Competitive program. \$815,990 or 64% of the grant funds will be used to carry out the construction of three new affordable housing units for IHBG eligible families. The remainder of the grant funds will be spent on other eligible activities (Housing Rehabilitation Projects).

3.1b Affordable Housing-Related Infrastructure Projects: This project does not utilize any IHBG Competitive grant funds for housing-related infrastructure projects.

3.1c Housing Rehabilitation Projects: CIHA is requesting a grant of \$1,274,985 from the IHBG Competitive program. \$458,995 or 36% of the grant funds will be used to carry out the rehabilitation of three existing affordable housing units for IHBG eligible families. The

remainder of the grant funds will be spent on other eligible activities (New Housing Construction projects).

3.1d. Other NAHASDA- Eligible Activities: This project does not utilize any IHBG Competitive grant funds for other NAHASDA-eligible projects.

3.2 Project Implementation Plan: The following are the key elements of the project implementation plan:

Feasibility and Cost Effectiveness: The project calls for construction of three new housing units and rehabilitation for three existing housing units. The site of the new construction is on vacant lots within the existing housing developments of the Kilkich community. The sites have been approved for housing and meet CIHA and Coquille Indian Tribe development standards. Further, the required infrastructure is available to the curb and will not require additional build-out. The new construction costs are estimated to be \$150/ sq. ft. and the rehabilitation costs are estimated at \$76/sq. ft. As such, both of these elements of the project are feasible and cost-effective.

Rationale Behind Project Design: The design of the new construction housing units is based on previous construction undertaken by CIHA and updated to meet Section 504 standards. The architect working on this project has provided design and documents for 72 of the 95 housing units constructed in the Kilkich community. As such, the new units will be consistent with the rest of the community and CIHA will enjoy cost savings and the benefit of lessons learned from building on an established design.

The design for the rehabilitation of the three units is based on a similar rehabilitation completed in FY 2012. The design elements center around accessibility, independent living, and the ability to age in place.

Location of the Project: The project will be located in the Kilkich community of the Coquille Indian Tribe's Reservation. The land utilized for the project is land held in trust for the Coquille Indian Tribe and CIHA has been authorized to utilize this land for the housing purposes described in this project. To assist in understanding the location of the project, a map has been included in the attachment section of this grant.

Train or Employ Residents Consistent with Section 3 of the Housing and Urban Development Act: Under the IHBG program, CIHA is not required to comply with Section 3 due to the adoption of an Indian Preference ordinance. However, CIHA is open to amending their procurement policy to include a Section 3 provision modeled on the Tribal preference provision.

Compliance with Indian Preference Requirements: The adopted CIHA Procurement Policy includes a provision that states, "*Projects developed and operated with assistance under NAHASDA are subject to Section 7(b) of the Indian Self-determination and Education Assistance Act (25 U. S. C. 450e(b)).*" In addition, the Coquille Indian Tribe has adopted Tribal contract preference requirements in its Fiscal Management Ordinance, Coquille Tribal Code, §160.200(6)(c). In compliance with 25 U.S.C. 4111(k) Tribal preference is applied first and , and only if there is not Tribal contractor that meets those requirements, will the Indian Preference requirements be applied. Further, the procurement policy states, "Eligibility for Tribal preference shall be established in accordance with Coquille Tribal Code Section 160.200(6)(c). Eligibility for Indian preference shall be established in accordance with procedures consistent with NAHASDA. If CIHA or its prime contractor determines an applicant ineligible for Tribal or for Indian preference, CIHA or the prime contractor shall notify the applicant in writing before contract award, or filling the position, or providing the desired training."

Affordability Period: CIHA will establish a minimum affordability period for the newly constructed houses as well as the three rehabilitated units of 20 years, this will ensure the units will remain available to IHBG-eligible families for the remaining useful life in accordance with Section 205 of NAHASDA.

Estimated Cost Savings: The energy efficiency measures included in the three new and the three rehabilitated housing units will result in an estimated cost savings of 20% per year.

Size, Number, Address, and Types of Units: The following reflects a summary of the housing units incorporated into this project:

- *New Construction:* Duplex at 498/500 Miluk Drive. Each unit will be 990 sq. ft. in living space with 2 bedrooms and 2 bathrooms.
- *New Construction:* Single Family Dwelling at 2665 Miluk Drive. The unit will be 1,215 sq. ft. of living space with 2 bedrooms and 2 bathrooms.
- *Rehabilitation:* Single Family Dwelling at 708 Jis-ta-jia Circle. This unit will be 1,292 sq. ft. after remodel with 3 bedrooms and 2 baths.
- *Rehabilitation:* Single Family Dwelling at 2608 Mexeye Loop. This unit will be 1,318 sq. ft. after remodel with 3 bedrooms and 2 baths.
- *Rehabilitation:* Single Family Dwelling at 2659 Mexeye Loop. This unit will be 1,292 sq. ft. after remodel with 3 bedrooms and 2 baths.

3.3 Project Implementation Schedule and Project Readiness:

3.4 Budget:

RATING FACTOR 4 – LEVERAGING RESOURCES

As evidence by the Resolution from the CIHA Board of Commissioners , CIHA will provide \$25,000 in IHBG funds and \$400,000 in non-program funds to support this project. This reflects total leveraged funds of \$425,000 or 25% of the total IHBG Competitive Grant project costs.

RATING FACTOR 5 – COMPREHENSIVENESS AND COORDINATION

5.1 Coordination: CIHA has engaged and involved community members, Tribal members living outside of the community, as well as leadership and staff from the Coquille Indian Tribe in identifying housing goals, formulating responsive strategies, and implementing effective solutions. The involvement and inclusion of the community and collaborative partners is evident in the processes that have led to the formation of the *Kilkich Accessible Housing Construction and Rehabilitation Project* plan and implementation strategy. For instance, CIHA produces a monthly newspaper *Sea-Ha Runner* that provides information on activities in the community, invites community participation in meetings and planning sessions, and helps connect the community with CIHA staff and board. CIHA also participates in monthly meetings of the Kilkich residents Association (KRA) where needs are identified, strategies are formulated, and collaborative efforts are launched. Further, the residents and other stakeholders are invited to provide insight and information at the monthly meetings of CIHA Board of Commissioners and/or Tribal Council work sessions.

The instruments mentioned above reflect regular monthly activities that provide ongoing and institutional ways that the voice of the community and the collaboration with other Tribal departments and stakeholders are incorporated. However, CIHA also strives to involve community members and collaborative partners in a series of annual project review and planning processes. For instance, each year CIHA prepares an Annual Performance Report (APR) to assess outcomes and obstacles, an Indian Housing Plan (IHP) to set goals and outcomes, and a

Master Projects List to set priorities. The community and stakeholders are invited to participate in Board meetings, attend information gathering sessions at Tribal events and the local library, and/or review and comment on the Tribal members-only website, My Tribe, or the Authority's public webpage.

Finally, community members and stakeholders also enjoy robust engagement in comprehensive planning processes undertaken by CIHA and/or the Coquille Indian Tribe on a frequent – but not annual basis. For instance, in 2017 CIHA undertook a strategic planning process that resulted in the formulation and adoption of CIHA *FY2018-2022 Strategic Plan*. Similarly, the Coquille Indian Tribe updated their Strategic Plan in 2018. The planning process utilized by the Tribe included community listening sessions and a survey, which was completed by 33 percent of Tribal members 14 years of age or older. In July of 2018, the Tribe completed a comprehensive planning process for the Reservation, which includes the Kilkich Community. This process was led by a multi-disciplinary team which included representatives of CIHA, Tribal Council, Tribe's Executive Team, THPO office, Tribal Natural Resources, CEDCO (the Tribe's business arm), MEDC (the Tribe's economic development organization), along with representatives of Coos County, City of Coos Bay, City of North Bend, and the Charleston Sanitary District. In addition, the planning process included outreach to the Tribal members and the residents of the Kilkich community to identify needs and formulate strategies around housing, transportation, open spaces, and economic development for the Reservation lands.

The elements of the *Kilkich Accessible Housing Construction and Rehabilitation Project* are directly derived from the community engagement planning processes and reflect the priorities and strategies enunciated in the reports and plans described above. For instance, the need for Section 504 housing was identified in CIHA housing plans and project lists dating back to 2008.

Strategies for assessing existing properties and developing Section 504 remodel/rehabilitation plans have been underway for the last 11 years. The goal of constructing 3 new Section 504 housing units is included in the FY 2020 IHP. Finally, the development of additional housing and rehabilitation of existing housing to address overcrowding, improve accessibility and accommodations for individuals with disabilities, and assist elders with the ability to age-in-place are all supportive of goals, priorities, and objectives enunciated in CIHA FY 2018-2022 Strategic Plan, the Coquille Indian Tribe's Updated Strategic Plan (2018), and the Empire Comprehensive Plan.

5.2 Outputs and Outcomes: The outputs and outcomes associated with this project are reflected in the CIHA's Indian Housing Plan for FY2020 and include:

- Number of housing new units constructed (3)
- Number of housing units rehabilitated (3)
- Number of Section 504 compliant housing units added (6)
- Number of new affordable housing units added to inventory (3).
- Number of AI/AN families added to Kilkich community (6).

Similarly, the outcomes identified in the CIHA's Indian Housing Plan for FY2020 include:

- *For Construction of 3 New Units* – The identified outcome in the Indian Housing Plan is “create new affordable rental units”
- *For Rehabilitation of 3 Existing Units* – The identified outcome in the Indian Housing Plan is “Provide accessibility for elderly/disabled persons.”
- *Additional Outcomes* – In addition to the identified outcomes from the Indian Housing Plan, this project directly addresses the following outcomes:
 - Reduction in overcrowding.

- Reduction in number of families living in substandard housing.
- Increase in number of units that are accessible and accommodate persons with disabilities.
- Improved energy efficiency.

OTHER FACTORS

Opportunity Zone: The Kilkich community is located in its entirety in census tract 41011000504, which is listed as a Qualified Opportunity Zone on the U.S. Department of Treasury's website: <https://www.cdfifund.gov/Pages/Opportunity-Zones.aspx>. As all proposed work will take place within the Kilkich Community, CIHA certifies that this project meets the requirements of the IHBG – Competitive Grant program to receive preference points associated with investment in Qualified Opportunity Zones.