Spokane County Action Plan

APPROVED BY HUD

September 25, 2025

COMMUNITY DEVELOPMENT BLOCK GRANT - DISASTER RECOVERY (CDBG-DR) FUNDS

Spokane County Action Plan for Community Development Block Grant – Disaster Recovery (CDBG-DR) Funds

2023 Severe Wildfire Event

FEMA – 4759 – DR

Declared February 15, 2024

HUD Press Release #25-004 Federal Register Notice: 6512-N-01

Record of Amendments

Date Action Plan was Approved by HUD
September 25th, 2025

Version (Date)	Summary of Changes Made
Version 1 (July 22, 2025)	**Action Plan to be Approved by HUD.**
Version 2 (March 12, 2026)	**Substantial Amendment focused on program redesign. The restructuring consolidates each program type into more general categories. The Housing program has been extensively rewritten to adjust for HUD-defined construction vs reconstruction. Additional clarifications and edits throughout the document better align with HCD's aim for recovery efforts.**
Version 3 (October 8, 2026)	**Substantial Amendment providing clarification on pre- and post-award eligible expenses, increasing the AMI limits for all programs from 120% to 150%, renaming the housing program for homeowners, and removal of the multi-family housing program. This process included significant budget revisions to boost Housing Recovery programming and provide additional edits and explanations throughout the document.**

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Executive Summary

Overview

The U.S. Department of Housing and Urban Development (HUD) announced that Spokane County will receive $44,152,000 in funding to support long-term recovery efforts following the 2023 Oregon Rd and Gray Rd Wildfires event DR-4759-WA through the Housing and Community Development (HCD) Department. Community Development Block Grant-Disaster Recovery (CDBG-DR) funding is designed to address needs that remain after all other assistance has been exhausted. This plan details how funds will be used to address remaining unmet needs in Spokane County with a particular focus on the Medical Lake and Elk jurisdictions which were impacted the greatest by the disaster.

To meet disaster recovery needs, the appropriations act(s) making CDBG-DR funds available have imposed additional requirements and authorized HUD to modify the rules that apply to the annual CDBG program to enhance flexibility and facilitate a quicker recovery. HUD has allocated $44,152,000 in CDBG-DR funds to Spokane County in response to the 2023 Oregon Rd and Gray Rd Wildfires event DR-4759-WA, through the Allocation Announcement Notice published in the Federal Register at Docket No. FR-6512-N-01. This allocation was made available through the 2025 Appropriations Acts (Public Law 118-158).

Spokane County's HCD Department is the lead and responsible agency for administering CDBG-DR funds allocated to the county through this award. The following Action Plan describes HCD's determination of the remaining unmet needs due to the disaster and the approach to distribute funds to address long-term recovery. Spokane County is committed to directing CDBG-DR funds to the benefit of low- and moderate-income households and areas in accordance with Section 103 of the Housing and Community Development Act. HCD will utilize various methods to deploy these resources in a timely manner to streamline the recovery process.

Disaster-Specific Overview

On a blistering summer day, fueled by relentless winds, the Gray and Oregon Fires blazed across 23,000 acres of dry forests, grass and shrub lands, and residential areas. These fires, erupting just 41 miles apart in Spokane County, Washington, resulted in the destruction of 366 primary homes and a total of 710 structures. Resources were spread thin as four large fires began within 24 hours of each other.

On August 18th, 2023, the Gray Fire originated in the Medical Lake community, nestled amidst wheat fields, ponderosa pine forests, and a densely populated Wildland Urban Interface (WUI). Conversely, the Oregon Fire began further northeast in the Elk community; a rural enclave, dotted with scattered homes, hemmed in by industrial forestland to the north and east. While distinct in their fuel sources and surroundings, both blazes yielded similar outcomes—widespread devastation.

Evacuations occurred quickly and rapidly with more than 2,500 residents of Medical Lake and Four Lakes placed under a Level 3 evacuation meaning to leave immediately due to imminent danger. More than 8,000 people were evacuated under Level 3 evacuation from the community of Elk. A synchronized effort, marked by swift evacuations, undoubtedly saved countless lives. However, amid the coordinated efforts, tragedy struck with the loss of two civilians during the first hours of the fire.

On October 4th, 2023, Governor Jay Inslee requested federal aid as various governmental agencies and community organizations evaluated the damage, planning both current and future rebuilding efforts. On February 15th, 2024, President Biden declared that a major disaster had occurred in Spokane County. This declaration made Individual Assistance available along with other financial resources at the federal level.

Figure 1: Gray and Oregon Fires Scope of Disaster in Spokane County

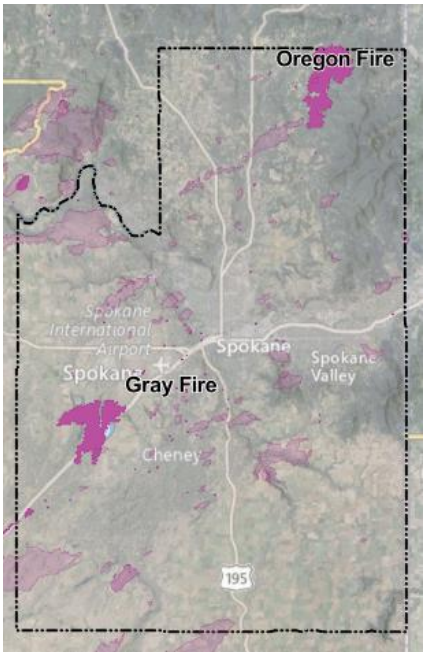

Figure 2: Burnt Property in the Elk Area

Figure 3: Homes Destroyed on the West Shore of Silver Lake

Most Impacted and Distressed Areas

HUD identified MID Areas

Through the allocation process, HUD identified the Most Impacted and Distressed (MID) areas where CDBG-DR funding must be spent. For this grant award, HUD identified Spokane County in its entirety as the MID area. All funded projects and activities must be located within Spokane County, Washington. All CDBG-DR allocations will be available for disbursement from the Federal Treasury for approximately six years following the date of execution of the grant agreement with HUD.

The County is required to spend at least 80% of all CDBG-DR funds to benefit HUD-identified MID areas. Because Spokane County is the designated MID area, HCD will spend 100% of its allocation within the county. Spokane County is also required to spend a minimum of 70% of their funds on LMI beneficiaries and 15% of their unmet needs on CDBG-DR Mitigation Set-Aside activities.

Budget allocations are based on the best data currently available and reflect the Needs Assessment described in this Action Plan. Future amendments will include specific programming that will occur in each budget category and may even change the amount allocated; however, neither public services, planning, nor administrative expenses will exceed their statutory caps. HUD statutory caps for CDBG-DR are as follows:

- 15% for Public Services
- 15% for Planning
- 5% for Administration

Grantee-identified MID Areas

The grantee, Spokane County, agrees with the MID area determination from HUD that identifies Spokane County in its entirety. Therefore, no allocation of the awarded amount will be used outside of Spokane County. It should be noted, however, that while the MID area will be the county, HCD recognizes and will prioritize the Medical Lake and Elk communities which were directly impacted by the disaster and therefore the most distressed.

Overview of the Impacts of the Qualifying Disaster

The HCD Department compiled data from various agencies and organizations to create an unmet needs assessment to identify the impact and remaining long-term needs of the communities. Spokane County has assessed the data provided and the estimated impacts of the disaster to best identify the greatest recovery needs that have not been addressed. Housing was particularly established as the highest need and priority during our analysis. Many low to moderate-income households still lack the necessary resources to repair or replace their lost homes.

Spokane County recognizes that there are still significant amounts of unreported infrastructural unmet need. HCD has determined the allocation into infrastructure will reflect the amount reported in the

unmet needs assessment. However, HCD will allocate more resources into the mitigation category regarding infrastructure as it gets reported.

HCD believes that economic revitalization is over-inflated in the unmet need assessment and believes there is strong evidence and community support for resources better spent towards public services and mitigation. These figures are estimated allocations and subject to change. Reasoning for these programs is best justified in the funding criteria for each program category.

Natural hazard mitigation facilitates long-term recovery and greatly prepares communities from future disasters. Investments into resilient infrastructure and housing methodologies are recognized as a cost-effective means of reducing future disaster impacts. HCD will dedicate a significant portion of its allocation to the mitigation category as the preparation and prevention of another disaster as well as mitigating the effects of the Oregon and Gray Road Fires was identified as a top priority.

Table 1: Disaster Overview

Disaster Summary	
Qualifying Disaster:	4759
HUD-identified MID Areas:	Spokane County
Grantee-Identified MID Areas:	Spokane County, Medical Lake and Elk Priority

Table 2: CDBG-DR Allocation Overview

CDBG-DR Allocation Overview:	
CDBG-DR Allocation:	$38,393,000.00
CDBG-DR Mitigation Set Aside:	$5,759,000.00
Total Allocation:	$44,152,000.00

Unmet Needs and Mitigation Needs Summary

Table 3: Unmet Needs and Proposed Allocations

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation	Estimated % to CDBG-DR Mitigation Set-aside	Estimated % to HUD identified MID Areas	Estimated % to LMI
Administration	$2,207,600	5%			
Planning	$~~2,207,600~~1,000,000	~~5~~2%	0%		
Housing	$~~22,076,000~~27,789,440	~~50~~63%	5%	100%	70%
Infrastructure	$3,532,160	8%	20%	100%	70%

Economic Revitalization	$~~2,207,600~~1,000,000	~~52~~%	0%	100%	70%
Public Service	$~~5,298,240~~2,000,000	~~125~~%	0%	100%	70%
Exempt Public Service	$0	0%	0%	100%	70%
CDBG-DR Mitigation Set-Aside	$6,622,800	15%	75%	100%	70%
Total	$44,152,000	100%	100%	100%	70%
% of Total	100%	100%	100%	100%	70%

Unmet Needs Assessment

Evaluating the Impacts of the Disaster

The following section describes the impacts, direct or indirect, of the qualifying disaster and provides a foundation for recovery efforts via HUD-prescribed eligible activities. CDBG-DR funding is intended to address the remaining unmet need where it exists. As such, HCD must conduct a needs assessment based upon the best available data to determine the basis by which the County must allocate its CDBG-DR award. HUD requires this assessment to evaluate the three core aspects of recovery – housing, infrastructure, and the economy. Spokane County must also account for assistance which has already been provided by various sources, including but not limited to, federal, state, and local resources (e.g., the Federal Emergency Management Agency [FEMA], Small Business Association [SBA], the Salvation Army [TSA], Spokane ~~Region~~Regional Long~~-~~Term Recovery Group [LTRG], local funds provided through Spokane County Emergency Management, and private sources such as insurance). The unmet needs assessment shall follow HUD's prescribed format and organizational structure.

New data will become available throughout the lifespan of the awarded funding which will be reflected in future amendments to this section. HCD values the importance of feedback from the communities directly impacted from the disaster and will include any public comments in preparation of this assessment.

Housing

Following a disaster declaration, significant focus is placed on determining the assessed damage to better inform the federal assistance programs that will be made available for impacted communities. Utilizing these resources provided by departments such as FEMA and SBA, Spokane County will divide the data available into two categories as it relates to the Elk and Medical Lake communities. This information is critical for determining the best allocation for this award by HUD as it will detail the verified losses, assistance to date, and remaining unmet need.

Spokane County performed a comparative analysis of the two communities and their respective applications received by FEMA and SBA. The following tables in each category will detail demographic information of the communities and the impacts from both the Oregon and Gray Road Fires as it relates to housing.

Emergency Shelters, Interim, and Permanent Housing

After careful consideration of the best data available, HCD can confidently confirm that no emergency shelters, interim, and permanent housing were affected by the disaster. None of the housing types described were located in the Medical Lake or Elk communities. Additionally, the

Point-In-Time Count or PIT, which provides an annual snapshot of homelessness in Spokane County, saw no significant increase directly following the wildfires.

Year	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
2024	1280	270	443	1993

2024 Point-In-Time Count WA-502 Spokane City & County CoC (2025 figures not available at time of writing)

Additionally, Spokane County regularly engages with the Spokane Regional Continuum of Care (COC) as a member of its executive committee. This relationship has allowed Spokane County the ability to review and provide input regarding COC-funded programs. The region's Coordinated Entry system (a method of collecting participant information and referring to the most appropriate resource) will refer individuals presenting as impacted by the disaster to CDBG-DR funded programs whenever applicable. Areas that were the most impacted by this disaster and are anticipated to have unique service provision needs, separate than that of providers located in more urban areas of Spokane County.

Rental and Owner-Occupied Single Family and Multifamily Housing

The following tables reveal information on residents in the Elk and Medical Lake areas through various categories determined during the FEMA intake process. A majority of the housing unmet need is determined through best available data presented below.

Table 4: Demographic Information of FEMA Applicants

Disaster Region	# of Household Participants	# of Household Members	# of Household Members Under 5	# of Household Members Over 65
Elk	194	493	22	86
Medical Lake	306	713	23	155

Table 5: Owner/Tenant Breakdown with FEMA Determined Dwelling Status

Disaster Region	% of Homeowners	% of Renters	Dwellings Destroyed	Dwelling Partially Damaged
Elk	82%	18%	104	12
Medical Lake	81%	19%	94	13

Table 6: Income and Insurance According to FEMA

Disaster Region	Median Gross Income	# of Households w/Homeowners Insurance	# of Households w/Mobile Home Insurance	# of Households w/o Real/Personal Property Insurance
Elk	$42,000	67	24	90
Medical Lake	$75,000	197	25	65

Table 7: Residence Type for Owners and Tenants According to FEMA

Disaster Region	Apartment	House – Single/Duplex	Mobile Home	Travel Trailer	Other
Elk – Owners	0	89	55	11	6
Elk – Renters	2	14	12	5	0
Medical Lake – Owners	0	192	28	8	20
Medical Lake – Renters	2	35	14	3	3

Table 8: FEMA Assessed Damage for Owners/Renters and Assistance Provided

Disaster Region	Personal Property Loss	Real Property Loss	FEMA Assistance for Personal Property	FEMA Assistance for Housing Repair	FEMA Assistance for Housing Replacement
Elk – Owners	$1,035,466.07	$12,999,017.07	$296,019.82	$217,712.85	$1,655,548.86
Elk – Renters	$207,462.52	$132,780.88	$143,256.48	$0	$0
Medical Lake – Owners	$444,176.27	$10,991,376.89	$51,743.23	$559,938.77	$242,471.93
Medical Lake – Renters	$232,110.43	$0	$95,847.01	$0	$0
Total Loss:		$26,042,390.13	**Total Assistance Provided:**		$3,262,538.95

Table 9: Unmet Need Calculation Per FEMA Data (Primary Residence Calculation)

Unmet Need	
FEMA Reported Total Losses	$26,042,390.13
FEMA Approved Assistance	$3,262,538.95
Total Housing Unmet Need:	**$22,779,851.18**

The unmet need identified above accounts for FEMA's estimate of primary structures that were destroyed or partially destroyed. As such, the figure does not include any secondary structures such as outbuildings, workshops, garages, barns, etc. Any automobiles or farm equipment were

likely not included in this estimate as it is not related to housing. For identifying the housing unmet need, FEMA data was chosen as the best example for remaining primary residences needing repaired or replaced. Additional data will be gathered through methods including but not limited to, procuring an outreach provider whose objective will be to identify the current, remaining unmet need for impacted households. HCD, utilizing this provided data, will facilitate the allocation of resources to address said needs through subsequent amendments.

It is the intent of Spokane County to provide multiple housing options for survivors of the disaster to address the unmet need. The data provided in the tables above show a distinct need for various types of housing from stick-built to mobile homes. A variety of options will allow survivors the ability to recover, especially in ways that best fit their financial situation. Additionally, a multi-family housing option should be considered for those impacted and rented at the time of the disaster. Spokane County considers housing as the highest unmet need and top recovery priority due to the significant cost of damages.

Public Housing (Including HUD-assisted Housing) and Other Affordable Housing

Spokane County contacted the Spokane Housing Authority (SHA) to determine if any units were damaged or adversely impacted because of the disaster. Spokane County can confidently confirm that no public housing, affordable housing units, assisted housing, or multi-family housing units were in the disaster areas.

The SHA no longer owns or operates public housing, however, they stated that they have made changes in their Administrative Plan to prioritize survivors any presidentially declared disasters, such as the Oregon and Gray Road Fires, as part of their housing choice voucher program. Additional information regarding programs offered by the Spokane Housing Authority can be found by visiting their website at: https://www.spokanehousing.org/, or by calling 509-328-2953.

Regarding floodplain criteria for all survivors of the disaster, approximately two households in the Elk region were reported in a floodplain. The damage reported for those individuals amounted to $45,043.62 whereas the amount provided in assistance was $44,458.92. This amount covered one of the individual's unmet need and leaves $584.709 remaining for the other's unmet need.

Shortly after the disaster, SBA provided various Disaster Home Loan Applications to assist survivors in recovery efforts. SBA made affordable loans, with most of them at 2.5% interest rates, available to homeowners for household repairs. This amounted to $11,373,758.65 of loans currently provided.

SBA's verified loss process includes a comprehensive assessment of structural and real property losses, and the costs needed to fully repair the home, whereas FEMA's verified loss assessment

is limited to the costs to make the home habitable. SBA estimates that $82,212,454.30 of Real and Personal Property damage is included in the total verified loss assessment. This figure resembles the County's estimate of all damage resulting from the disaster.

Because HCD cannot verify whether the home loans are being used for habitability repairs or whether they are directly tied to the primary residence, the loans are not included in the unmet need calculation. This section, including the unmet housing need, will be amended as more data regarding insurance and loan tiebacks become available.

Post-Disaster Site Conditions

Many households still have wildfire debris including but not limited to hazardous waste and structural remnants from affected properties. Spokane County Emergency Management received multiple grants to perform asbestos testing which amounted to approximately $229,615.53 being reimbursed for homeowners. Unfortunately, many charred structures are still present on the properties impacted and many households need help removing the debris. Some homeowners have left the state entirely, requiring intervention to clear the rubble as to prevent hazardous materials leaching into the ground.

Through a combination of erosion and heavy industrial equipment used for cleanup, driveways and site conditions for private property owners have been erroneously impacted. The disaster also ripped through any fencing that homeowners had on their property protecting their livestock and perimeters. These fences may cover anywhere between 5-10 acres per site. Additionally, water access such as wells or filtration systems were damaged and are in dire need of repairs or replacement. This information was captured in the analysis below provided by The Salvation Army.

Table 10: The Salvation Army's Proposed Site Needs

Proposed Activity	Estimated # of Households in Elk	Estimated # of Households in Medical Lake	Estimated Project Cost
Debris Clean Up	15	10	$2,000,000
Driveways	10	10	$300,000
Fencing	10	10	$300,000
Water Access	25	5	$1,200,000

Due to the likelihood of all these recovery components occurring on a case-by-case basis with private property owners in the process of rebuilding, Spokane County will utilize a variety of housing ~~reconstruction/rehabilitation~~ programs to target and initiate recovery activities which improve site conditions simultaneously as they are eligible project costs.

Infrastructure

Spokane County identified various impacts on local infrastructure from the Oregon and Gray Road Fires. With the disaster spanning more than 23,000 acres, the vast amount of damage is difficult to ascertain an accurate dollar amount. Spokane County performed outreach to local utility providers, consultation with the public, and had internal conversations within various departments to assist in determining the unmet need, along with an accurate starting allocation, for infrastructure activities.

Figure 4: A Local Road with Significant Damage

Shortly following the disaster, a combination of clean-up crews with heavy equipment and soil erosion resulted in public-right-of-way, culverts, and curb cuts to be significantly damaged. Households have expressed a need for restoration of public roadways and improved drainage. The public also noted that gravel roads need resurfacing while multiple potholes on both paved and unpaved roads have greatly increased.

Consultation efforts with local utility providers such as Avista or Inland Power found that many of the telephone poles and/or transformers that were damaged or destroyed have been replaced.

Similarly, the County's Public Works Department has undergone the process of identifying and replacing any damage to roads and guardrails resulting from the disaster. Any planned roads needing repair or replacement will be categorized under mitigation as they would tie towards preparation for another disaster. Spokane County can combine and utilize both mitigation and infrastructure allocations for larger activities requiring significant investments.

Internal conversations with the Spokane County Public Works Department have determined that there is a minimum of three (3) miles worth of roads needing repair/replacement to occur within these communities. This investment is approximately $1,330,00 per centerline mile. The HCD Department will set aside infrastructure funds matching this unmet need, but notes that this set-aside is not explicitly for the use of roads. Spokane County believes the current unmet need for infrastructure activities includes but is not limited to roads, utilities, and public facilities.

Many infrastructure projects are yet to be determined and the budget for such activities may change after housing programming is completed and damage assessments are ascertained. Additional details may be added to this section through future amendments as more information becomes available.

For more information on Spokane County's planned infrastructure projects in the Medical Lake and Elk areas, we encourage you to look at the Long-Range Planning efforts the County has identified in its Capital Facilities Plan | Spokane County, WA and the 2017-2037 Comprehensive Plan | Spokane County, WA which is currently being amended. The Comprehensive Plan also includes information on the Growth Management Act and references to the County's Capital Improvement Plan.

Economic Revitalization

Any disaster will have an effect on the local economy and the wildfires were no exception. Many of the survivors had businesses on their property or swaths of farmland that were destroyed. Some individuals who lost their home went into debt in order to recover their loss while others left the state entirely, presumably leaving their jobs too. The impact varied from person to person.

The Small Business Administration (SBA) offered Economic Injury Disaster Loans (EIDL) and Business Disaster Loans to repair or replace disaster-damaged property owned by the business, including real estate, inventories, supplies, machinery, equipment, and working capital, until normal operations resume. Businesses of all sizes are eligible. Private, nonprofit organizations, such as public service, faith-based, and private universities, are also eligible. The law limits business loans to $2 million and the amount cannot exceed the verified uninsured disaster loss.

Approximately 53 SBA Disaster Business Loan Applications were submitted reporting a total verified loss of $17,549,887.71. It should be noted that the Silver Lake Bible Camp, located on the west shore of Silver Lake in the Medical Lake region, reported the greatest amount of loss due to the impact of the fires and made up most of the loan applications. For all approved SBA loans regarding businesses, $4,366.67 was provided as EIDL, while $1,028,200.00 was provided through multiple 4% interest loans. This means there is still a substantial gap businesses face before they can fully recover from the disaster.

Table 11: Businesses that Applied for Disaster Assistance Through SBA

Disaster Region	# of Business Loan Applications	Median Verified Loss	Total Verified Loss	Total Approved Loan Amount	Remaining Unmet Need
Elk	3	$275,352.00	$760,242.70	$378,200.00	$382,042.70
Medical Lake	50	$150,679.04	$16,789,645.01	$650,000.00	$16,139,645.01
Total:	53		$17,549,887.71	$1,028,200.00	**$16,521,687.71**

A proposed activity from the community was the replacement of outbuildings or secondary structures lost in the disaster. These buildings may have been vital storage areas for farm equipment and/or workspaces for such businesses not located in the primary residence. Should secondary structures be eligible as it ties to a business, HCD may amend this section with estimated figures of the unmet need.

Public Service

In the wake of the disaster, Spokane County Emergency Management contracted with The Salvation Army (TSA) to provide case management services for survivors to provide resources and triage recovery needs. TSA has identified various needs such as trauma counseling, peer support, therapy facilities, and recovery tools that would be needed to assist the affected residents. Dedicating full-time and part-time staff for any case management project would require an estimated $410,000.00 annually to provide support for 31 individuals: 25 from Elk and 6 from Medical Lake.

During our Community Engagement sessions, Spokane County identified a need for legal services, code enforcement, and mortgage/rental assistance. As the scope of these projects vary greatly and are likely to be on a case-by-case basis, HCD will opt to follow the community's recommendation for public service budget allocations and enlist subcontractors to perform these services. Those bids with their respective estimates will be used to amend the plan at such a time that the unmet need will be evaluated and budgeted.

Community Input

Spokane County held two separate community engagement series, one in Elk and one in Medical Lake, to solicit input and information on best utilization of these funds. HCD asked the communities what the highest needs and priorities from the HUD-defined categories are. These events offered an opportunity for feedback through a question-and-answer session as well as a survey from which the results can be found below.

Table 12: Community Ranked Priorities for CDBG-DR Funds

Housing	Infrastructure	Mitigation	Economic Revitalization	Public Services
24%	24%	19%	17%	16%

Table 13: Community Proposed Budget Allocations

Funding Categories	0-20%	20-40%	40-60%	60-80%	80-100%
Housing	28.6%	26.5%	20.4%	11.6%	12.9%
Infrastructure	22.9%	42.7%	12.1%	11.5%	10.8%
Mitigation	39.2%	32%	15%	8.5%	5.2%
Economic Revitalization	53.2%	29.8%	12.8%	3.5%	0.7%
Public Services	56.6%	28%	9.8%	3.5%	2.1%

From the information provided in the survey, housing and infrastructure were identified as the highest need and best allocation of funds followed closely by mitigation. Using the data provided by the community and cross-referencing the data provided through sources such as FEMA and SBA, Spokane County HCD created a budget to reflect best investment and utilization of funds with the information available.

The survey, which had 168 participants, also asked for rankings of specific types of projects in each category and has been the basis for some funding allocations.

Figure 5: Community Engagement Series – Housing Rankings

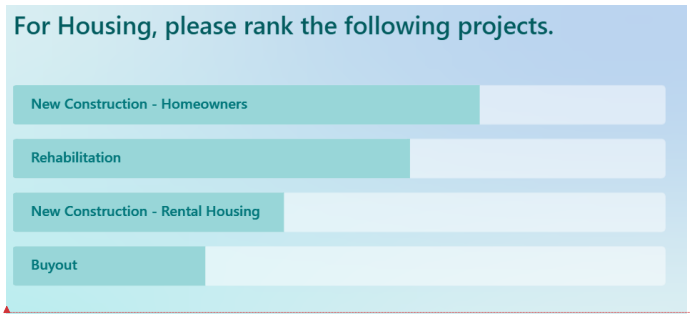

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Figure 6: Community Engagement Series – Infrastructure Rankings

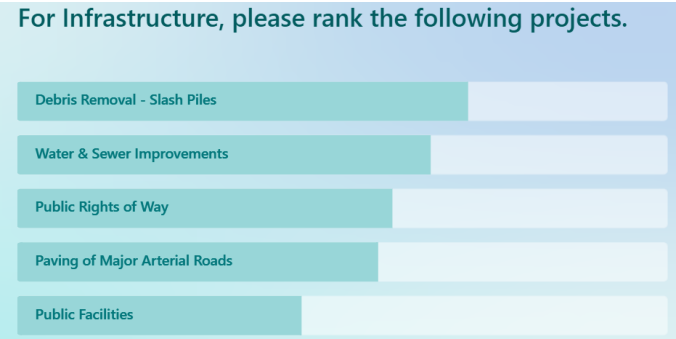


Figure 7: Community Engagement Series – Economic Revitalization Rankings

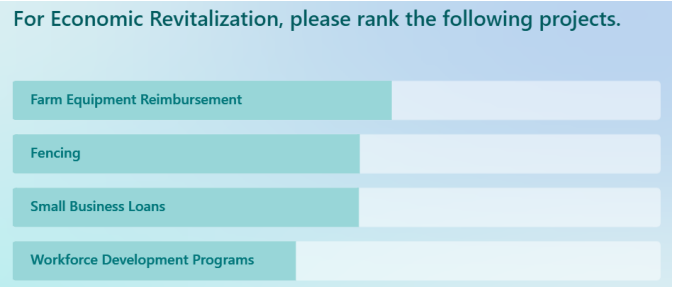
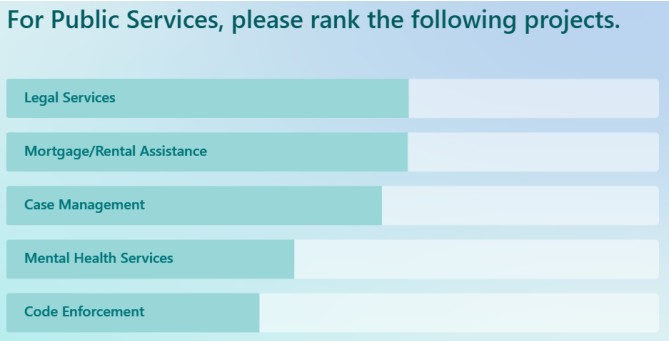


Figure 8: Community Engagement Series – Public Services Rankings



Summary of Unmet Needs

Table 14: Quantified Disaster Impacts and exacerbated Pre-Existing needs of Housing, Infrastructure, and Economic Development, Other Financial Assistance, and Remaining Unmet Need

Cost Categories	A Direct and Indirect Need	B Financial Assistance Budgeted and Obligated	A-B Unmet Need
Emergency Shelters, Interim, and Permanent Housing	$0	$0	$0
Rental Housing	$572,353.83	$239,103.49	$333,250.34
Owner-Occupied Housing	$25,470,036.30	$3,023,435.46	$22,446,600.84
Public Housing and Other Affordable Housing	$0	$0	$0
Infrastructure	$3,990,000.00	$0	$3,990,000.00
Economic Development	$17,549,887.71	$1,028,200.00	$16,521,687.71
Public Service	$410,000.00	$0	$410,000.00
Total	**$47,992,277.84**	**$4,290,738.95**	**$43,7011,538.89**

Mitigation Needs Assessment

The Mitigation Needs Assessment is a risk-based assessment that identifies current/future threats and natural hazards in the HUD-designated MID area. This assessment will inform the best use of CDBG-DR funds and allocation of resources toward cost-effective solutions to mitigate hazards and lessen their impact. While CDBG-DR funding is designed to support long-term recovery from the specific disaster event, HUD also asks grantees to assess their vulnerability to all natural disasters and utilize a portion of the CDBG-DR funds to plan for and mitigate against future damages.

The Spokane County Comprehensive Emergency Management Plan (CEMP) is intended as a comprehensive framework for local mitigation, preparedness, response, and recovery activities, establishing an all-hazards approach to enhance the County's ability to manage emergencies and disasters. Its purpose is to save lives; protect public health, safety, property, and the environment; sustain the local economy; support resilience; and guide an effective recovery for the Whole Community of Spokane County.

Spokane County Emergency Management coordinated with other County Departments, response partners, volunteer organizations, and appropriate subject matter experts to identify, develop, maintain, and enhance local emergency management capabilities. The CEMP is formatted in accordance with FEMA's Comprehensive Preparedness Guide (CPG) 101 (version 2.0/November 2010) and is consistent with the National Response Framework (NRF). A copy of the CEMP can be found here: Spokane-County-CEMP-March_2021 or on the Disaster Recovery Website.

Spokane County conducts a Hazard Identification and Vulnerability Assessment (HIVA) on a regular basis as part of the maintenance of the County's Natural Hazard Mitigation Plan. In addition to the HIVA, a Threat and Hazard Identification and Risk Assessment (THIRA) is also conducted. These separately published documents are the primary sources for information on Spokane County's hazard exposures.

Also included for consideration are historical weather data, local/national/global event data, and existing specific incident plans and procedures. Threat and hazard identification is critical because it allows Spokane County to focus preparedness efforts on the events and incident types most likely to occur, or to be the most severe. The following illustrates the identified threats and hazards perceived to be a top priority for Spokane County.

Natural Hazards

1. Severe Weather
    a. High Winds
    b. Snow / Ice Storms
    c. Heavy Rain / Thunderstorms

    d. Flood
    e. Excessive Heat / Drought
2. Wildland Fire
3. Dam Failure
4. Earthquake
5. Public Health Emergencies

Spokane County maintains a FEMA-approved Natural Hazards Mitigation Plan (HMP) which addresses the County's known potential hazards and provides strategies for mitigation actions intended to improve resilience. The Plan is a multi-jurisdiction plan with fifteen (15) signatory agencies and municipalities, in addition to Spokane County and can be found here: Mitigation Plan | Spokane County, WA.

Spokane County Emergency Management is in the process of updating the Community Wildfire Protection Plan (CWPP) which is part of the greater HMP. The Mitigation Plan looks at all hazards and requires the identification of various strategies and projects to mitigate potential impacts within the county. Public engagement for the CWPP occurred in March 2025.

Table 15: CDBG-DR Mitigation Set-Aside Needs Assessment

CDBG-DR Mitigation Set-Aside Needs Assessment:			
Categories Affected	A Total Need	B Financial Assistance Budgeted and Obligated	A-B Unmet Need
Housing	$0	$0	$0
Infrastructure	$3,800,000	$0	$3,800,000
Economic Development	$0	$0	$0
Total	**$3,800,000**	**$0**	**$3,800,000**

Connection of Proposed Programs and Projects to Unmet Needs and Mitigation Needs.

As part of TSA's case management process, various mitigation measures were identified to reduce fire risk and restore land stability. Public comments supported many of the recommended activities as dead trees litter various properties of the impacted households and visible soil erosion has occurred. The following table is an outline of the proposed projects with associated dollar amounts.

Table 16: The Salvation Army's Proposed Mitigation Needs

Proposed Mitigation Activity	Estimated # of Households in Elk	Estimated # of Households in Medical Lake	Estimated Project Cost
Tree Removal	30	20	$1,500,000.00
Slash Pile Cleanup	15	12	$300,000.00
Replanting	20	20	$2,000,000.00

Considering all identified hazard risks, severe weather and wildland fire are at a higher likelihood because of the Oregon and Gray Road Fires. Reducing the impacts of future disasters will need to account for the unmet need and enhanced mitigation measures.

The following section will describe proposed mitigation projects that don't necessarily apply to the HUD-defined unmet need. **These proposed projects will be weighed with the actual unmet need to determine if any disproportionate allocation of resources would occur. Additionally, eligibility criteria in accordance with HUD's requirements would need to be consulted before any investment in the proposed projects occurred. The projects below are included per the requirements of HCD's Citizen Participation Plan, and while each item may be explored for feasibility or best recovery practices, no funding guarantees are being made for these proposed projects. Please see HCD's Quarterly Performance Reports in the Planning Documents section for more information about active awards.**

- Infrastructure activities such as, but not limited to, water/sewer implementation and road paving for evacuation routes are determined as projects that would mitigate future disaster and limit potential hazard risks. The disaster itself did not destroy such infrastructure requiring financial assistance for repairs or replacement due to the absence of such infrastructure. Therefore, the following items are not an unmet need by HUD's definition, but rather proposed mitigation measures justifiable in that additional preparation would enhance the public's health and safety. ~~**These proposed projects will be weighed with the actual unmet need to determine if any disproportionate allocation of resources would occur.**~~

The City of Medical Lake proposes $15.2 million from the CDBG-DR award for water/sewer infrastructure, specifically on the west shore of Silver Lake. This project would provide easy access to approximately 70 new fire hydrants that were unavailable at the time of the disaster. Additional paving due to the new utilities would also improve emergency vehicle access and evacuation routes. ~~Eligibility criteria in accordance with HUD's requirements would need to be consulted for any investment in the proposed project.~~

- Furthermore, the City of Medical Lake has proposed additional infrastructure upgrades in Waterfront Park to handle temporary housing for disaster-displaced families, a community center, and an RV park with 22 sites. The City's engineer also identified vital intersections where

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implementing roundabouts would assist evacuations for civilians and expedite emergency vehicle access during a disaster event.

- Consultation with the Spokane Public Works Department examined local arterial roads with a high traffic count in the disaster areas that may need paving or reconstruction for planned evacuation routes. Public Works identified six arterial roads for consideration, three in each disaster region. Should there be interest in this area, HCD will expand upon this section in subsequent amendments to the Action Plan.
- Through public engagement, concern for pine beetle infestation was discussed as a potential hazard. Pine beetles are known to spread at a rapid pace and kill swaths of forests creating the conditions for a hot, fast-moving wildfire. If allocated funding, HCD would examine the scope of the infestation and cost for remediation.
- The public has also expressed concern with debris infiltrating into Silver Lake, potentially leeching pollutants, and has asked for an examination into determining whether a water cleanup initiative could be an eligible activity with these funds. Subsequent amendments to this section may occur.
- Beyond infrastructure mitigation measures, HCD will consider housing mitigation for any new construction or rehabilitation efforts including but not limited to fire-resistant materials such as non-combustible siding or metal roofs.

To minimize the displacement of persons and other entities that may be affected by the activities outlined in this Action Plan, Spokane County and its subrecipients will coordinate with applicable agencies and entities to ensure that all programs are administered in accordance with the Uniform Relocation Assistance and Real Property Acquisition Act (URA) of 1970, as amended (49 CFR Part 24) and Section 104(d) of the Housing and Community Development Act of 1974, as amended, and implementing regulations at 24 CFR Part 570.496(a).

It should be noted that for the proposed program allocations in the table below, HCD attempted to match the percentage of the federal award to the percentage of the unmet need. However, there are categories where this instance is not reflected such as Economic Revitalization and Public Services. Because SBA loans were not granted to many of the initial applicants following the disaster, HCD believes the Economic Revitalization unmet need is over-inflated. As such, substantial investment into that category does not seem necessary at this time but is subject to change should new data indicate otherwise. HCD maintains that housing recovery efforts are the greatest need in the communities impacted and will prioritize funding allocations for renters and homeowners before exploring other programming possibilities. This determination is a result of stakeholder feedback. Once satisfied, HCD may modify the allocation amount for economic revitalization with remaining funds through future amendments. Additionally, due to the lack of data for Public Service unmet need, HCD has utilized a substantial number of resources for outreach and service navigation to directly connect with, and assist,

survivors of the disaster in identifying their remaining unmet needs which will be used to identify potential investments through future amendments.

Table 17: CDBG-DR Program Allocation and Funding Thresholds*

Eligible Cost Category	Unmet Need	% of Unmet Need	% of Funding to be Expended in HUD Identified MID	CDBG-DR Allocation Amount	% of CDBG-DR Allocation (Excluding the 15% Mitigation Set-Aside)
Administration (5% cap)				$2,207,600	5%
Planning (15% cap)			100%	$~~2,207,600~~1,000,000	~~5~~2%
Rental Housing (New Construction)	$333,250.34	1%	100%	$~~2,472,512~~0	~~6~~0%
Owner-Occupied Housing (~~Reconstruction/ Rehabilitation~~Single-Family Housing Recovery)	$22,446,600.84	51%	100%	$~~19,603,408~~27,789440	~~44~~63%
Infrastructure	$3,990,000	9%	100%	$3,532,160	8%
Economic Revitalization	$16,521,687.71	38%	100%	$~~2,207,600~~1,000,000	~~5~~2%
Public Service (15% cap)	$410,000	1%	100%	$~~5,298,240~~2,000,000	~~12~~5%
Exempt Public Service (no cap)	$0	0%	100%	$0	0%
Total	$43,701,538.89	100%	100%	$37,529,200	85%

Funds that have not been allocated:	$6,622,800	15%

*It should be noted that the program allocations in the table above represent the best data available and may be subject to change, reallocating funds to different categories through future amendments if necessary. Should a program, and its subsequent activities, have unspent funds remaining with no other planned programming, an amendment to redistribute those funds to other categories will occur.

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Allocation and Award Caps

Spokane County HCD is the lead agency and responsible entity for administering this grant allocation for disaster recovery and completing all subsequent environmental reviews per 24 CFR 58.4. As detailed throughout this document, Spokane County consulted various parties to ensure the planned uses of funds are responsive to identified needs and consistent with other recovery efforts.

The CDBG-DR grant is subject to various spending thresholds and caps as described below. In compliance with 24CFR570.200(a)(3)(c), thresholds for costs associated with administration and planning are calculated from the total allocation of CDBG-DR funding, while thresholds for compliance with the primary national objective for benefiting low- and moderate-income persons is calculated from what this Action Plan will call the "Program Budget" after administration and planning have been removed from the calculation.

- Funding must benefit the HUD-identified MID area, which includes all of Spokane County.
- At least **$24,725,120.00** (70% of the Program Budget) must benefit low- and moderate-income (LMI) persons or areas.
- At least **$5,759,00.00** must be spent on mitigation activities that "increase resilience to disasters and reduce or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship, by lessening the impact of future disasters."
- No more than **$5,298,240.00** (15% of the Program Budget) may be used for public services activities.
- No more than **$6,622,800.00** (15% of the Total Allocation) may be used for planning activities.
- No more than **$2,207,600.00** (5% of the Total Allocation) can be spent on administrative activities.

**The above thresholds are statutory minimums or maximums and are not indicative to actual programmatic allocation amounts.*

These requirements are not mutually exclusive as a single project can meet multiple criteria. The requirements noted above are the regulatory thresholds that must be complied with. In many cases, HCD will designate programs in compliance by budgeting funds above maximums or below minimums.

Funding Criteria

Grantees such as Spokane County must identify how they will distribute these funds and the method of distribution by program type. HCD will opt to have a combination of direct implementation of programs and passthrough grant funding with subrecipients including but not limited to non-profit organizations and local governmental jurisdictions. Additionally, HCD will procure a housing vendor with extensive background experience in disaster recovery programming to oversee various activities. All funding will be reimbursement based.

HCD will solicit applications for programs through multiple Request for Proposal (RFP) processes according to each HUD category. Potential partners that fit eligibility criteria for each program will carry out the work on Spokane County's behalf after a review process by both the Housing and Community Development Advisory Committee (HCDAC) and Board of County Commissioners (BOCC). Should the BOCC approve of the chosen subrecipients, any additional criteria will be established at time of contracting.

At a minimum, each program must meet federal standards for the regular CDBG allocation defined in 24 CFR Part 570. Additionally, all programs must directly tie back to the disaster as identified in this Action Plan and perform 100% of the work within the MID area, Spokane County. The program will address either the unmet need or a mitigation need within the MID area. The CDBG-DR award will prioritize those individuals who are low- to moderate-income as defined by HUD. HCD will also ask that those with a substantial unmet need, such as those who were underinsured at the time of the disaster, also be prioritized. Any additional criteria specific to each program may be identified on a case-by-case basis through subsequent amendments. As the RFP is drafted, HCD will make every effort to update both HUD and the community of additional eligibility criteria being amended.

HCD started the process of implementing maximum grant sizes and amounts of assistance per beneficiary for each program. These maximums are subject to change through future amendments and may be identified in further detail within a program's guidelines. Should future caps be established, or amended caps occur, this process would be a result of evaluating program management and consideration of both elected and community feedback. HCD values the input of the community and encourages participation in identifying any thresholds or additional selection criteria.

Any subrecipient or vendor contracted with Spokane County requiring data from sources such as FEMA or SBA that includes personally identifying information (PII) will require a data sharing agreement. Additionally, any subrecipient or vendor collecting PII during an intake process or eligibility review will be required to have a data sharing agreement with Spokane County. Subrecipient's with this information, and Spokane County's authorization, will be encouraged to reach out to eligible recipients of their program to bolster participation and fulfill the unmet or mitigation need in the MID area.

General Exception Criteria

Spokane County will make certain exceptions to the maximum award amounts, when necessary, to comply with federal accessibility standards or to reasonably accommodate a person with disabilities. Spokane County may provide exceptions to award maximums on a case-by-case basis and will include procedures within program guidelines on how Spokane County or its subrecipients and vendors will analyze the circumstances under which an exception is needed, and the amount of assistance necessary and reasonable. Accessibility is an allowable exception to maximum assistance; requirements may exceed maximum award or benefit amounts as a reasonable accommodation.

Spokane County defines "demonstrable hardship" as exceptions to program policies for applicants who demonstrate undue hardship. Applicants in this situation will be reviewed on a case-by-case basis to determine whether assistance is required to alleviate such hardship. Demonstrable hardship may include excessive amounts of debt due to a natural disaster, disability, etc.

Program Income

According to the Universal Notice, III.B.12.a, program income is defined as gross income generated from the use of CDBG-DR funds and includes but is not limited to the items defined in III.B.12.a (i)-(xii). Program income does not include the sub-items identified in III.B.12.b (i)-(iii).

The written agreement between the grantee and any subrecipient shall specify whether program income received is to be returned to the grantee or retained by the subrecipient. When program income is to be retained by the subrecipient, the agreement shall specify the activities that will be undertaken with program income and that all provisions of the written agreement shall apply to the specified activities. When the subrecipient retains program income, transfers of grant funds by the grantee to the subrecipient shall be adjusted according to the disbursement principles described in section III.B.12.e. Any program income on hand when the agreement expires, or received after the agreement's expiration, shall be paid to the grantee.

Administration

Table 18: Grantee Administration Activity Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
General Administration Total:	$2,207,600	5%
Total:	$2,207,600	5%

Planning

Table 19: Grantee Planning Activity Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation
General Planning Identified in 24 CFR Part 570	$~~2,207,600~~1,000,000	~~5~~2%
Total:	$~~2,207,600~~1,000,000	~~5~~2%

Housing

Housing Programs Overview

Utilizing ~~the FEMA~~ data provided to Spokane County, HCD has allocated funding according to the ratio of primary structures that were fully or partially destroyed with consideration to the proportion of renters and homeowners. ~~As such, the allocation is about 89% reconstruction and rehabilitation for owners who had their primary dwelling destroyed by the fires and 11% allocated for multi-family new construction activities for the renters who lost their homes.~~Spokane County has considered the number of homeowners who have already invested resources in housing recovery efforts and may be eligible for reimbursement opportunities as part of its funding calculation. Additionally, HCD has allocated resources for site work, specifically targeting slash piles and tree planting/removal, within the housing program as an eligible activity. As such, homeowners who apply for HCD's housing programs will have flexibility in the types of activities available for their particular need.

These allocations are subject to change as HCD gathers data on the number of homeowners seeking housing assistance and funding availability.

HCD defines reconstruction as the repairing, rebuilding, or replacing of existing structures, typically on owner-occupied private properties. Under the housing program, reconstruction would take place within the same footprint as the previously destroyed structure. While construction or ~~rehab~~rehabilitation activities are underway, relocation assistance may be provided until the dwelling is ready for occupancy.

Table 20: Grantee Housing Programs Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit
~~**Reconstruction/Rehabilitation**~~	~~$19,603,488~~	~~70%~~
~~**Multi** Single~~**-Family** ~~**New Construction**~~Housing Recovery	$~~2,472,512~~27,789,440	70%
Housing Program Total:	$~~22,076,000~~27,789,440	70%
Total:	$~~22,076,000~~27,789,440	70%

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Housing – ~~Reconstruction/Rehabilitation~~Single-Family Housing Recovery

Amount of CDBG-DR Funds Allocated to this Program: $~~19,603,488~~27,789,440

Eligible Activity(ies): Clearance and demolition, construction of new replacement housing, construction/reconstruction of streets, construction/reconstruction of water/sewer lines or systems, debris removal and site remediation, tree planting and fuels reduction, rehabilitation/reconstruction of residential structures, relocation payments and assistance, and public services. This includes eligible activities defined under Section 105(a)(4)/ 24 CFR 570.202 and Section 105(a)(4)/ 24 CFR 570.201~~(e).~~.

Assistance is available only for primary dwelling units eligible for this program. An individual's primary dwelling unit is the address where an individual spends the most time during the year, per HUD's definition. Second homes are not eligible for assistance. Eligible activities include the reconstruction of housing, rehabilitation of housing to pre-disaster conditions, and reimbursement of such activities for owner-occupation. Additionally, any site work or infrastructure necessary for reconstruction/ rehabilitation including but not limited to driveways, wet and dry utilities, permitting, inspections, debris and slash pile removal, hazard mitigation, mobility (ADA) standards, drainage, retaining walls, and landscaping may be considered eligible activities to make the home safe and habitable.

~~Only costs incurred after an award will be eligible for reimbursement. Reimbursement of pre-award costs is not allowed.~~

National Objective*:* Projects under this program will meet the national objective of benefiting low- and moderate-income (LMI) persons households (LMH) or addressing an urgent need (UN).

The program may use the Urgent Need national objective to assist eligible disaster-impacted applicants with incomes greater than 80% AMI up to ~~120~~150% AMI and who can demonstrate that funds are necessary to address a serious and immediate threat to the household or broader community. Each approved application will describe the urgency, type, scale, and location of the damage to the home that will be repaired and/or reconstructed through the project. The national objective will be met based on an applicant's household income verified at the time of award by the jurisdiction to the beneficiary.

Lead Agency and Distribution Model: HCD anticipates multiple distribution models to expedite housing programs throughout the impacted areas. HCD will select subrecipients to oversee reconstruction and/or rehabilitation efforts through a competitive Request for Proposals (RFP) process.

Additionally, HCD intends to directly administer certain housing programs and will procure a national housing vendor experienced in disaster recovery through a competitive Request for Qualification (RFQ) to support implementation and activity deliverables. Once the housing vendor is procured and contracted, the vendor will carry out various housing activities on the County's behalf. The vendor will procure local contractors and laborers while coordinating recon/rehab activities with the homeowner. This vendor must have a strong background in federal compliance, grant management, and coordination.

Program Description: Housing is the largest category for unmet need and represents a significant portion of the allocation. Many of the households impacted by the disaster lost their homes entirely and have not been able to rebuild due to being low- to moderate-income. This program aims to address those individuals who lost their homes by repairing or replacing them with new housing via reconstruction or rehabilitation efforts. This program will assess each household's status prior to the disaster including the assessed value and the assessed loss along with any current reconstruction efforts to determine the remaining assistance needed to replace the home.

This program will have a thorough intake process for each homeowner seeking assistance which will consist of but is not limited to an income eligibility review, duplication of benefits review, financial status, property ownership, and ability to undertake a period of affordability.

~~The Reconstruction/Rehabilitation~~The Single-Family Housing Recovery Program will cover additional costs to comply with Federal, State, and local construction and habitability standards, such as replacing on-site residential infrastructure, complying with energy related building standards, and ensuring that homes are accessible for individuals with disabilities and/or senior residents. All applicable construction and contractor standards will be followed, and details will be provided in the program guidelines.

Eligible Geographic Areas: HUD-identified MID, Spokane County, with specific emphasis on the Medical Lake and Elk communities.

Other Eligibility Criteria: Applicant(s) must have property control. The property must be the owner's primary residence at the time of the disaster and at the time the award is distributed. The activity meets a HUD-defined national objective. Priority will be given to LMI homeowner applicants who meet all other eligibility requirements.

Per the property, the costs for rehabilitation are reasonable and consistent with market costs at the time and place of construction. Property taxes are current, on an approved payment plan, or have an exemption under current laws.

All applicants and properties must have clearly defined tie-back to the Oregon and Gray Road Wildfires. Any related property damage must be verified by program staff and make a strong case for a remaining unmet need.

Any participants in this program may be eligible for public services such as interim mortgage or rental assistance. These services will be provided on a case-by-case basis with further guidance provided by Spokane County through the selected housing vendor or its subrecipients. A homeowner receiving any form of interim mortgage assistance is not eligible for CDBG-DR rental assistance or utility payments for the same period per Section III.D.5.f of the Universal Notice. Any activity using interim mortgage or rental assistance under the housing benefit program is exempt from the public services cap. Participants may utilize interim mortgage assistance for up to 20 months and rental assistance for up to 24 months. The amount calculated on a monthly basis will be the lesser of:

- The actual cost of rent or the mortgage,
- The amount needed to make housing costs affordable to the household, or
- The maximum applicable HOME/CDBG fair market rents based on the household size and location.

Duplication of Benefits: A duplication of benefits analysis must be conducted for each project to ensure CDBG-DR funds do not duplicate funds provided from another source. The applicant and the grantee must document all sources of funds provided for the project, such as:

- FEMA or SBA payments;
- Private insurance payments;
- Grants and/or donations; and/or
- Any other source of funds dedicated to the project.

Any funds that count as duplicative assistance will be subtracted from the total cost of repairs or eligible reconstruction assistance and the CDBG-DR amount will be capped at the difference between the total cost and the amount of duplicative assistance.

Maximum Amount of Assistance Per Beneficiary: HCD has assessed a maximum award cap dependent ~~upon household type and need.~~need following a review of best available data. The program maximum amount includes the costs associated with any reconstruction/rehabilitation activities and site work including but not limited to necessary infrastructure and/or hazard mitigation for the homeowner, creating a "Unified Cap".

A homeowner who lost a single-family home ~~with a permanent foundation~~ would be eligible for up to a maximum of $400,000 ~~while a homeowner who lost their mobile home would be eligible for up to $250,000. These home types are consistent with FEMA's definitions identified in the Unmet Needs Assessment. For all other home types, the~~. This maximum ~~benefit would be up to $250,000 dependent upon the program's definitions~~award cap was determined after a thorough review of ~~pre-existing housing types.~~the assessed values of homes lost in the disaster and consideration of additional costs including but not limited to site work, debris removal, utilities, etc. For all homeowners seeking reconstruction assistance, Spokane County or its subrecipients/contractors will work with the household to provide an array of housing options that best fit their financial situation along with clear guidance on eligibility and qualifications.

Spokane County will provide assistance based upon need and may provide various housing options that are no more than comparable to the previous structure that was originally destroyed. This methodology ensures financial stability and sustainability in the program's design.

For all rehabilitation activities, a maximum amount of $100,000 per beneficiary, or 25% of the assessed value of the home, will be applied; whichever is less.

For public services such as interim mortgage/rental assistance, the maximum amount per beneficiary is subject to, and included in, the ~~unified cap of the homeowner's previous housing type.~~Unified Cap. Maximum caps for these services per beneficiary may be determined in an activity's policies and procedures.

Spokane County recognizes that many homeowners have already built back or are in the process of building back. As such, Spokane County may permit reimbursements of pre-application, allowable costs for homeowners which were incurred on or after the incident date of the qualifying disaster identified in the Allocation Announcement Notice (AAN) FR-6512-N-01 (January 16, 2025). In addition to the terms described in the Universal Notice, eligible costs for homeowners are described below:

- Costs incurred are for disaster relief payments, rehabilitation, demolition, and reconstruction of single-family residential buildings owned by private individuals.
- For an expense to be eligible for reimbursement, the cost must have been incurred following the date of the disaster (August 18, 2023), up to January 21, 2027 (two years following the AAN applicability date). Should the homeowner seeking reimbursement for eligible costs apply for a formal application for CDBG-DR recovery assistance from HCD or its subrecipients/contractors prior to January 21, 2027, it is highly recommended the homeowner stop all recovery work as costs incurred after submitting a formal application shall not be considered eligible for reimbursement. Any recovery costs the homeowner incurs following January 21, 2027, shall not be considered eligible for reimbursement per the Universal Notice.
- For rehabilitation and reconstruction costs, applicants may only charge costs for activities completed within the same footprint of the damaged structure, sidewalk, driveway, or other developed area.
- Costs must be considered reasonable, necessary, and be adequately documented as required by 2 CFR 200.403.
- Must meet all requirements at 24 CFR Part 58 (Environmental Review).
- Assistance and the amount thereof is conditioned upon a Duplication of Benefits determination.

Should the homeowner be deemed eligible for reimbursement of pre-application and/or pre-award costs, Spokane County has provided a reimbursement maximum amount per beneficiary limit based upon the Unified Cap for reconstruction activities while also prioritizing homeowners who are low- and moderate-income. Homeowners likely underinsured and below 80% AMI will be prioritized for reimbursement programming while homeowners qualifying above the 80% threshold will be considered part of the urgent need category and treated on a first-come-first-serve basis. The following table identifies the maximum award limits for reimbursement of eligible costs based upon income determinations.

Table 21: Reimbursement Award Cap Matrix

Income Tier/National Objective	Household Income (% AMI)	Reimbursement Cap	CDBG-DR National Objective
LMI – Very Low Income	≤30% AMI	Up to $400,000	LMI
LMI – Low Income	>30% - 50% AMI	Up to $400,000	LMI
LMI – Moderate Income	>50% - 80% AMI	Up to $400,000	LMI
Urgent Need – Band 1	>80% - 100% AMI	Up to $80,000	Urgent Need Only
Urgent Need – Band 2	>100% - 120% AMI	Up to $65,000	Urgent Need Only
Urgent Need – Band 3	>120% - 150% AMI	Up to $50,000	Urgent Need Only

Spokane County, to comply with its overall benefit requirement that 70 percent of funds be used to benefit LMI persons, has separated the following funds for the Single-Family Housing Recovery Program:

- Approximately $19,452,608 shall be available for LMI persons (80% AMI or lower).
- Approximately $8,336,832 shall be available for persons who qualify under Urgent Need (greater than 80% AMI to 150% AMI).

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Exceptions to the maximum awards are exclusive to reconstruction/rehabilitation activities and include but are not limited to properties in need of accessibility modifications or change orders due to unforeseen conditions that result in the total project cost exceeding the maximum award amount. All exceptions to the maximum award will be reviewed according to program policies and procedures prior to being awarded. HCD may add or remove exceptions to maximum awards in subsequent amendments.

Temporary Relocation Assistance: This program will pay reasonable costs based on rate schedules developed by Spokane County to cover the amount of time an applicant must be temporarily relocated out of the unit while it is rehabilitated. The maximum amount and additional details will be described in the program policies and procedures.

Uniform Relocation Act (URA) policies and notification requirements will be followed to assist any individuals who are temporarily or permanently displaced due to program activities. Should a beneficiary need to be moved for reconstruction or rehabilitation activities, these accommodations shall be reasonable in cost, safe, and in accordance with HUD's other relocation guidelines.

Maximum Income of Beneficiary: Due to the urgent recovery needs of the community, HCD has established a maximum household income of ~~120~~150% AMI for program eligibility. However, assistance provided to households with incomes at or below 80 percent of AMI will meet the Low- and Moderate-Income Housing (LMH) national objective. Households with incomes above 80 percent of AMI will meet the Urgent Need national objective. The program will prioritize LMI households, going down a by-name list, to support the HCD's obligation that at least 70 percent of the total CDBG-DR grant funds benefit LMI persons and households before assistance is provided to households exceeding the 80% AMI threshold.

Mitigation Measures: Beneficiaries of the program will have the option of incorporating non-combustible materials, metal roofing, and other fire-resistance measures as an added mitigation benefit. Should a household opt to include such materials in the design, the cost for those materials may be pulled from the CDBG-DR mitigation set-aside category as it will assist households in the event of another wildfire disaster.

Additionally, should the site work needed for the impacted property include removing hazardous trees, slash piles, or other wildfires risks, the mitigation fund can be utilized. These strategic investments will encourage healthy forestry practices and prevent future damage.

Reducing Impediments for Assistance: HCD will perform reviews of impediments to fair housing during risk assessments of its programs. Based on the analysis of unmet need, the analysis of impediments, and the limited CDBG-DR funding available, Spokane County will ensure their CDBG-DR programs will not have an unjustified discriminatory effect on, or failure to benefit, vulnerable populations and underserved communities.

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~~Housing – Multi-Family New Construction~~

~~**Amount of CDBG-DR Funds Allocated to this Program:** $2,472,512~~

~~**Eligible Activity(ies):** Acquisition – general, clearance and demolition, construction of new housing, construction/reconstruction of streets, construction/reconstruction of water/sewer lines or systems, debris removal, and relocation payments and assistance. This includes eligible activities defined under Section 105(a)(4)/ 24 CFR 570.202.~~

~~Assistance is available for interested parties seeking funds for the acquisition of property for new construction of multi-family housing. Eligible activities include any site work or infrastructure necessary to construct housing that is safe, habitable, and affordable.~~

~~**National Objective:** Projects under this program will meet the national objective of benefiting low- and moderate-income (LMI) persons households (LMH).~~

~~**Lead Agency and Distribution Model:** A subrecipient and/or housing developer may be selected to perform the work on Spokane County's behalf through a competitive Request for Proposal process. Interested parties will submit proposals for multi-family housing complexes which will serve LMI persons and individuals impacted by current and future disasters.~~

~~**Program Description:** Renters who lost their homes immediately became displaced due to a lack of property ownership. In these disaster events, it is important that Spokane County's housing stock is prepared and able to respond in a crisis. As such, a proportion of the housing budget will go towards the creation of multi-family housing complexes throughout the county to ensure disaster-impacted households experiencing displacement have options.~~

This program aims to address the need for safe, affordable housing throughout the county. Spokane County will enter into agreements with all new construction projects using these funds to ensure occupancy priority is given to households displaced by a disaster event; occupying said units once it becomes available. This proposal for multi-family housing units may provide a greater range of options for households in crisis.

Eligible Geographic Areas: HUD-identified MID, Spokane County, with specific emphasis on the Medical Lake and Elk communities.

Other Eligibility Criteria: The proposed location of the new construction is easily accessible and meets all federal, state, and local building requirements. The activity meets a HUD-defined national objective. The multi-family complex has at least 51% of units occupied by LMI persons.

The cost of construction is reasonable and consistent with market rates at the time and place of construction. If other funding sources are involved, CDBG-DR funds must be limited to the unmet need. All proposed properties must have clearly defined tie-back to the Oregon and Gray Road Wildfires.

Any construction of a building with more than four (4) rental units will include the installation of broadband infrastructure except when:

- The location of the new construction makes the broadband infrastructure infeasible,
- The cost of installing broadband infrastructure would result in a fundamental alteration in the nature of its program or activity or in an undue financial burden, or
- The structure of the housing makes installation of broadband infrastructure infeasible.

The new construction project will include, in its policies and procedures or program guidelines, periods of affordability, affordable rental rates, establish mechanisms for recapturing funds such as deed restrictions, and other such items included in III.D.5.c of the Universal Notice.

Maximum Amount of Assistance Per Beneficiary: Because the intended result of any activities under this program will result in housing units and not be provided directly to the beneficiary, HCD has not determined a maximum benefit other than the full budget of said program: $2,472,512. HCD will provide assistance based upon need.

Maximum Income of Beneficiary: At least 51% of all units must be occupied by a household earning no more than 80% AMI. Mixed incomes are allowed on the property, with no maximums set for the other 49% of units. HCD encourages prioritizing households which are comprised of LMI persons.

Affordability Period: All new multi-family construction projects shall be subject to a period of affordability for no less than twenty (20) years. During the affordability period, assisted units must meet the definition of "affordable rents" as defined by HUD's most recent Fair Market Rents and Income Limits data or meet other applicable program requirements as determined by Spokane County.

~~This requirement will be secured through a recorded land use restriction, covenant, or similar instrument approved by Spokane County. The affordability restriction must run with the land for the duration of the affordability period. Spokane County will ensure that affordability restrictions are enforceable and imposed by recorded deed restrictions, covenants, property liens, bylaws, or other similar mechanisms.~~ ~~**Mitigation Measures:** Because some units may be set aside for disaster events, mitigation dollars may be utilized for these projects to ensure capable capacity. Additionally, Spokane County will work with fire departments and Emergency Management to coordinate the locations that would be best suited for temporary relocation or low hazard risk areas.~~

~~**Reducing Impediments for Assistance:** HCD will perform reviews of impediments to fair housing during risk assessments of its programs. Based on the analysis of unmet need, the analysis of impediments, and the limited CDBG-DR funding available, Spokane County will ensure their CDBG-DR programs will not have an unjustified discriminatory effect on or failure to benefit vulnerable populations and underserved communities.~~

Infrastructure

Infrastructure Programs Overview

This category will award funds to eligible projects within the identified HUD MID area to address unmet recovery and mitigation needs for general infrastructure and public facilities. Grant funds will allow recipients to design and construct infrastructure and public facilities that will directly benefit individuals and the larger community. HCD utilized the input from the community to create a general infrastructure fund to encapsulate potential projects that are not known at this time. These resources will be allocated accordingly through future engagement and input from stakeholders.

Table ~~21~~22: Grantee Infrastructure Programs Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit
General Infrastructure	$3,532,160	70%
Infrastructure Program Total:	$3,532,160	70%
Total:	$3,532,160	70%

Infrastructure – General Infrastructure

Amount of CDBG-DR Funds Allocated to this Program: $3,532,160

Eligible Activity(ies): Acquisition, construction, reconstruction, or installation of public works, facilities, and site or other improvements. Clearance and demolition, construction/reconstruction of public streets, water lift stations, water/sewer lines, debris removal, planning, privately owned utilities, and

rehabilitation of a public improvement are all eligible activities for infrastructure programming in accordance with Section 105(a)(2) and 24 CFR Part 570 Subpart C.

National Objective*:* Projects under this program will meet the national objective of benefiting specific low- and moderate-income (LMI) persons (LMC), an area of LMI persons (LMA), or addressing an urgent need (UN).

Any proposed activity under the LMA national objective must ensure the area is at least 51% LMI using the LMISD Map Application provided by HUD. Should Spokane County be identified as an upper quartile grantee and receive a lower percentage than the 51%, the HUD-provided exception criteria will apply. If an activity fails to meet the 51% threshold, CDBG-DR funds may pay a proportion of the overall project in accordance with the proportion of LMI persons in a service area – I.E. 30% LMI means only 30% of the project may be allowable for CDBG-DR funds.

The program may use the Urgent Need national objective to assist eligible disaster-impacted applicants with incomes greater than 80% AMI to ~~120%~~ 150%AMI and who can demonstrate that funds are necessary to address a serious and immediate threat to the household or broader community. Each approved application will describe the urgency, type, scale, and location of the proposed project. The national objective will be met based on an applicant's household income verified at the time of award by the jurisdiction to the beneficiary.

Lead Agency and Distribution Model: Spokane County Public Works may perform any road paving or resurfacing. A subrecipient and/or contractor(s) may be selected to perform the work on Spokane County's behalf through a competitive Request for Proposal process.

Program Description: This category includes general infrastructure work to address the unmet recovery and resiliency needs associated with public infrastructure and critical facilities. At this time, no projects have been selected, and specific programming chosen in the future may pull from this general fund through subsequent amendments.

Regardless, this program will award funds to eligible projects that address unmet recovery and mitigation needs via general infrastructure and public facilities that will directly benefit individuals and the larger community.

Eligible Geographic Areas: HUD-identified MID, Spokane County, with specific emphasis on the Medical Lake and Elk communities.

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Other Eligibility Criteria: Restore, construct, and reconstruct critical infrastructure and public facilities that will directly benefit residents impacted by the disaster and the community at large.

Entities applying for and receiving funds under this program must meet one of the following definitions:

- Unit of general local government/municipalities (including departments and divisions)
- Tribal government

- Washington State agency, authority, trust, or board
- Non-governmental organization or not for profit entity (501(c)(3)), or entity pending approval of 501(c)(3) status
- Council of governments (COG)
- A consortium of any of the above with the established authority and internal controls necessary to receive federal grant funds.

Maximum Amount of Assistance Per Beneficiary: HCD is setting the total budget of $3,532,160 as the maximum for this program. The maximum award is subject to a review of duplication of benefits and may be adjusted to ensure completion of projects and implementation of resiliency and mitigation measures. Future projects will be identified for specificity of funding and will be based upon need.

Maximum Income of Beneficiary: HCD has not established a maximum income of beneficiary for eligibility for the program. The program must ensure that a minimum 51% of households assisted meet the low- to moderate-income threshold to meet CDBG-DR beneficiary requirements and that at least 70% of the program's budget goes to LMI beneficiaries.

Mitigation Measures: Beneficiaries of the program may have safe and accessible public facilities, or evacuation routes upgraded or added, from infrastructure improvements/investments. As a result, mitigation set-aside funds may be used for infrastructure programming where necessary to assist in the preparation and mitigation of future disasters.

This program is designed to promote sound, sustainable long-term recovery and projects that account for the unique hazards, opportunities, land use restrictions, urban growth boundaries, underserved communities, and disaster impacts within Spokane County. For infrastructure projects, it is encouraged, to the extent practicable, to include the use of green, or energy related, infrastructure design and implementation. Project proposers will be required to describe the data and/or planning analysis they will use in their evaluation of hazard risk, including climate-related natural hazards.

Reinforcing and modernizing infrastructure systems would provide multiplicative benefit as they include faster response and recovery after disasters, fewer disruptions to critical services, and enhanced public safety throughout the improvement area.

Reducing Impediments for Assistance: HCD will perform reviews of impediments to fair housing during risk assessments of its programs. Based on the analysis of unmet need, the analysis of impediments, and the limited CDBG-DR funding available, Spokane County will ensure their CDBG-DR programs will not have an unjustified discriminatory effect on or failure to benefit vulnerable populations and underserved communities.

Economic Revitalization

Economic Revitalization Programs Overview

The funds allocated for programming in the following section are directly tied to business-oriented activities. Local economies that may have been impacted by the disaster might be eligible for assistance and/or reimbursement of losses. Strengthening small businesses and alleviating financial hardships improves the community's well-being.

Table ~~22~~23: Grantee Economic Revitalization Programs Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit
Business Assistance – Recovery	$~~2,207,600~~1,000,000	70%
Economic Revitalization Program Total:	$~~2,207,600~~1,000,000	70%
Total:	$~~2,207,600~~1,000,000	70%

Economic Revitalization – Business Assistance – Recovery

Amount of CDBG-DR Funds Allocated to this Program: $~~2,207,600~~1,000,000

Eligible Activity(ies): Economic development or recovery activities that create/retain jobs, privately owned utilities, and rehabilitation/reconstruction of non-residential structures.

Provide low interest loans or grants for certified businesses affected by the disaster. Provide reimbursement for equipment that was destroyed or damaged due to the disaster. This equipment must be tied back to a business.

Repair, replacement, or reimbursement of fencing, outbuildings, facades, and/or other business-related structures including but not limited to farming or other commercial property.

National Objective*:* Assistance provided under this program will meet the direct-benefit national objective of benefiting LMI jobs (LMJ), an area of LMI persons (LMA), or addressing an urgent need (UN).

The program may use the Urgent Need national objective to assist eligible disaster-impacted applicants with incomes greater than 80% AMI to ~~120~~150% AMI and who can demonstrate that funds are necessary to address a serious and immediate threat to the household or broader community. Each approved application will describe the urgency, type, scale, and location of the proposed project. The national objective will be met based on an applicant's household income verified at the time of award by the jurisdiction to the beneficiary.

Lead Agency and Distribution Model: Spokane County HCD would oversee the loan/grant program. A subrecipient may be selected to perform the work on Spokane County's behalf through a competitive Request for Proposal process. This may include but is not limited to an agency which will assess damage

to businesses during the disaster, and whether they would qualify for assistance following a duplication of benefits review, or an organization overseeing job creation/retention activities.

Program Description: Businesses that have not fully recovered from the fires and meet income eligibility would qualify for a small business grant or loan to cover overhead costs. Additionally, businesses that have reportedly lost vital equipment or property essential for the business' function may be eligible for reimbursement, reconstruction, or repairs. This program, which would facilitate these activities for equipment losses and outbuildings such as agricultural/commercial structures, would alleviate the strain on the economic impact the disaster had on these communities, filling the remaining unmet need for businesses.

Additionally, business owners who had employees resign or individuals who lost their job, or are at risk of losing their job, as a direct result of the wildfire disaster may be eligible for a job creation/retention program following an income eligibility review.

Eligible Geographic Areas: HUD-identified MID, Spokane County, with specific emphasis on the Medical Lake and Elk communities.

Other Eligibility Criteria: Must have a valid business when applying which existed at the time of the disaster. Applicants must prove that their business has been negatively impacted and/or experienced a loss in assets, employees, or customers due to the disaster.

Maximum Amount of Assistance Per Beneficiary: HCD has determined a maximum loan or grant of $160,000 per business to be used for economic revitalization.

Maximum Income of Beneficiary: HCD has established a maximum beneficiary income not to exceed 80% AMI to be eligible for the program. Business owners exceeding this income threshold cannot be provided with grant or loan assistance due to prioritizing LMI persons. The program must ensure that a minimum 51% of households assisted meet the low- to moderate-income threshold to statutorily meet CDBG-DR beneficiary requirements and that at least 70% of the program's budget goes to LMI beneficiaries.

As such, the program will prioritize LMI beneficiaries first and foremost, going down a by-names list before consideration is given to business owners exceeding the 80% AMI threshold.

Mitigation Measures: Beneficiaries of the program will have their businesses or farms receive compensation to cover certain losses because of the fire. This program does not intend to use any funds from the mitigation set-aside.

Reducing Impediments for Assistance: HCD will perform reviews of impediments to fair housing during risk assessments of its programs. Based on the analysis of unmet need, the analysis of impediments, and the limited CDBG-DR funding available, Spokane County will ensure their CDBG-DR programs will not

have an unjustified discriminatory effect on or failure to benefit vulnerable populations and underserved communities.

Public Services

Public Services Programs Overview

Various public services may be needed for recovery efforts as survivors of the disaster navigate through multiple types of hardships. This category aims to provide services to the households directly impacted by the disaster. HCD has devoted more resources into this category as stakeholders have identified a plethora of different activities that may need to be available to the public at large. The following section provides an initial estimate and is subject to change through future amendments.

Table ~~23~~24: Grantee Public Services Programs Overview

Eligible Cost Category	CDBG-DR Allocation Amount	% of CDBG-DR Allocation for LMI Benefit	Is this Program Exempt from the 15% Public Service Cap?
General Assistance/Operations	$~~5,298,240~~2,000,000	70%	No
Public Services Program Total:	$~~5,298,240~~2,000,000	70%	N/A
Total:	$~~5,298,240~~2,000,000	70%	N/A

Public Services – General Assistance/Operations

Amount of CDBG-DR Funds Allocated to this Program: $~~5,298,240~~2,000,000

Eligible Activity(ies): General assistance for operations and administration activities including but not limited to outreach, data collection, case management, public facilities, legal services, code enforcement, and other public services defined under Section 105(a)(4)/ 24 CFR 570.201(e).

Provide individual or community-wide services for households impacted by the disaster. These services may be provided directly or indirectly.

National Objective*:* Projects under this program will meet the national objective of benefiting specific low- and moderate-income (LMI) persons (LMC) or addressing an urgent need (UN).

The program may use the Urgent Need national objective to assist eligible disaster-impacted applicants with incomes greater than 80% AMI up ~~to 120~~to150% AMI and who can demonstrate that funds are necessary to address a serious and immediate threat to the household or broader community. Each approved application will describe the urgency, type, scale, and location of the proposed project. The

national objective will be met based on an applicant's household income verified at the time of award by the jurisdiction to the beneficiary.

Lead Agency and Distribution Model: A series of subrecipients will be selected to perform the work on Spokane County's behalf through a competitive Request for Proposal process.

Program Description: Low and moderate-income households may lack the necessary resources to acquire basic needs. Funding local organizations' operational or administrative expenses allows additional services including but not limited to food assistance, outreach, providing propane, and legal services to be available for disaster survivors. Spokane county will invest resources in supportive service systems with targeted programming for survivors of the disaster.

Eligible Geographic Areas: HUD-identified MID, Spokane County, with specific emphasis on the Medical Lake and Elk communities.

Other Eligibility Criteria: Any citizens seeking services must identify how the service needed is related to the disaster event. If the activity involves any outreach or subsequent data collection, a data sharing agreement may be required as part of the program's deliverables in identifying unmet need and creating a by-names list of citizens still seeking recovery programming.

Maximum Amount of Assistance Per Beneficiary: HCD is setting the total budget of $~~5,298,240~~1,500,000 as the maximum for this program. The maximum award is subject to a review of duplication of benefits and may be adjusted per program dependent upon the activity type. Future projects will be identified for specificity of funding and will be based upon need.

Maximum Income of Beneficiary: HCD has not established a maximum income of beneficiary for eligibility for the program. The program must ensure that a minimum 51% of households assisted meet the low- to moderate-income threshold to meet CDBG-DR beneficiary requirements and that at least 70% of the program's budget goes to LMI beneficiaries.

The maximum amount of assistance may vary per activity and the types of services being provided. For each activity, the program's policies and procedures or guidelines may establish maximums to ensure financial sustainability.

Mitigation Measures: Wraparound services will be provided in various methods to community members. This will create an environment to support ongoing recovery efforts. This program does not intend to use any funds from the mitigation set-aside.

Reducing Impediments for Assistance: HCD will perform reviews of impediments to fair housing during risk assessments of its programs. Based on the analysis of unmet need, the analysis of impediments, and the limited CDBG-DR funding available, Spokane County will ensure their CDBG-DR programs will not have an unjustified discriminatory effect on or failure to benefit vulnerable populations and underserved communities.

CDBG-DR Mitigation Set-Aside

CDBG-DR Mitigation Set-Aside Programs Overview

The following section describes various categories that will assist eligible applicants in addressing mitigation related infrastructure and housing needs that will reduce the risk of disaster in Spokane County. The community spoke loudly on this issue and HCD has allocated resources accordingly, prioritizing the removal of dead trees and slash piles left on people's properties. A general fund for mitigation will also be utilized for the preparation and prevention of future disasters. This fund is flexible and will likely be amended to reflect various activities determined through future amendments.

Table ~~24~~25: Grantee CDBG-DR Mitigation Set-Aside Programs Overview

Eligible Cost Category	CDBG-DR Mitigation Set Aside Allocation Amount	% of CDBG-DR Allocation for LMI Benefit	Does this Program have tie back to the disaster?
General Mitigation Set-Aside Programming	$6,622,800	70%	Yes
Mitigation Set-Aside Program Total	$6,622,800	70%	N/A
Total:	$6,622,800	70%	N/A

CDBG-DR Mitigation Set-Aside – General Mitigation Set-Aside Programming

Amount of CDBG-DR Funds Allocated to this Program: $6,622,800

Eligible Activity(ies): Acquisition, construction, reconstruction, rehabilitation, demolition and clearance, relocation, debris removal, planning, public services, public facilities such as community centers or emergency shelters in a disaster event, water/sewer improvements, hazardous material testing and abatement, fire stations/equipment, privately owned utilities, environmental remediation, parks and tree planting programs, fuels reduction, and other identified mitigation activities in 24 CFR Part 570 Subpart C and the Universal Notice.

Any HUD-identified mitigation activity that assists in the preparation or prevention of any future disaster. Spokane County will prioritize activities that address wildfire risks as it is one of the primary hazards identified in the Mitigation Needs Assessment. Funding may be used in tandem with other local, state, or federal resources and for other identified programs within this Action Plan.

National Objective*:* Projects under this program will meet the national objective of benefiting specific low- and moderate-income (LMI) persons (LMC) or households (LMH), an area of LMI persons (LMA), or addressing an urgent need (UN).

The program may use the Urgent Need national objective to assist eligible disaster-impacted applicants with incomes greater than 80% AMI and who can demonstrate that funds are necessary to address a serious and immediate threat to the household or broader community. Each approved application will describe the urgency, type, scale, and location of the proposed project. The national objective will be met based on an applicant's household income verified at the time of award by the jurisdiction to the beneficiary.

Lead Agency and Distribution Model: A subrecipient will be selected to perform the work on Spokane County's behalf for various mitigation programs through a competitive Request for Proposal process. If any infrastructure mitigation projects are involved, Spokane County or the associated jurisdiction would be the lead agency.

Due to the likelihood of programs overlapping in the recovery process, the selected housing vendor for the Housing Program may oversee some of the distribution of mitigation funds.

Program Description: This category includes general mitigation set-aside activities related to the identified Mitigation Needs Assessment as part of this Action Plan. These activities may include but are not limited to infrastructure, public facilities, housing, planning, tree planting/removal, and environmental mitigation. HCD will establish a tree planting and slash pile removal program which will prevent future soil erosion, rebuild sustainable forest ecosystems, and remove any remaining fire risk on already impacted households. At this time, no other projects have been identified, and specific programming will be chosen through subsequent amendments and pull from this general fund.

Eligible Geographic Areas: HUD-identified MID, Spokane County, with specific emphasis on the Medical Lake and Elk communities.

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Other Eligibility Criteria: Prepare or prevent future disasters. Must meet the HUD definition of Mitigation and tie back to the disaster. The proposed activity must align with local and/or regional plans and address one of the identified Natural Hazards in the Mitigation Needs Assessment.

Maximum Amount of Assistance Per Beneficiary: HCD is setting the total budget of $6,622,800 as the maximum for this program. The maximum award is subject to a review of duplication of benefits and may be adjusted to ensure completion of projects and implementation of resiliency and mitigation measures. For private property specific programs, the number of trees/slash piles removed, maximum amount available for fuels reduction, or number of trees replanted per property may be determined in the activity's policies and procedures. Future projects will be identified for specificity of funding and will be based upon need.

Maximum Income of Beneficiary: HCD has not established a maximum income of beneficiary for eligibility for the program. The program must ensure that a minimum 51% of households assisted meet the low- to moderate-income threshold to meet CDBG-DR beneficiary requirements and that at least 70% of the program's budget goes to LMI beneficiaries.

Mitigation Measures: Beneficiaries of the program may have some benefit through a mitigation measure activity. Utilizing mitigation set-aside will be critical in the health, safety, and well-being for the communities impacted by the disaster.

Reducing Impediments for Assistance: HCD will perform reviews of impediments to fair housing during risk assessments of its programs. Based on the analysis of unmet need, the analysis of impediments, and the limited CDBG-DR funding available, Spokane County will ensure their CDBG-DR programs will not have an unjustified discriminatory effect on or failure to benefit vulnerable populations and underserved communities.

General Information

Citizen Participation

Spokane County's Citizen Participation Plan (CPP) was revised on June 12th, 2025, to include the CDBG-DR award to provide guidance on citizen engagement. This document sets forth the policies and procedures for citizen participation. Our current CPP can be found on our website: Citizen Participation | Spokane County, WA. HCD has abided all federal requirements set forth for public notification in preparation of its stakeholder engagement meetings with both the Elk and Medical Lake communities.

Opportunities for citizen input for this Action Plan were provided through two separate events which included a presentation detailing information regarding the award, a survey ranking activity priorities, and fielding questions and comments from community members in attendance. These events were hosted by the Spokane Region Long Term Recovery Group (LTRG) in association with HCD to present both current and future work. These meetings were in-person with a hybrid option available. Pamphlets and social media postings regarding both events are included below.

Figure 9: Outreach Notice for the Elk Meeting

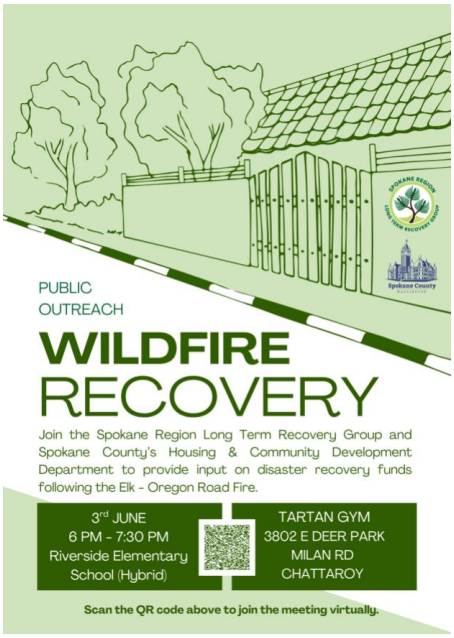

Figure 10: Outreach Notice for the Medical Lake Meeting

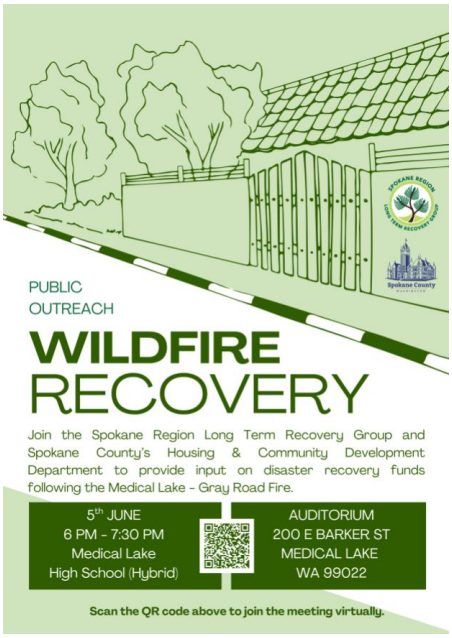

Figure 11: Community Engagement in Elk

Figure 12: Community Engagement in Medical Lake

In addition to the engagement activities above, Spokane County published this Action Plan to the HCD CDBG-DR website for a 30-day public comment period beginning on June 12th, 2025. HCD posted a Public Hearing Notice in the *Spokesman* two weeks in advance on Wednesday, May 28th, 2025. Any comments not implemented in the Plan or rejected shall be detailed in the public comments section along with reasoning.

Consultation of Developing the Action Plan

Table ~~25~~26: Consultation Overview

Partners Consulted	Describe Consultation
Federal Partners (FEMA, SBA)	Federal Government partners such as FEMA and SBA performed hands-on work in the disaster communities to assess the damage and gather vital information used throughout this Action Plan.
Local/State Government	Spokane County Commissioners, City of Medical Lake, Spokane County Wildfire Mitigation Coalition.
Indian Tribes	Will consult the local tribes for any proposed activities using these funds.
Nongovernmental organizations	Spokane Region Long Term Recovery Group.
Private sector	Avista, Inland Power, and Private Citizens.
State and local emergency management agencies that have primary responsibility for	Spokane County Emergency Management.

the administration of FEMA funds	
Agencies that manage local Continuum of Care	Spokane Continuum of Care for disaster impact on current resources.
Public Housing Agencies	Spokane County consulted with the local housing authority for initial affordable housing projects and areas of involvement.
HUD-approved housing counseling agencies	N/A
State Housing Finance Agencies	N/A
Other Stakeholders	N/A

Public Comments

HCD will seek public comments on all documents related to HCD programming as applicable. Efforts to engage the citizens of Spokane County will include ongoing communication with community partners and updates to the HCD website as information becomes available. Interested citizens are encouraged to attend open public meetings held by the Housing and Community Development Advisory Committee (HCDAC) and Board of County Commissioners (BOCC) when they become available. Spokane County and members of the HCDAC will continue to pursue strategies that encourage diverse citizen participation.

Both the Action Plan and any substantial amendments to the Plan shall have a minimum 30-day public comment period which will be reflected in the Spokane County HCD CPP. Interested parties that would like to receive updates on when these meetings will occur are encouraged to join the Disaster Recovery Mailing List on the HCD website to stay involved outside of our regular means of communication.

Public Hearings

Per the Federal Register's approach for CDBG-DR grantees with allocations under $500 million, at least one public hearing is required during the 30-day comment period. Spokane County held a public meeting on June 12th, 2025, where the Action Plan was opened for a 30-day public comment period by the HCDAC from June 12th to July 14th. There was approximately one community member in attendance and any comments made during the meeting are included in this Action Plan. The hearing provided reasonable opportunity, and maximum accessibility for citizens to comment on the use of grant funds.

Spokane County held a public hearing during the 30-day public comment period on July 10th, 2025. This meeting will be posted in the *Spokesman* approximately two-weeks in advance and additional outreach and engagement notifying the public of said meeting may occur. Any outreach efforts will be listed in this section. This public hearing will allow the public the opportunity to both examine this Action Plan and

provide comment. There were approximately two community members in attendance and their public comments made during the July 10th meeting are included in this plan.

Access to Public Hearings

A public notice for the June 12th meeting and July 10th hearing was published in the *Spokesman*, two weeks in advance in accordance with the CPP. Additionally, HCD sent out an email to everyone who signed up for the mailing list during the community stakeholder engagement series for the June 12th meeting. The public meeting and hearing were held at a time and accessible location convenient to potential and actual beneficiaries. The in-person meeting and hearing were held in a facility accessible to people with disabilities, with accommodation to ensure full participation opportunities, and was also broadcast via Teams for additional accessibility. The agenda, minutes, and any included presentations for each HCDAC meeting is posted on the HCD website, HCDAC Agendas & Minutes | Spokane County, WA.

Spokane County is committed to providing equal access to its facilities, programs, and services. For persons with disabilities, Spokane County individuals who are deaf or hard of hearing, please contact HCDInfo@spokanecounty.org at least 48 hours before the meeting date. All HCD documents with an associated comment period shall intend, to the maximum extent feasible, to accommodate the needs of non-English speaking residents. Individuals requesting assistance should contact the HCD department 48 hours prior to the public hearing, however, if a request is made within 48 hours, every reasonable effort will be made to provide assistance.

Any future public hearing regarding this Action Plan, including substantial amendments, shall be subject to a minimum of two (2) weeks' notice to the public per the most recent HCD CPP. During said meeting, all information described above facilitating equal access and opportunity, also described within the CPP, shall be abided and provided in the same manner.

Consideration of Public Comments

The following provides a summary of public comments received for the Spokane County CDBG-DR Action Plan in response to the 2023 Severe Wildfire Event. This section will include comments received both during the community engagement series and during the public comment period of June 12th, 2025, through July 14th, 2025. Spokane County received a total of 13 comments during the stakeholder events and 7 comments during the 30-day public comment period. Additionally, two community members spoke at the public hearing; their comments are included in this Action Plan.

Community Engagement Series

The following comments listed below were provided during our engagement series. Responses to the comments provided and comments received during the public comment period are included and dated.

Future Comment Periods

Comments received for all Substantial Amendments to the Action Plan or other general public comments throughout the lifecycle of this award shall be included in the following section and dated accordingly.

Summary of Public Comments: June 2025

Received from Rick and Connie Baird, Medical Lake residents – June 5, 2025

The comment lays out the needs for the short and long term. Specifically, the individual identified replacing roads along Lakehurst, Granite, and Freeman due to the damage from tree removal trucks/equipment.

They continued, identifying emergency access roads along the lake are necessary, but specified that a permanent thoroughfare would disrupt the status quo. Another long-term need is the implementation of water and sewer lines, removing current septic systems, and paying for the connection fees for impacted residents.

Received from Barbara Shields, Medical Lake resident – June 5, 2025

The individual detailed their experience of evacuating the Gray Fire, which was inhibited due to being on crutches. The comment detailed how the homeowner lost their home and is experiencing significant difficulty rebuilding. The homeowner is on limited money and is expected to run out of funds before the home is rebuilt.

The comment detailed debris removal, lawn replacement, and asphalt replacement are needed. She continued by stating that she wanted to remain in her current spot and not be moved into the Medical Lake boundaries.

Received from Jeff and Connie Urness, Medical Lake residents – June 4, 2025

The individual lost their home in the Gray Fire and expressed their gratitude for the progress made, including the mayor's support. Their top priorities are full reconstruction of damaged roads such as Lakehurst Dr and Lakeview Ct, along with support for the proposed sewer and water upgrades on the west side of Silver Lake. They also requested various walking paths to improve pedestrian safety and proposed creating an alternative road behind their neighborhood to reduce traffic near the Bible Camp.

An anonymous comment received on June 5, 2025

The comment asked questions including whether there are plans to put houses above Freeman Dr, and if Freeman will connect to Lakehurst Dr via road.

Received from Burt L. Edwards, Medical Lake resident – June 5, 2025

The individual laid out their recovery priorities which included removal of burnt trees, landscaping needs such as shrubs and grass, and fencing.

Received from Carmen J. Berg, Medical Lake resident – June 5, 2025

The individual identified various items needing repaired or replaced on their property including irrigation, landscaping, a pergola replacement, railings, debris cleanup, and reimbursement for work done so far. All items had an associated “ballpark” figure for costs.

Received from Diane Henderson, Medical Lake resident – June 5, 2025

The comment supported prioritizing roads, water, and sewer services. She noted that the camp had managed road and water needs but would prefer not to continue doing so. She asked what it will cost homeowners to connect to a new sewer system and what will happen to existing septic infrastructure like her current above-ground evaporation system. She also mentioned ongoing needs such as a garage, deck, landscaping, and a shop. Additionally, she opposed adding street lighting, saying residents value the dark night sky.

Received from Ted and Susan Broadway, Medical Lake residents – June 3, 2025

The comment began by acknowledging that major infrastructure changes are likely. Their main concerns included ensuring that all costs related to connecting to future water and sewer systems, including removal of existing septic systems, are fully covered. They are seniors on fixed incomes.

They continued, stating that enforcing cleanup of unsafe and unsightly debris should be required. Additionally, the homeowner described creating a reimbursable fund to help fire victims complete remaining rebuilding projects. They also opposed streetlights so residents can continue enjoying the night sky.

Received from Joe and Sue Shelley, Medical Lake residents – June 5, 2025

The homeowners expressed their gratitude for the recovery efforts that have occurred so far. Their top concern is repairing the extremely damaged condition of Lakehurst Drive, which is difficult and painful for them to navigate due to serious back injuries. They supported the proposed plan to connect the neighborhood to Medical Lake's water and sewer system, including utility burial and drainage improvements, but requested that all hookup costs and removal of existing septic systems be reimbursable to reduce current financial strain. They continued, asking the county to enforce cleanup of neighboring lots filled with hazardous debris and to establish a reimbursement fund for remaining rebuilding needs.

Received from Roxanne and James Edison, Medical Lake residents – June 3, 2025

The commenter described the severe impacts of the Gray Wildfire and the financial and emotional strain of rebuilding. They emphasized that they were underinsured, denied FEMA assistance, and burdened with significant out-of-pocket expenses for essential repairs. They expressed frustration with the complex insurance process and government paperwork. They continued, stating there was a lack of support for those who technically had insurance but were still left with significant needs.

Their primary needs include reconstructing Lakehurst and Granite Dr, which is severely damaged and filled with potholes. It was recommended to have the entire road repaved by professionals. They indicated their support for implementing utilities such as water, sewer, and broadband, detailing how these upgrades are critical for public safety and obtaining or maintaining homeowners' insurance.

Finally, the comment described the process of having property taxes lowered. The homeowner, including many other impacted residents, experienced unclear guidance leading to large denial rates for their community. The individual urged Spokane County to remedy the situation and provide relief. She concluded by stating it feels as though people are not being prioritized over money and process, hoping recovery efforts improve.

Received from Stand and Lisa Johnson, Medical Lake residents – June 5, 2025

The commenter supported using a portion of the recovery funds to extend water and sewer services to Silver Lake. They requested that the project includes reconstruction of key roads (Granite Dr, Lakehurst Dr, and Lakeview Dr) and involved the creation of an additional access route for multiple evacuation paths. They also asked that funds be used to clean up properties that were abandoned, including potential asbestos mitigation to protect surrounding homeowners.

Received from Carmen Berg, Medical Lake resident – June 10, 2025

The comment explained that the online survey provided through the HCD Department was not compatible with the individual's email. They asked to be included in future communication and meetings involving recovery efforts.

Received from Allie Zachariades, Medical Lake resident – June 11, 2025

The individual explained how they were an uninsured renter impacted by the fires. They described how they are in long-term temporary housing in the city and are hoping to buy land in Medical Lake or North of Spokane. They reached out to see if some of the disaster recovery funds could be used for well construction and other support to assist with obtaining permanent housing.

Summary of Public Comments: 30-Day Public Comment Period 6/12/25 – 7/14/25

Received from Terri Cooper, Medical Lake resident – July 9, 2025

The comment described CDBG-DR funds available may only be used for recovery needs caused by disasters. The Action Plan should reflect the ongoing needs of the community and facilitate a quicker recovery. The individual stated that identifying the entire county as the 'most impacted and distressed area' would be inaccurate, adding that targeted areas for long-term recovery should be addressed.

They continued, identifying that CDBG-DR funds are not to be used for general fund projects or to supplant other funding sources. Therefore, none of the funds should be spent on any projects outside the disaster impacted communities.

The commentor illustrated how the Action Plan uses FEMA data to calculate housing need and does not seem to account for public feedback or the impact of insurance settlements. The funding allocations did not match the input from the community. Additionally, funds requested by the City of Medical Lake and the SRLTRG are not reflected within the plan.

For remaining needs, the individual identified various projects. For mitigation, slash piles, hazard tree removal, tree replanting, and code enforcement availability for neighbors with dangerous trees or nearby properties with toxic debris were described. In terms of infrastructure, private and public road restoration, storm water mitigation, and the need for utilities such as water and sewer along Silver Lake were included. Additionally, they detailed the need for broadband, emergency access roads, and fire hydrants. Finally, the comment outlined the financial need for home rebuilding and legal aid.

HCD Response: Thank you for the information and suggestions. HCD intends to utilize all CDBG-DR funding for only survivors of the Oregon/Gray Rd Wildfires. HCD used public input to craft general proposed activities but has not allocated any dollars at this time. Future amendments will require engagement with the community and determining activity considerations. Additional data will help our plan meet the unmet need as it becomes available. The suggested 'funding requests' in the comment are reflected in the plan as narratives and may become funded activities in future iterations of the plan.

Received from Darla Torno, Medical Lake resident – July 9, 2025

The commentor opposed utilizing $2 million for administrative support stating all funds should go to fire recovery. She suggested those funds should go directly to the SRLTRG to prevent funds from not going to the fire victims.

HCD Response: Thank you for your comment. Spokane County staff will attempt to save on administration costs where possible to ensure most of the resources go toward assisting survivors of the disaster. County staff intend to work with a system navigator such as the Recovery Group to facilitate resource allocation in an efficient manner that will prevent waste, fraud, and abuse.

Received from Nelsonmdt, an AOL address on Android – July 10, 2025

The commenter explained that the wildfire drastically damaged the local environment and community. They stressed that the grant funding is essential and that key needs include rebuilding damaged roads, adding sewer and water infrastructure, installing fire hydrants, and creating evacuation routes. These improvements would protect both residents and the health of Silver Lake.

HCD Response: Thank you for your comment. Infrastructure, especially in the Silver Lake area, has been a prominent area of interest to the community. HCD staff will be looking into the eligibility and proposed project details to see what types of activities could be done in the area.

Received from KF Carpenter, Medical Lake resident – July 10, 2025

The individual described the need for removing dead trees and replacing them with responsible replanting efforts. They added that Lakehurst Dr has been significantly damaged and needs repair.

HCD Response: Thank you for your comment. HCD has recognized dead tree removal and replanting as a significant priority. We appreciate you informing us of the road's condition and will take that into consideration.

Received from Kim Lynch, Medical Lake resident – July 10, 2025

The comment described her support for the addition of water and sewer infrastructure along Silver Lake. She continued, adding that Lakehurst Dr and Granite Dr need to be rebuilt. This would improve air quality due to lowered dust being kicked up. The homeowner added that code enforcement, especially on vacant properties, needs to be addressed as there are property owners who have done nothing to clean up.

The commentor finished by hoping Freeman and Lakehurst are kept as dead ends rather than through streets over the concern traffic speeds would increase. She suggested a gate could be placed if the roads are connected.

HCD Response: Thank you for your comment. We will investigate potential infrastructure projects in the Silver Lake area. Code enforcement activities will also be taken into consideration through future iterations of the Action Plan.

Received from Kaye Peterson, Medical Lake resident – July 10, 2025

The commentor stated that recovery efforts should not discriminate regarding who and what help is received. They lost their home in the Gray Fire and iterated the need for water services and a loop road along Silver Lake's west shore. This would add fire hydrants and increase the likelihood for affordable home insurance. The continued, describing the need for evacuation routes and potential for sewer and broadband services to be brought into the area.

They highlighted ongoing safety concerns including large slash piles, beetle-damaged trees, hazardous debris, and damaged private roads. They also call for stormwater mitigation, replanting, code enforcement, and gravel support. The commenter was appreciative of steps taken so far and urged the county to prioritize fire impacted areas.

HCD Response: Thank you for your comments and sharing your story. The CDBG-DR funds will go toward long-term recovery efforts for survivors of the wildfires. We will consider the proposed infrastructure project and investigate the eligibility of multiple projects in the described area. HCD intends to have a

program that will remove dead trees and slash piles from people's properties along with a replanting program to prevent further soil erosion. We appreciate the information provided and your compliments.

Received from Cindy Thompson via voicemail, Elk resident – July 14, 2025

Excerpt summarized from voicemail left to HCDInfo:

Cindy was part of the Elk fire. She noted that those from the Gray Fire have elected representatives whereas Elk does not. She wanted to know if there was an allotment for how much is going to each community of the $44 million or if it was simply whomever was the loudest. She noted that Elk does not have access to city electricity/water. It seemed to her that Medical Lake is trying to get an expansion of utilities where it did not previously exist, and such a project does not seem like it addresses the victims of the fire but rather provides revenue for the city [of Medical Lake]. She stated that it should be up to the city [of Medical Lake] to provide those utilities, not from the awarded $44 million. Additionally, she wanted to know what is going on with getting rid of the slash piles, noting it would cost her $8k to get rid of the slag on her property and stated that number is little in comparison to some neighbors.

HCD Response: Thank you for your comment. None of the $44 million has been allotted to each community. An assessment of remaining unmet need will be performed during the grant's life cycle and will evaluate resource allocation based upon that data. We appreciate your concern for an infrastructure project in Medical Lake and will take it into consideration. HCD intends to have a program that will remove dead trees and slash piles from people's properties which should alleviate the fire hazard.

Summary of Public Comments: 30-Day Public Comment Period 3/12/26 – 4/13/26 (Version 2)

Received from Sonya Sievers, Medical Lake resident – March 23, 2026

The following is a summary of a presentation provided to HCD:

The comments included allude to certain points in Spokane County's Action Plan regarding the implementation of water/sewer infrastructure. Specifically, the individual detailed that some of the homes burned and/or destroyed in Medical Lake had fire hydrant access available.

The individual described how she and other homeowners refused annexation by the City of Medical Lake and were told that water and sewer fees would be higher unless they agreed to be annexed. The proposed 2019 Comprehensive Plan attempted to add Freeman Drive to the UGA which

was opposed by the homeowners living in the area. Homeowners could see costs such as $30K in hook-up fees and remediating septic systems-wells.

Additionally, according to the 2019 Comprehensive Plan, Medical Lake does not have adequate water supply for additional homes. She explained that water is obtained via the City of Spokane through an Intertie Agreement, charging county properties at one and a half times the normal rate.

The individual pointed to ethical concerns due to the EWA Bible Camp purchasing additional acreage in 2024 in anticipation of enabling development. She claimed the benefactors of running sewer and water along the West shore of Silver Lake would be the Bible Camp and City of Medical Lake, not the 240 homeowners impacted. She stated that funds for this grant should be used to assist individuals devastated by the fires.

She identified that Spokane County's original public comment period for the first Action Plan included 20 responses, of which 16 were residents of the Bible Camp, 1 was the Mayor of Medical Lake, and only 1 was from an Oregon Rd. Fire survivor. She reiterated a public comment noting that Medical Lake seems to be expanding utilities and not addressing victims of the fires.

The individual discussed that there is confusion on where to obtain information and notifying survivors of public comment opportunities. Finally, she stated that the priority for the disaster funds should be for homeowners who lost homes and/or personal property and should be available for anyone impacted by the fires.

HCD Response: Thank you for your comment. Spokane County has not allocated any funds to a specific infrastructure project at this time and will critically evaluate all future proposals. HCD will evaluate outreach efforts and other ways in engaging the community to ensure greater public participation in available opportunities such as programming and future amendments.

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Summary of Public Comments: 30-Day Public Comment Period 10/9/26 – 11/9/26 (Version 3)

*To be entered and included at the conclusion of the comment period.

Citizen Complaints

Citizens wishing to make a complaint or file a formal grievance related to certain activities, applications, or planning documentation of any HCD programs may submit a written complaint or grievance to HCD at any time. Please submit formal complaints to HCDInfo@spokanecounty.org and make sure to note the requested resolution to the complaint. HCD staff will respond to all formal complaints and grievances

within 15 working days. The County will accept written citizen complaints related to CDBG-DR-funded programs, the Action Plan, substantial amendments, or quarterly performance reports.

Modifications to the Action Plan

Substantial Amendment

Over time, more information regarding the unmet needs of the community and program allocations will change. Thus, Spokane County will amend the disaster recovery action plan as often as necessary to best address long-term recovery needs and goals. As programs and activities develop over time, an amendment may not be triggered if the program or activity is consistent with the descriptions provided in this plan. When there are changes to the sections of this Action Plan that rise to the level of requiring an amendment, HCD will do the following:

- Ensure the current version of the Action Plan is accessible for viewing as a single document, with all amendments;
- Identify the amendments by highlighting added or changed content;
- Include tables that clearly illustrate where funds are being moved;
- Include a revised budget table that reflects all funds applicable to the amendment.

All substantial amendments shall follow the requirements set forth in the HCD CPP. Each version will be noted in the Record of Amendments section of the Action Plan and posted on the Disaster Recovery webpage. Citizens will be provided with no less than thirty (30) days to review and comment on the proposed substantial amendment. A change to this Action Plan is considered to be a substantial amendment if it meets the following criteria:

- A change in program benefit or eligibility criteria;
- The addition or deletion of an activity;
- A reallocation that constitutes a change of 25% or greater of a program budget;
- Changes and updates to the overall benefit percentage, changes in program benefit or eligible criteria, or a proposed reduction in the overall benefit requirement, or;
- An update to the submitted Action Plan if the original submission was incomplete.

Any additional comments received during the open public comment period, along with their associated HCD responses, will be posted on the HCD Disaster Recovery website jointly with the official HUD-approved amendment.

Nonsubstantial Amendment

A non-substantial amendment is an amendment to the plan that includes technical corrections, clarifications, and budget changes that do not meet the monetary threshold for substantial amendments. These changes will be dealt with administratively by the HCD staff and the BOCC where appropriate.

While a nonsubstantial amendment to the plan does not require posting for public comment, HCD staff will still post the most current version of the plan on the Disaster Recovery website for no less than 30 days and notify the HCDAC. Spokane County shall notify HUD within five (5) business days before the change is effective.

Performance Reports

Spokane County HCD will be required by HUD to submit a Quarterly Performance Report (QPR) throughout the lifespan of the program, approximately six (6) years. HCD will utilize all available information such as the review guide, available checklists, and technical assistance where appropriate to complete the report. Additional guidance and training will be applied for team members for optimal performance and meeting minimum requirements.

HCD will post all QPRs onto the Disaster Recovery website under the Planning Documents section: Planning Documents | Spokane County, WA. These QPRs will be available for the public to view all activities currently funded and their associated performance. Narratives and expended funds during that quarter shall provide a transparent overview of the grant award. Additional information regarding QPRs may be amended in this section.

Appendix

Certifications

A. **Uniform Relocation Act and Residential Anti-displacement and Relocation Plan** – The grantee certifies that it:
    1. Will comply with the acquisition and relocation requirements of the Uniform Act, and implementing regulations at 49 CFR 24, as such requirements may be modified by waivers or alternative requirements;
    2. Has in effect and is following a RARAP in connection with any activity assisted with CDBG-DR grant funds that fulfills the requirements of Section 104(d), 24 CFR 42, and 24 CFR 570, as amended by waivers and alternative requirements.

B. **Authority of Grantee:** The grantee certifies that the Action Plan for disaster recovery is authorized under state and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG-DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations as modified by waivers and alternative requirements.

C. **Consistency with the Action Plan** – The grantee certifies that activities to be undertaken with CDBG-DR funds are consistent with its action plan.

D. **Citizen Participation** – The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in waivers and alternative requirements). Also, each local government receiving assistance from a state grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in waivers and alternative requirements).

E. **Use of Funds** – The grantee certifies that it is complying with each of the following criteria:
    1. Purpose of the funding. Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the most impacted and distressed areas for which the President declared a major disaster pursuant to the Stafford Act (42 U.S.C. 5121 et seq.);
    2. Maximum Feasibility Priority. With respect to activities expected to be assisted with CDBG-DR funds, the Action Plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families;
    3. Overall benefit. The aggregate use of CDBG-DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent (or another percentage permitted by HUD in a waiver) of the grant amount is expended for activities that benefit such persons;

4. Special Assessment. The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG-DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless: (a) disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or (b) for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).

F. **Grant Timeliness** – The grantee certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements applicable to the use of grant funds.

G. **Order of Assistance** – The grantee certifies that it will comply with the statutory order of assistance listed at Appendix C paragraph 9 and will verify if FEMA or USACE funds are available for an activity, or the costs are reimbursable by FEMA or USACE before awarding CDBG-DR assistance for the costs of carrying out the same activity.

H. **Affirmatively furthering fair housing** – Each jurisdiction is required to submit a certification that it will affirmatively further fair housing. This includes certification that the grantee will affirmatively further fair housing, consistent with §§ 5.150 and 5.151 of this title.

I. **Anti-lobbying** – The jurisdiction must submit a certification with regard to compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by that part.

J. **Section 3** – The jurisdiction must submit a certification that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u), and implementing regulations at 24 CFR part 75.

K. **Excessive force** – A certification that the jurisdiction has adopted and is enforcing:
    1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
    2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from, a facility or location that is the subject of such non-violent civil rights demonstrations within its jurisdiction.

L. **Compliance with anti-discrimination laws** – The jurisdiction must submit a certification that the grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601-3619), and implementing regulations.

M. **Compliance with lead-based paint procedures** – The jurisdiction must submit a certification that its activities concerning lead-based paint will comply with the requirements of part 35, subparts A, B, J, K, and R of this title.
N. **Compliance with laws** – A certification that the jurisdiction will comply with applicable laws.

Waivers (if applicable)

CDBG-DR grantees that are subject to the Consolidated Notice, as indicated in each Federal Register notice that announces allocations of the appropriated CDBG-DR funds ("Allocation Announcement Notice"), must comply with all waivers and alternative requirements in the Consolidated Notice, unless expressly made inapplicable. At this time, Spokane County has not identified waiver requests associated with its proposed activities.