# TABLE OF CONTENTS

CITY OF BOISE

<table>
<thead>
<tr>
<th>Exhibit/Attachment</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>EXHIBIT A: EXECUTIVE SUMMARY</td>
<td>2</td>
</tr>
<tr>
<td>EXHIBIT B: THRESHOLD &amp; OTHER SUBMISSION REQUIREMENTS</td>
<td>3</td>
</tr>
<tr>
<td>EXHIBIT C: NEED</td>
<td>4</td>
</tr>
<tr>
<td>EXHIBIT D: SOUNDNESS OF APPROACH</td>
<td>12</td>
</tr>
<tr>
<td>EXHIBIT E: CAPACITY</td>
<td>26</td>
</tr>
<tr>
<td>EXHIBIT F: MATCH OR LEVERAGE</td>
<td>30</td>
</tr>
<tr>
<td>EXHIBIT G: LONG-TERM EFFECT</td>
<td>31</td>
</tr>
<tr>
<td>ATTACHMENT A: ADVANCING RACIAL EQUITY</td>
<td>33</td>
</tr>
<tr>
<td>ATTACHMENT B: AFFIRMATIVE MARKETING</td>
<td>35</td>
</tr>
<tr>
<td>ATTACHMENT C: AFFIRMATIVELY FURTHERING FAIR HOUSING</td>
<td>36</td>
</tr>
<tr>
<td>ATTACHMENT D: ELIGIBLE APPLICANT</td>
<td>37</td>
</tr>
<tr>
<td>ATTACHMENT E: EVIDENCE OF PARTNERSHIP LETTERS</td>
<td>38</td>
</tr>
<tr>
<td>ATTACHMENT F: MATCH OR LEVERAGE DOCUMENTATION</td>
<td>39</td>
</tr>
<tr>
<td>ATTACHMENT G: APPLICATION CERTIFICATIONS AND STANDARD FORMS</td>
<td>40</td>
</tr>
<tr>
<td>ATTACHMENT H: SUMMARY OF COMMENTS RECEIVED &amp; COMMENTERS</td>
<td>41</td>
</tr>
</tbody>
</table>
EXHIBIT A: EXECUTIVE SUMMARY

CITY OF BOISE

For many years, Boise has consistently topped national lists that name the City as one of the most livable in the country. Among these livability characteristics, housing affordability has long been included as one of the City’s greatest assets for current and new residents alike. However, in a trend that became broadly visible just before the COVID-19 pandemic but was already being acutely experienced by our lowest-income residents, including those experiencing homelessness, the City has become increasingly costly to afford to live in, largely because of skyrocketing housing prices that have far outpaced what has amounted to comparatively marginal wage growth. This change in our housing market has deeply impacted residents with low and moderate incomes and has further emphasized the importance of preserving existing affordability whenever possible, while recognizing that many residents are also being faced with significant challenges potentially preventing them from remaining in their existing homes.

This PRICE applications outlines a series of programs and projects that would significantly increase housing stability, preserve affordability, and support many of the City’s most vulnerable residents. These activities would ensure that existing residents of manufactured housing communities have resources to make needed accessibility, resilience, and safety improvements to their homes so they can remain stably housed; prospective owners can access support to help them achieve homeownership; and owners of manufactured home communities can maintain the infrastructure to ensure longevity and affordability for parks and their residents.

These proposed activities are rooted in the City’s firm commitment to creating a welcoming, livable, and equitable place where residents have services and resources that create opportunities and allow each household to access the housing that best suits their needs and goals.
EXHIBIT B: THRESHOLD REQUIREMENTS
CITY OF BOISE

Civil Rights Matters: The City of Boise does not have any outstanding civil rights matters at the time of application.

Applicant type: 02 (City of township government) – City of Boise City, Idaho

Number of Applications: The City intends to submit one application, for the PRICE Main program.
EXHIBIT C: NEED
CITY OF BOISE

The City of Boise is applying for PRICE Main funding.

**Project Area and Need for Affordable Housing**

All projects and programs proposed within this application will be offered within the City of Boise.

The City of Boise has an acute demand for affordable housing that has made national news numerous times in the last handful of years, including being rated as the sixth-fastest growing city in the U.S. in 2023-24 by U.S. News & World Report,¹ alongside being named the least affordable housing market in the U.S. following a 2021 Oxford Economics study² (only Vancouver, Canada was found to be less affordable in North America). The study concluded that Boise’s home prices were 72% above what a median-income household could afford and called Boise “the most rapidly increasing [Housing Affordability Indices] of any metro in our U.S. projections.”

To educate our City elected officials and to understand exactly where to invest limited resources, the City periodically completes a Housing Needs Analysis. This report was most recently updated in 2024. The analysis evaluates housing demand, supply, vacant and underutilized land, demolition trends, special needs populations (e.g., people experiencing homelessness, students, and resettled refugees), and the cost of development. In order to provide a ten-year housing needs projection, population projections, age and condition of existing housing inventory, overcrowding, households experiencing homelessness, housing supply changes, and construction trends are analyzed.

**Findings:**

- Housing demand continues to remain high; 2,019 new or significantly renovated units are needed each year, and 47% of the demand is for units affordable to households earning less than 80% of the Area Median Income. In Boise, 51% of households earn less than 80% AMI.
- New construction within City limits is falling short of the projected annual need.
- Specialized populations continue to have specific needs, which are not being met in the traditional housing market.
- Housing need is not allocated evenly across income brackets and renters are almost

¹ [https://realestate.usnews.com/places/rankings/fastest-growing-places](https://realestate.usnews.com/places/rankings/fastest-growing-places)
always more cost-burdened than owner-occupants; 44.7% of households that rent are paying 30% or more of their household income for housing alone.

**Conclusions:**

- Over the next ten years, Boise needs 15,512 new housing units. Additionally, 4,682 units will need significant rehabilitation to remain safe, decent, and sanitary. Most of the demand for new units comes from projected population growth (64% of total need), homelessness accounts for approximately 9% of the need, and overcrowding accounts for 3% of the need.
- Over the next ten years, 8,919 of the 15,512 new units needed must serve households at or below 80% AMI.

**Construction costs have continued to rise. From 2021 to 2024, the estimated cost to build a single-family home in Boise has risen from $230,000 to $325,000 (a 41% increase). This trend, which mirrors national construction cost increases, means that the total gap in**
financing for affordable units in Boise is nearly $3 billion over a 10-year period.

In addition to the conclusions of our 2024 Housing Needs Analysis, we also know that between 2017 and 2020, the average rents in Boise increased by 19% and from 2020 to 2021, the average rents increased by nearly 26%. In fact, in 2020, Boise saw the highest rent increase in the nation. Although rents have decreased slightly (3.7%) over 2023, the multifamily vacancy rate at the end of 2023 was 1.81% and Idaho is ranked the 4th most expensive US state for renters. Further exacerbating the crisis, Boise incomes did not increase at the same rate, and the decrease we are beginning to see in rents does not overcome or account for the unprecedented increases seen before and during the pandemic.

An Idaho Statesman article published October 2022 analyzed data from the U.S. Census Bureau, the Bureau of Labor Statistics, and Intermountain Multiple Listing Service (MLS) and found, “In February 2012, the median price of an Ada County home was $158,000. By February 2017: it was $256,600, up 62.4%. Five years later, in February 2022, it was $549,900. That’s a 114.3% increase from 2017 and a 248% increase from 2012. Meanwhile, the median household income in Ada County was $53,909 in 2012. By 2017, it was 12.9% higher — $60,858. Now, Roeser [an Idaho Department of Labor economist] estimates the median household income at $77,272 (a 27% increase from 2017), based on 2019 data adjusted using the Employment Cost Index, a federal survey of employer payrolls to monitor changes in employee compensation. So, in the past five years in Ada County, home prices have increased 4.2 times faster than incomes. In the past 10, they increased 5.7 times faster. The median house now costs seven times as much as the median income, compared with 2.9 times in 2012 and 4.2 times in 2017.”

The Boise Regional Realtor’s March 2024 Market Report identified a single-family home median sales price of $555,000 in Ada County, a 14.4% increase from March 2023. The First-Time Homebuyer Affordability Index published by the National Association of Realtors (NAR) found that a household would need a qualifying income of $101,760 and a downpayment of $33,290 in order to purchase a home for $332,900 at the end of 2023. However, for most lower-income households, these statistics offer little hope for attaining homeownership — the qualifying income cited by NAR represents almost 120% AMI in Boise and the median amount most households

---

5 https://www.weknowboise.com/rental-market-vacancy-rates.php

earning under $71,300 (80% AMI in Boise) have in savings is $10,000. To further exacerbate the situation, there were zero single-family homes and only 6 condos listed for sale in Boise under $330,000 as of May 14, 2024.

Manufactured housing currently offers one of the only attainable, affordable homeownership opportunities available for Boise residents – the same search of properties for sale under $330,000 offered 34 results for manufactured homes. However, securing financing often presents a challenge for those seeking to purchase a manufactured home. In a recent community survey conducted as part of the City of Boise’s Annual Action Plan development, 64.57% of respondents reported downpayment assistance for home buyers as the most needed housing-related service for Boise.

A further concern is redevelopment of manufactured housing sites as owners opt to forgo property maintenance and instead sell their land to developers, frequently leading to displacement of residents. In 2007, the Boise State University College of Social Sciences and Public Affairs produced a report, “Mobile Home Living in Boise: its uncertain future and alarming decline” which included a survey of existing manufactured housing at the time – finding that 5,412 residents were occupying 2,706 manufactured homes, in 50 mobile home parks. At that time, the report found 63% of the mobile home residents were renting their lots (twice the national average) and in the time between 2001 – 2007, park closures had forced more than 1,300 evictions. Between 2005 to 2007, 315 households had been forced to abandon their mobile homes or relocate.

In 2016, an Idaho Statesman article noted that the widespread disappearance of mobile home parks predicted in the 2007 BSU study had not occurred, “Simmons [Boise Planning Director] pointed out that the Great Recession struck shortly after BSU released its mobile home study, and the threat to trailer parks seemed to fade a little. Since the study came out, he said, Boise has lost only two parks [resulting in a loss of 52 housing units.] ‘There’s been a fear about the threat of closure of mobile home parks for many, many years. And mostly that threat hasn’t materialized,’ he said. Still, Simmons said, Boise leaders should ‘absolutely worry about’ the future of trailer parks now that Boise’s real estate market is roaring again. ‘We’re not trying to push them out,’ he said. ‘But we also recognize that there are some that are in pretty bad shape.”

A recent data analysis of parcels listed as Mobile Home/RV Parks by the Ada County Assessor identified 50 manufactured housing sites, although not all are necessarily formal Manufactured Home Communities. Altogether, the parcels represent 3,271 spaces, some individually owned, but the vast majority under the ownership of a business entity. The 2022 American Community Survey data estimates that there are 4,423 mobile homes in Boise. Within the landscape of housing affordable to households at lower incomes within Boise, manufactured housing represents a

---

11 As listed on Zillow.com
significant asset – nearly twice the number of deed restricted units in the community. An analysis of affordable rental properties within the City identified 1,899 Low Income Housing Tax Credits (LIHTC) units, 160 units of Public Housing operated by the Boise City/Ada County Housing Authority, and 205 units of housing owned and operated by the City of Boise. Additionally, the City has provided financial assistance for homebuyers – currently there are 78 homes with affordability requirements restricting occupancy and any future sales.

Within the State of Idaho, there are at least two resident-owned communities, however none are within the City of Boise. Of the sites identified in the Assessor’s data, only two are known to be owned by non-profit or public entities.

In 2022, a 26-space manufactured housing community called Sage Mobile Home Park (Sage) was listed for sale. This property is adjacent to a key corridor that connects downtown Boise with the Boise Airport; given its size and potential for redevelopment, the City determined that without action, the Sage residents were likely to be displaced, and thus stepped in and purchased the 2-acre park.

Communities that Meet Distress Criteria

Sage is located in Census Tract 17.02, which qualifies as an economically distressed CDFI Investment Area. Within Tract 17.02, per the CDBG Fund SIMS Mapping Tool data, the poverty rate is 20.3% and the Median Family Income is $57,307 (74% of the Metro Median Family Income and 68.6% of the national Metro Area Family Income). As will be discussed further in the Soundness of Approach exhibit, Sage Mobile Home Park has critical infrastructure repair needs, which the City intends to address through the PRICE Program to ensure long-term safety and affordability for residents.

In addition to Sage, a mapping analysis of manufactured home communities in Boise identified 20 other locations that also qualify as economically distressed CDFI Investment Areas. Many of the proposed investments outlined in this application could be undertaken in these areas, including critical infrastructure repairs, deferred maintenance, and purchase of parks at risk of redevelopment.

Resilience in Disaster-Prone Areas

The City of Boise’s Climate Risk Report identifies four main climate risks: Extreme Heat, Wildfire, Drought, and Flooding. Only one manufactured housing community within Boise City limits is also within a Community Disaster Resilience Zone, as identified by FEMA. The National Risk Index for Census Tract 105.03, where that Manufactured Housing Community is located, is 98.05 (Very High). Wildfire is the highest risk factor (99.9 – Very High), followed by Heat Wave with a Relatively High score (81.2).

---

14 U.S. Department of Treasury. CDFI Fund CIMS Mapping Tool.  
The City, in its own mapping analysis, overlayed Floodplain maps with manufactured housing locations, identifying two communities potentially at risk – one within the 0.2% Annual Chance Flood Hazard area and one within the 1% Annual Chance Flood Hazard area.

Boise has a goal of enhancing community resilience and our local ability to adapt to climate change impacts. The community must prepare for and respond, recover, and adapt to climate change impacts such as increased frequency of heat stress days, more heavy precipitation days, increased irrigation demands, extended drought, more poor air quality days, shifts in stream flows and threats to water quality. As part of this application, the City proposes to expand its Home Improvement Program with a branch specifically focused on manufactured homes. Through that program, income-eligible households would be eligible for grants to address weatherization, energy efficiency, and repairs to critical systems (HVAC, plumbing, electrical). Additionally, the City intends to ensure that tree planting efforts through its City of Trees Challenge include manufactured housing communities.

**Barriers to Preservation or Revitalization**

After a multi-year effort that included significant community engagement, in June 2023 the City adopted a new, modern zoning code that entirely replaced the former, 60+ year old code that nearly exclusively catered to single-family homes in residential zones. The new code seeks to optimize the City’s land use by encouraging a variety of housing types and increasing residential density across the City.

The previous code had numerous regulatory barriers that limited or encumbered the ability of developers to respond to the City’s increased housing demand on limited available land. These limitations included large minimum lot sizes, height limits and arbitrary density limits. The updated zoning code allows developers to produce lower-cost housing types, such as accessory dwelling units, missing middle housing (duplexes to fourplexes), and multifamily housing by increasing permitted density, removing or reducing parking requirements, permitting by-right housing types in all residential zones, and streamlining the review and public process for specific housing developments. Further, the new zoning code mapped and rezoned high-opportunity areas to increase development capacity and neighborhood livability.

The key barrier that still exists for the City that needs to be addressed to produce and preserve more affordable housing is the availability of financing and subsidies for affordable housing. A 2019 National League of Cities report\(^\text{15}\) found that Idaho is the only state in the country that does not have any of the housing affordability tools available, at least to some degree, in every other state in the country.

- The state restricts the City’s ability to require inclusionary zoning or set rent control.
- Idaho provides no state funding for housing. The state has no funded housing trust funds or state tax incentives. An attempt to provide a property tax exemption for affordable housing projects at the legislature in the 2023 session did not gain traction.

---

\(^{15}\) National League of Cities “Local Tools to Address Housing Affordability: A State-by-State Analysis”.
• The City cannot implement an anti-displacement program or require replacement of naturally occurring affordable housing impacted by privately financed development.

• Local governments in Idaho do not have the authority to levy the taxes and fees that are often used to fund affordable housing in other states, such as local option taxes, fees on new construction and demolition, real estate transfer taxes, and document recording fees.

• The City cannot implement an anti-displacement program or require replacement of naturally occurring affordable housing impacted by privately financed development.

Owners of manufactured housing communities in Idaho are only required to provide 15 days of notice to a resident association before a park is sold, making resident organizing to compete to purchase extremely unlikely. In addition, given the significant increases in land costs over the past several years, as well as the historically low rents paid by manufactured housing community residents, even if an offer can be made in time, securing financing that that will result in a competitive offer while also not resulting in unaffordable monthly housing costs to residents is incredibly challenging. While some of our neighboring states have made funding available to support residents or other entities in making purchases financially feasible, no such state-level funding is available in Idaho. The 2007 Boise State University report on manufactured housing communities found that only 21% of communities had a homeowner’s association. The communities that the researchers considered to be at the highest risk of imminent closure were the least likely to have a homeowners association (only 4% did), while 89% of communities that the report considered low risk had one.

The City’s Analysis of Impediments to Fair Housing Choice completed in 2021 identified home lending practices as an impediment, specifically because of disparities in home purchase loan denial rates when analyzed by race/ethnicity. Applicants of a non-white race were denied at a rate of 16.3% compared to 11.4% of white applicants. Hispanic/Latinx applicants were denied at a rate of 17.4%. These data points include neighboring Canyon County but signify a systemic issue and barrier for households seeking to access homeownership’s generational wealth building opportunity.

The 2022 American Community Survey data estimates that 9.1% of Boise’s total population identifies as Hispanic or Latinx (of any race). Local trends follow national lending disparities - even after controlling for economic factors such as debt-to-income and loan-to-value ratios, Latinx borrowers are still denied loans at greater rates than White applicants.16 While many households have found manufactured housing to be more attainable, chattel lending is less regulated than traditional mortgage financing, often comes at a much higher interest rate, requires higher credit scores, and offers no protection from repossession should a borrower enter default. When considering these combined factors, accessing any type of financing to purchase a manufactured home represents a significant barrier for low-income households, and even more so for non-white households.

The BSU report also included a survey of residents, which found that 48% of respondents reported at least one physical disability and more than half were over the age of 60. This data aligns with the PRICE NOFO research and highlights the high likelihood that existing residents of

manufactured housing may need assistance to complete accessibility improvements within their homes, alongside infrastructure and broadband improvements to ensure access to resources and services while remaining in their homes.

Additionally, 82% of survey respondents were white, 9% were Native American, and 4% were Hispanic/Latino (although the researchers noted that they believed this to be an underreporting of the actual number, based on their observations in the communities surveyed). At that time, Boise’s total population was 97.6% white, 0.9% Native American, and 3.6% Hispanic/Latino. This disproportionate representation of disabled, older, Native American, and Hispanic/Latino residents in manufactured housing communities in Boise indicates that these groups may lack access to safe and healthy affordable housing in the broader housing market, as a result of discrimination and lack of opportunity. The City’s 2021-2025 Consolidated Plan’s Needs Assessment further identified that Black/African American, Asian, and Hispanic households were disproportionally more likely to live in housing with severe problems (lacking complete kitchen and/or plumbing facilities, overcrowding, and/or being cost burdened). Severe housing problems were most likely to be experienced by households with extremely low incomes.
EXHIBIT D: SOUNDNESS OF APPROACH

CITY OF BOISE

Project Description, Management, and Impact

The City of Boise’s mission is to create a city for everyone, and one of the City’s strategic priorities is ensuring that there is an affordable place to live for anyone who chooses to call Boise home. In order to do that, the City’s investments in housing production and preservation are based around four elements: 1) centering the most marginalized, 2) targeting resources where resources are needed most, 3) embracing Housing First, and 4) approaching affordability holistically.

Recognizing that manufactured housing is a vital component to the housing inventory for residents, the City’s PRICE application seeks to support current and future manufactured home residents, providing resources for park owners in exchange for resident protections, and preserve affordability within existing parks. The City anticipates achieving these goals by expanding currently existing programs to cater specifically to the unique needs of manufactured housing residents and by implementing new initiatives, in partnership with local funding institutions and non-profit organizations.

The specific activities that the City intends to implement, and corresponding budget requests are outlined here, with further explanation regarding actions, timeline, and eligibility below.

<table>
<thead>
<tr>
<th>Topic</th>
<th>Activity</th>
<th>Budget Request</th>
</tr>
</thead>
<tbody>
<tr>
<td>Support for Current Manufactured Housing Residents</td>
<td>Establishment of a grant program for rehabilitation of existing manufactured homes</td>
<td>$7,000,000</td>
</tr>
<tr>
<td></td>
<td>Eviction prevention and housing counseling</td>
<td>$1,530,000</td>
</tr>
<tr>
<td>Resources for Prospective Homeowners</td>
<td>Financial assistance to purchase new manufactured homes</td>
<td>$3,250,000</td>
</tr>
<tr>
<td></td>
<td>Homeownership counseling scholarships</td>
<td>$2,000</td>
</tr>
<tr>
<td>Preservation of existing manufactured housing communities</td>
<td>Funding for infrastructure repairs/upgrades &amp; acquisition of Manufactured Housing Communities to preserve affordability</td>
<td>$50,000,000</td>
</tr>
<tr>
<td>Revitalization of the Sage Mobile Home Park Community</td>
<td>Repairs to critical infrastructure</td>
<td>$4,685,000</td>
</tr>
<tr>
<td></td>
<td>Installation of new manufactured homes on currently empty spaces</td>
<td>$780,000</td>
</tr>
<tr>
<td></td>
<td>Opportunities for replacement of pre-1976 homes</td>
<td>$4,300,000</td>
</tr>
<tr>
<td>Administration</td>
<td>Costs related salaries and contracts to administer programs</td>
<td>$1,893,401</td>
</tr>
<tr>
<td></td>
<td><strong>Total</strong></td>
<td><strong>$73,440,401</strong></td>
</tr>
</tbody>
</table>

Support for Current Manufactured Housing Residents

The City intends to work alongside residents of manufactured homes to ensure that all residents are living in safe, decent, and sanitary conditions. Additionally, the City recognizes that some
residents may be interested in modifying their housing situation or may be facing instability and would benefit from housing mobility counseling and eviction prevention services.

- Establishment of a grant program for rehabilitation of existing manufactured homes

The City has operated its Home Improvement Program to support homeowners earning less than 80% of the Area Median Income in need of repairs to the critical systems, safety issues, and accessibility since the late 1970s. While manufactured homes are currently eligible under the existing program, the program has limited capacity due to available CDBG funding and maintains a significant waiting list. Funding through the PRICE program would be administered through the City’s existing systems and procedures but would be available specifically to residents of manufactured homes. This activity directly addresses the need to rehabilitate older units identified in the City’s Housing Needs Analysis and also the need demonstrated by the ongoing influx of applications and considerable waitlist for the established program. It meets the National Objective of benefitting low- and moderate-income persons (specifically via the Housing activities described at 24 CFR 570.208(a)(3)) and Section F.2.c.i.(a) and Section 4.2.c.iv.(a) of the getPrice NOFO.

Building off the City’s existing program’s policies, households receiving funds through the PRICE program would sign documents outlining the period of affordability and requirement to maintain the home as their primary residence throughout that term, which are then recorded in the Ada County property records and serve to restrict the use of the property. Households under 50% AMI would be eligible to receive the funds in the form of a forgivable loan, reduced incrementally over the 15-year period of affordability. Households between 51-80% AMI would be eligible to receive funds in the form of a very low interest loan, with a minimum repayment term matching the 15-year period of affordability. Income generated from loan payments would be returned to the fund to support additional households in need of repairs.

The City’s current program is supported by a Grants & Loans Analyst, who assists homeowners in completing applications, verifies income eligibility, and coordinates necessary documents. Then the Rehab Coordinator works with the homeowner to determine the repairs necessary, develops a scope of work, and manages the bidding process to secure contractor(s) for the project. The Rehab Coordinator continues to serve as a liaison between the homeowner and the contractor(s) throughout the project, ensuring the work is completed in a timely manner and to the appropriate standards and managing invoices or issues that may arise.

Through the PRICE Program, the City intends to hire additional Rehab Coordinators to focus specifically on projects for manufactured homes built after 1976. Owners of manufactured homes would apply through the existing system but would be referred to a separate list specifically to be assisted through the PRICE program funds. Eligible types of rehabilitation work would include: accessibility improvements (interior and exterior), energy efficiency/resiliency improvements (weatherization, replacement of windows & doors, insulation), installation or repair/replacement of critical systems (heating, cooling, plumbing, electrical), repair/replacement of exterior elements (roofs, siding, skirting, ramps/entrances), and interior repairs needed to ensure the home is in safe, decent, and sanitary condition.
Based on information from the City’s existing program, it is anticipated that each home is likely to need between $30,000 - $40,000 for rehabilitation. On average, replacement of roofs is trending between $13,000 - $15,000, replacement or installation of HVAC systems is $9,000 - $12,000, and repairing and replacing windows is averaging $800/window. The majority of manufactured homes assisted through the City’s existing program over the last three years have needed a combination of these types of repairs.

Given the systems and processes that are already in place, the City is confident that this specific activity could begin immediately upon receiving funding and could serve approximately 200 households over the grant’s period of performance.

The budget requested for this activity in total is $7,000,000. This would pay for approximately $35,000 in rehabilitation costs for each of the 200 households the City anticipates serving.

- Housing Counseling and Eviction Prevention

The City works closely with many non-profit organizations serving low to moderate income persons throughout the community. In particular, the need to prevent eviction for low to moderate income households has seen high demand, especially since the Emergency Rental Assistance funding through the U.S. Treasury has now been exhausted. Manufactured housing residents are particularly vulnerable to space/lot rent increases, as property managers recognize many do not have the resources to move their trailers and are therefore faced with either forgoing other necessities to pay the rent or abandoning their asset and potentially facing homelessness.

Through this PRICE application, the City intends to provide funding to local non-profit organizations to support eviction prevention work, which includes financial assistance to help income-eligible households get caught up on back-rent and payments owed alongside case management and landlord mediation to assist households in achieving long term stability. An analysis of services provided by the organization currently providing eviction prevention services for Boise residents identified approximately 15-30 applications each month being submitted by residents of manufactured housing who were actively being evicted (residents who had a 3-day notice in hand, or a court date).

Beyond ensuring that households have stable and safe housing, the City recognizes the importance of housing mobility and ensuring that residents have available options so they can access the housing type that best suits their household’s needs. A recent survey of residents within the City-owned Sage Mobile Home Park revealed that over half of the residents would prefer that their housing situation change. Therefore, as part of this PRICE application, the City intends to utilize funding to provide Housing Mobility Counseling for the residents at Sage Mobile Home Park in particular. Counseling would be provided through a community partner and also made available to income-qualified manufactured housing residents throughout the City, utilizing its partner network to share information about the availability of the resource.

These activities respond directly to the needs of manufactured housing residents identified in the 2007 Boise State University study and the numerous articles discussed regarding the instability manufactured housing residents face and the shortage of resources available to meet these specific needs. The activities meet the National Objective of benefitting low- and moderate-income persons.
(specifically via the Limited Clientele activities described at 24 CFR 570.208(a)(2)) and Section F.2.c.v.(b & c) of the PRICE NOFO.

The City would begin the process of implementing these services upon award, first working through the process of identifying the most appropriate service provider, then executing subrecipient agreements. Based on the time it takes on average to establish subrecipients and agreements, the City anticipates that service provision could begin within the first six months following an award of funds.

The budget requested for these activities over the grant’s period of performance is $1,530,000. This funding would be granted to subrecipient organizations with the expertise to offer services to manufactured housing residents throughout the community.

**Resources for Prospective Manufactured Housing Homeowners**

Recognizing that the financing tools available to support the purchase of a manufactured home vary significantly from the standard financing mechanisms for stick-built units, the City intends to expand its current Homeownership Opportunity Program to better support households seeking the opportunity to own a manufactured home.

- **Financial Assistance for Manufactured Housing Homeownership**
  The City currently operates a homeownership assistance program, which provides CDBG funding to assist in the purchase of manufactured homes. However, the program has limited funding available, and currently operates on a first come first served basis for applicants, regardless of housing type. Funding through the PRICE program would operate as a specific set-aside for income-eligible applicants seeking to purchase an existing (newer than 1976) manufactured home, replace a pre-1976 manufactured home with a newer model, or purchase and/or install a new manufactured home.

Homeownership assistance is offered as a mortgage at a zero-percent interest rate, with no payments due until the time of sale or transfer. The homebuyer signs a Promissory Note and Homebuyer Written Agreement outlining the terms of the assistance and repayment expectations at the time of purchase and a lien is filed with the Department of Motor Vehicles to prevent sales or transfers without City knowledge. The Homebuyer Written Agreement outlines the Period of Affordability and remains in effect even if the homeowner should choose to pay off their loan early. The Period of Affordability will be determined by the amount of assistance provided, in compliance with 24 CFR 92.254(a)(4). When the home is sold or transferred, the City’s investment is repaid from the proceeds of the sale, plus a percentage of the appreciation on the home’s overall equity, if applicable. Operating the program as a revolving fund allows the City to reinvest the funding for new applicants when loans are paid off. All homeownership program participants are required to maintain the assisted home as their primary residence, which is verified annually by the City’s Compliance team.

For homeowners in manufactured homes or trailers older than 1976, the City intends to offer an option to replace the old unit with a new manufactured home. PRICE funds would be used to buyout the existing home (showing as a credit for the buyer on the transaction to finance the new
manufactured home) and also provide a grant to the homeowner to cover the cost of removal of the existing unit and any preparation to the site needed before a new unit could be installed. The City is also exploring non-traditional repayment options, including a lease-to-own model for those who may need to rebuild their credit or finances as they work towards becoming homeowners.

Utilizing the City’s existing homeownership program framework, the City anticipates that advertising and program implementation could begin at the time of grant award.

These activities respond directly to the need for additional units of affordable housing in Boise, the specific challenge regarding real vs personal property financing identified in the PRICE NOFO, and also the direct feedback from the community regarding the need for homeownership assistance.

These activities meet the National Objective of benefitting low- and moderate-income persons (specifically via the Limited Clientele activities described at 24 CFR 570.208(a)(2)) and Section F.2.c.iii. and Section F.2.d.&e. of the PRICE NOFO.

The budget requested for these activities is $3,250,000. With these funds, the City anticipates assisting a minimum of 25 homebuyers over the grant’s period of performance. Working with partner organizations throughout the community to refer homebuyers, existing City staff will complete eligibility verification and underwriting, complete transactional documents, and process funding.

- Homeownership Counseling Scholarships
  The importance of homeownership counseling is widely recognized by the City and its partners working in the affordable homeownership area. Completion of a HUD-approved homeownership counseling course provided by a HUD participating housing counseling agency is already a requirement of the City’s homeownership assistance program. The City intends to continue to make counseling a requirement for all households receiving homeownership assistance through the PRICE program funds, but also recognizes that the cost of the course may present a barrier for some households. Therefore, the City intends to implement a program to offer scholarships to income-eligible households to pay for the cost of the homeownership counseling course.

  The City anticipates that this program could be offered alongside the financial assistance for homeownership, at the time of PRICE Program award.

  This activity meets the National Objective of benefitting low- and moderate-income persons (specifically via the Limited Clientele activities described at 24 CFR 570.208(a)(2)) and Section F.2.c.v.d. of the PRICE NOFO.

  The budget requested for this activity over the grant’s period of performance is $2,000. This funding would be used to pay for the Finally Home!™ course offered by HUD-approved counseling agencies in Boise for income-qualified households interested in purchasing a manufactured home.
**Preservation of Existing Manufactured Housing Communities**

The City of Boise has seen significant growth over the last decade, which has put pressure on the local housing options for residents, especially those at lower income levels. As the city has grown, available land for new development has become scarcer, and thus prices for land have increased. Unfortunately, this creates an incentive for owners of mobile home communities to consider selling their land, resulting in the displacement of residents in many cases. Alongside this pressure, a lack of options for many manufactured housing residents has put much of the power in the landowner’s hands; given that most residents are unlikely to have the resources to move, often routine maintenance and infrastructure repairs are forgone in favor of increased profits, knowing that the residents are very unlikely to decide to leave of their own accord.

With funding through the PRICE Program, the City would develop a revolving loan fund to support an array of activities that would preserve and enhance manufactured housing communities. Owners accepting a loan through the PRICE program would enter into a Period of Affordability (POA) based on the purpose and amount of funds loaned\(^\text{17}\), enforced via a recorded Affordability Covenant or Memorandum of Restrictive Covenants filed with Ada County.

During the POA, the owner would not be allowed to sell the property to an entity that would change the use, space rent could not be increased by more than 5% annually and cannot exceed 30% of the household’s gross income, and the owner would also be required to implement a policy instituting a one-year renewable lease term, unless there is good cause for non-renewal, and identify an administrative complaint procedure for residents. Additionally, the owner would be required to adopt tenant site lease protections consistent with those required by Fannie May or Feddie Mac, if not already in place.

The budget requested for this activity over the grant’s period of performance is $50,000,000. This funding would be used for financing to be loaned to MHC owners for repairs or acquisition.

- Infrastructure repairs/upgrades

Recognizing that some park owners are likely to have deferred maintenance or infrastructure repairs/upgrades that they would be willing to complete if affordable financing was available, the City intends to offer very low interest loans to owners willing to commit to continued ownership and protections for residents.

Applications would be accepted for repairs to walkways, roads, and pathways to improve accessibility for residents, upgrades to critical infrastructure systems (including utility meters and hookups), installation of broadband infrastructure, and enhancements to promote disaster resiliency (including firewise/xeric landscaping and flood mitigation).

For these projects, the City would provide the support of a construction project manager to coordinate the bidding process, compliance with the applicable cross-cutting regulations, manage invoices, and ensure communication between all parties.

\(^{17}\) The minimum POA will be 15 years for all projects. If more than $100,000 in funds is approved, the minimum POA will be 30 years. Purchase of a MHC with PRICE funds = 50 year minimum POA.
The City anticipates that the application for this program could be developed and opened within the first year of a PRICE Program award.

This activity meets the National Objective of benefitting low- and moderate-income persons (specifically via the Area Benefit activities described at 24 CFR 570.208(a)(1)) and Section F.2.c.ii. of the PRICE NOFO.

- Financing for purchasing Manufactured Housing Communities
The City intends to support the preservation of existing Manufactured Housing Communities (MHCs), prevent resident displacement, and support resident empowerment through making funding available to entities to purchase existing MHCs.

The City would accept applications for financing from non-profit entities, resident associations, or for-profit entities willing to be bound by the program’s terms for a minimum period of 30 years.

The City anticipates that the application for this program could be developed and opened within the first year of a PRICE Program award.

This activity meets the National Objective of benefitting low- and moderate-income persons (specifically via the Housing activities described at 24 CFR 570.208(a)(3)) and Section F.2.c.iii. of the PRICE NOFO.

**Revitalization of the Sage Mobile Home Park Community**

In August 2022, the City purchased the Sage Mobile Home Park community, in order to preserve affordability and stability of housing for its residents. The park consists of 26 home sites on a 2.02-acre parcel. Originally developed as a Mobile Home Community in 1962, the homes in the park date from 1963 to 1977. The City intends to preserve the Sage community as an affordable housing option, however funding through the PRICE Program is needed to ensure the park and homes within it remains functional and safe for residents.

- Critical Infrastructure Repairs
The City contracted with an engineering firm to have a Utility Analysis report completed in 2023. The report identified variances in how utility billing is handled (some spaces pay the provider directly and others pay a flat portion to the City) as well as concerns regarding the age of the infrastructure. Upon inspection, most water meters were found to be inaccurate, if working at all, and the existing underground power and water systems were estimated to be nearing the end of their useful life, with potential for failure to occur.

Funding through the PRICE Program would be used to repair these critical systems. Specifically, the existing master electrical meter (currently located on one of the resident spaces) would be relocated and fenced in to ensure access for personnel as needed and improve safety and the overall appearance of the park for residents. Additionally, new underground conduits and connectors would be installed, and each space would have its own, new power meter. The water mains and connections for each unit would also be replaced, and each unit would have a new water meter installed. These improvements will ensure the longevity of the park while also ensuring accuracy of utility billing for the tenants.
The City would identify a construction project manager to support the overall coordination of these projects. While improvements are being made, the City anticipates some interruption to utilities for residents, and has built temporary relocation costs into the project budget. The City has experience managing resident displacement via its internal property management team that operates over 300 units of rental housing throughout the City. There is a hotel located 800 feet from the park, with which the City has an existing relationship and frequently uses in situations that require tenants to be away from their units due to utility interruptions or other work within their units.

The City anticipates that work could begin on infrastructure repairs within the first 8-12 months of a funding award, depending on the time of year that awards are made. Initial steps would be to develop a full scope of work and specifications before the project could be put out to bid through the City’s procurement process. Construction would occur in phases, coordinated to minimize resident displacement.

This activity meets the National Objective of benefitting low- and moderate-income persons (specifically via the Area Benefit activities described at 24 CFR 570.208(a)(1)) and Section F.2.c.ii. and Section F.2.c.v.a. of the PRICE NOFO. The budget requested for this activity is $4,685,000. The funding would be used for construction and temporary relocation costs. If PRICE funds are awarded for Sage Mobile Home park, the City intends to record a Memorandum of Restrictive Covenants on the property, ensuring a minimum of 50 years of affordability. Installation of new manufactured homes on currently empty spaces.

At the time the City purchased Sage Mobile Home Park, there were three empty spaces. By the end of 2024, it is anticipated that 3 additional spaces will have become vacant and the homes on those sites removed. The City intends to use PRICE Program funds to purchase and install new manufactured homes on the six vacant spaces.

The City anticipates that this activity would begin immediately after the infrastructure repairs are completed – within two years of the funding being made available. The City’s construction manager would coordinate the purchase and installation of the units.

This activity meets the National Objective of benefitting low- and moderate-income persons (specifically via the Housing activities described at 24 CFR 570.208(a)(3)) and Section F.2.c.iii.f. and Section F.2.d. of the PRICE NOFO.

The budget for this activity is $780,000, which anticipates an average cost of $130,000 to purchase and install six new manufactured homes.

- Opportunities for replacement of pre-1976 homes
A resident survey conducted at Sage Mobile Home Park identified that more than half of the residents would prefer that their housing situation change and many also indicated that their home does not currently meet their household’s needs or is in need of repairs. The City recognizes that there are likely a variety of preferences regarding housing and is seeking to make multiple options available for existing residents, however given the age of the units, rehabilitation through the PRICE program is not allowed.
Any resident interested in selling their home to the City would be offered a payment roughly equivalent to the average sales price of similar mobile homes in the area. If the household would like to remain in the park, they would have the option to move into one of the new manufactured homes purchased and installed in an empty space, or have their existing home removed and a new unit installed on their current space. The new units would be offered as either rental, lease to own, or homeownership opportunities, depending on each individual household’s preference. Buyout funds could be used as a downpayment for the new unit. The City would offer flexible terms, either deferring all payments until sale or transfer, or collaborating with the resident to identify a payment option that would keep their total housing costs equivalent to no more than 30% of their household’s income. If the new units are purchased as affordable homeownership or lease-to-own opportunities, loan documents and a written agreement would be recorded with the county, ensuring the unit is maintained as the household’s primary residence throughout the period of affordability, established in compliance with 24 CFR 92.254(a)(4).

The City anticipates that this activity would begin in coordination with the infrastructure repairs that the park needs. Residents interested in replacing units will be identified during initial project scoping and the units will be removed and replaced immediately after utility construction is completed, minimizing the duration of displacement for residents. The City’s construction manager would coordinate the purchase and installation of the units.

This activity meets the National Objective of benefitting low- and moderate-income persons (specifically via the Housing activities described at 24 CFR 570.208(a)(3)) and Section F.2.c.iii.f., Section F.2.c.v.a., Section F.2.d., and Section F.2.e. of the PRICE NOFO.

The budget for this activity is $4,300,000 which anticipates an average cost of $130,000 to purchase and install twenty new manufactured homes, buyouts for existing residents, costs for storage of residents’ belongings during replacement, and demolition and removal of existing pre-1976 trailer homes.

**Administration**

In order to administer the programs and activities outlined in the application, the City anticipates needing to hire contract positions, dedicating a percentage of existing staff’s time toward these projects and programs, and costs for necessary equipment and software. Three contract positions would be needed for the duration of the grant’s period of performance – two Housing Rehab Coordinators and one Construction Project Manager. The Housing Rehab Coordinators would be responsible for completing inspections, work-write ups, handling bidding processes, managing contractors, and handling invoices for rehabilitation of 200 homes over the six-year period. The Construction Project Manager would oversee the repair of critical infrastructure, installation of new manufactured homes, and demolition/removal of other manufactured homes (as needed) at Sage Mobile Home Park, as well as managing contractors for other repair projects identified via the revolving Preservation Loan Fund. Each position is anticipated to be funded annually at $90,000 for the grant’s period of performance.

The City’s existing staff would be used to handle the annual planning and reporting for the grant’s term, as well as marketing of programs, development of application materials, review of
applications received, document preparation, loan/grant origination and eventual servicing, and compliance with cross-cutting federal regulations and longer term monitoring. The City anticipates annually funding 20% of the HCD Loans and Grants Analyst position ($97,194), 15% of the HUD Specialist position ($90,829), and 10% of the HUD Program Manager position ($73,008) throughout the grant’s period of performance. Additional staff time spent by the HCD Senior Manager, HCD Project Coordinator, HCD Operations Manager, HCD Compliance Manager, and HCD Compliance Specialist would be offered as leverage, with all costs being paid from City general funds.

In addition to staff to administer and implement the identified programs and activities, the cost of equipment ($5,370 for laptops, monitors, docking stations, keyboards, and mice for three contract positions) and software ($7,000) to accept project applications and administer funds is included in the funding request.

### Implementation Timeline

The City has a proven track record of deploying unique fund sources rapidly, seeking to ensure the resources are available within the community to meet critical needs when need is the highest.

Once grant awards have been determined and agreements signed, the City will work expeditiously to develop its PRICE Action Plan, conduct public participation, and submit the plan to HUD. The City’s Compliance Specialist will begin completing the necessary Environmental Reviews for the activities awarded.

Once the administrative requirements of the award acceptance have been met, within the first six months the City will:

- Implement a manufactured-housing specific list of home repair/rehab projects.
- Begin the hiring process for contract employees to manage manufactured-housing-specific rehab projects (current staff will manage these projects and train contract staff until full capacity is reached).
- Solicit partner agencies to manage eviction prevention and housing mobility counseling projects via a competitive process.
- Begin marketing the availability of homeownership assistance for prospective manufactured home owners.
- Ensure HUD-certified homeownership counseling agencies are aware of the City’s scholarships for Homeownership Counseling available to prospective manufactured home owners.
- Begin the hiring process for a construction project manager to manage the Sage Infrastructure project.

Within the first year of program implementation, the City will:

- Develop Policies and Procedures for the Manufactured Housing Preservation Loan Fund (assisting in infrastructure repairs or acquisition of MHCs).
- Develop and open an application for funds awarded through the Manufactured Housing Preservation Loan Fund.
- Develop the scope of work and specifications for the utility upgrades at Sage Mobile Home
Park and begin the process of competitively procuring a construction firm to do the work.

- Host individual meetings with all Sage residents to determine their preferred outcome regarding the options to remain in their current home, rent/lease/buy a new home in the park, or sell their home to the City and move out of the park.

By the end of the first year of program implementation, the City anticipates that all outlined activities will have been started and will be meeting the needs outlined in this application. The City recognizes that this is an ambitious timeline but has also proven its ability to meet aggressive goals, as indicated through its deployed of CARES, HOME-ARP, ERAP, and SLFRF funds over the past four years (discussed further in the Capacity Exhibit).

**Impact**

If funded is approved for the activities outlined, the City anticipates the following impacts:

- Improvements to safety, accessibility, and climate resilience will have been made for 200 households currently residing in manufactured housing, ensuring the preservation of those homes within the community’s housing stock.
- Sage Mobile Home park will be preserved for a minimum of 50 years, to continue serving as an affordable housing option for 26 households.
- The households currently residing at Sage Mobile Home park will have the opportunity to access housing counseling, better housing mobility, and be offered access to new manufactured housing units.
- Manufactured housing residents will have access to increased eviction prevention funding and case management resources to ensure future housing stability and prevent displacement and/or potential entrance into the City’s unhoused population.
- Funding will be available to support homeownership for residents seeking to buy a manufactured home, alongside no cost homeownership counseling services.
- Funding will be available to improve infrastructure at existing manufactured housing communities, allowing existing communities to remain viable housing options while ensuring residents have better protections against space rent increases.
- Funding will be available for the acquisition of manufactured housing communities, ensuring that residents within those communities have stability and long-term protections in place.

**Affordability and Equity**

The City’s strategy of ‘A Home for Everyone’ is resident-focused and resident-centered, recognizing that there is a variety of housing types and ownership options that may best suit each household. The City strives to provide housing options across that spectrum, preserving affordability and improving conditions for existing units, supporting opportunities for households to achieve homeownership, and offering resources to assist in the development and construction of both rental and homeownership products. All activities proposed within this application for PRICE funds are targeted for households at or below 80% AMI, and the various activities have affordability periods identified within each description that meet the requirements of the PRICE NOFO.
Funds that are loaned to owners of manufactured housing communities will have terms of acceptance outlined in the loan documents that specifies protections for residents, including:

- Adoption of tenant site lease protections consistent with those required by Fannie May or Feddie Mac.
- Limitation on space rent increases to no more than 5% annually.
- Limitation on space rent to not exceed 30% of the household’s gross income.
- Requirement for the owner to implement a policy instituting a one-year, renewable lease term (unless there is good cause for non-renewal).
- Identification of an administrative complaint procedure for residents.

The City also recognizes that homeownership is a goal for many households, and intends to use PRICE funding to expand its existing Homeownership Opportunity Program to provide opportunities for residents interested in purchasing a manufactured home. The funding offered through this program would be available to households at or below 80% AMI intending to buy an existing (post 1978) or new manufactured home. Existing homes would be required to pass an inspection to ensure the home is in safe, decent, and sanitary conditions.

Eviction prevention and housing case management will also be offered, specifically for residents of manufactured housing, using PRICE funding. Through the case management process, households will also be connected with services and resources as needed to ensure long term housing stability. These same resources will be made available to households served through the home rehabilitation program or referred from partner organizations.

Infrastructure projects exceeding $200,000 will trigger Section 3 requirements, which will provide economic opportunities for low-income individuals. The City is familiar with implementing projects in compliance with the updated Section 3 requirements, and will ensure any contractors working on these projects implement all best practices for recruiting and retaining Section 3 workers.

**Environment and Resilience**

Boise faces four main climate risks: extreme heat, wildfire, drought, and flooding. Boise is directly impacted by extreme heat almost every year, which can cause heat-related illnesses such as heat exhaustion or heat stroke. Boise is one of the fastest-warming metropolitan areas in the country and will face an increased frequency of extreme heat days. This results in impacts to human health, increased energy use, disrupted natural ecosystems, and impaired water quality. In order to mitigate the effects of extreme heat, housing rehabilitation projects will have a specific focus on ensuring each home has appropriate heating and cooling systems, and adequate electrical wiring and infrastructure to handle the energy use of those systems. Additionally, the Housing Rehab Coordinators will provide residents with information about utility assistance and level pay programs offered by the local utility providers and service agencies so residents will know how to access those programs if needed. Weatherization activities (replacing windows/doors, installing insulation, and similar projects) will also be a priority for housing rehabilitation projects.
The Boise community has also been directly impacted by wildfires in the past, including the 2008 Oregon Trail Fire (which destroyed 10 homes, damaged 11, and claimed one life) and the 2016 Tablerock Fire (which resulted in 2,500 acres of wildlife habitat and one home destroyed). Additionally, the community is indirectly impacted by smoke associated with burns in neighboring forests, as well as fires across the State and the Western U.S. These fires impact local air quality and can cause property damage and ecosystem impacts. The City maintains specific landscaping requirements for areas in the Wildland-Urban Interface (WUI) and the Boise Fire Department maintains a proactive collaboration with community members and other public agencies to inform and protect the community from future wildfires.

The City has experienced several declared droughts, and these conditions can be linked to other threats such as wildfire, poor water quality, and lack of food security. Additionally, water is closely connected to Boise’s electricity supply as the energy provided by Idaho Power is sourced from 17 hydroelectric plants, making up the utility’s largest source of generation. This risk is expected to increase in the future. Any infrastructure projects funded through the PRICE program that include street or landscaping will be required to implement improvements consistent with approved xeric and waterwise landscaping, as outlined in the City’s zoning code.

Boise periodically experiences impacts associated with heavy precipitation and flooding events. This can lead to erosion, and landslides. An increase in heavy precipitation events and flooding will result in property damage, and lowered water quality due to erosion. Two manufactured housing communities in Boise are within floodplain areas. Through the PRICE program, the City intends to make funding to improve resilience for these communities available for the property owners, alongside recommendations regarding the types of improvements that would best protect residents from future flooding events.

The City of Boise recognizes the need to move quickly and embraces the opportunity to take bold steps to address climate change. To help inform climate equity principles, the City of Boise is developing the Clean City Index -- a distributional environmental justice, health and equity baseline. The goal of this assessment is to understand where there are disparities in access to environmental and health amenities or disproportionate exposure to environmental health hazards that tend to impact frontline communities. The information collected will cover proximity to hazards and sensitive land uses, health risk and exposure, and social, health and climate vulnerabilities. The data will include parameters such as air, noise pollution, flooding, extreme heat, distance from green spaces, and health facilities. In addition, the distribution of amenities such as tree canopy cover, parks, open spaces, sidewalks, bikeways, and walkability will be included. The Clean City Index will produce a geographic-based indication of environmental justice and equity in the community and identify areas of the city that could benefit from additional focus and investment. This tool will be utilized to identify opportunities to target assistance from PRICE-funded programs for manufactured housing residents.

Community Engagement

The City intends to lead broad, community-wide advertising of the opportunities to access PRICE funding for home improvement, eviction prevention, financial assistance for homeownership, and
homeownership counseling. Beyond sharing information via the City's newsletter and social media accounts, specific outreach to underserved community members will be undertaken to ensure awareness of resources and programs. All program/resource information will be translated into Spanish (and any additional languages upon request), and the City will utilize its Language Access Program Manager and Community Engagement team to share information with hard-to-reach community members via Spanish language radio, at community events, in branch libraries, through its network of partner agencies serving limited English proficient and/or low to moderate income community members, and with other lending agencies.

The City also plans to share information about programs with the property managers, community resident organizations, and owners of manufactured housing communities via informational brochures, attending community meetings, and in-person discussions. Door-hanger brochures will also be delivered within manufactured housing communities to advertise the opportunities for home improvements.

In preparation for implementation of the proposed revolving loan program for manufactured home community acquisition and infrastructure repairs, the City intends to convene focus groups of stakeholders to provide input on the application process, funding terms, and other related requirements. These stakeholders will be solicited from local development groups, affordable housing advocates, fair housing practitioners, CDFIs, and other lending agencies. The City’s past experience in hosting collaborative conversations around program development has resulted in highly-utilized, efficient programs that help partners around the table collectively achieve their shared goal of supporting low-to-moderate income community members.

Similarly, the City intends to solicit feedback and input from low to moderate income community members, specifically residents of manufactured housing communities, regarding the ways programs and activities can be best adapted for better accessibility and use throughout the community.

The proposed activities and programs outlined in this application align with Boise’s comprehensive plan, Blueprint Boise, and with the policies codified in the new Modern Zoning Code. They also support the City’s strategic housing goals of preserving and creating new affordable housing within the community.
EXHIBIT E: CAPACITY

CITY OF BOISE

Experience Managing Projects

The City of Boise has extensive experience developing, administering, and managing projects of all types and sizes. Within the organization there are staff with expertise ranging from project management, construction coordination, engineering, drafting site plans and scopes of work, managing contractors and subcontractors, and appropriately accounting for all funding sources and requirements from local, state, and federal agencies. The infrastructure projects proposed in this application are well within the scope of activities routinely handled by the City’s Public Works staff, and their expertise will be utilized in the implementation of the project if awarded.

Rehabilitation projects for low-to-moderate income households are also well within the scope of work routinely managed by City staff, through the City’s existing Home Improvement Program. This program has been in existence for decades and is easily scalable with the addition of Housing Rehab Coordinators (as proposed in this application) to increase capacity. The City already has a software program and processes in place to manage the program, and will continue to utilize these well documented, efficient systems.

Similarly, the City has decades of experience offering assistance for homeownership and will continue to utilize its existing system and process for applications, underwriting, and coordination with partners and real estate professionals involved in these transactions.

Experience Managing Grant Funds

The City of Boise has been an entitlement community receiving, and successfully administering, Community Development Block Grant funds since the program’s development under the Housing and Community Development Act of 1974. Similarly, the City has been administering the HOME Investment Partnerships Program funding it receives as a participating jurisdiction since 1992, when the first appropriations were authorized under Title II of the Cranston-Gonzalez National Affordable Housing Act of 1990. In the time since these first entitlement grants were received, the City has also been awarded funding under several other HUD programs, including the Rental Rehabilitation Grant Program, CDBG Recovery Funds from the American Recovery and Reinvestment Act and the Housing and Economic Recovery Act of 2008, HOME’s American Dream Downpayment Initiative, the Homeless Prevention and Rapid Re-Housing Program and, most recently, CDBG-CV funds allocated under the CARES Act and State and Local Fiscal Recovery Funds (SLFRF), Emergency Rental Assistance (ERA), and HOME-ARP funds allocated from the American Rescue Plan Act.

Federal funds received from HUD are administered by the City’s Housing and Community Development (HCD) Division. This team has significant experience in deploying federal resources in a timely manner to meet community need. When the CARES Act was passed in March 2020, the HCD team amended its Annual Action Plan, opened a competitive grant application, made award determinations, and began actively funding projects and drawing from its CDBG-CV allocation in July 2020. Boise received additional re-allocated funds and the entirety of the CDBG-
CV funds received ($1,792,938.00) were invested to support community need with all funding fully drawn by September 30, 2023. Likewise, the City of Boise was among the first communities to have its HOME-ARP Allocation Plan approved and began spending those funds in October 2023, with the expectation they will be fully expended by the end of Fiscal Year 2028. Working in partnership with the local Public Housing Authority, $43M in rental assistance was provided from the Treasury’s ERA funds between February 2021 – July 2023. An additional $6.7M in ERA-2 funds were invested to support the development of 191 affordable units. Finally, the City has conditionally awarded $10.5M in SLFRF (to date) towards the construction of 95 units of Permanent Supportive Housing and 200 units of housing affordable to households at or below 80% AMI. We expect these funds to be officially obligated and expended by Fall 2024, well before the obligation deadline of December 2024 and the expenditure deadline of December 2026.

Key Staff

Over the past three years, the HCD team has refined roles, added three new full-time staff, and streamlined its processes for administering, implementing, and monitoring the federal grants and programs funded with federal resources to ensure the City is able to maximize the impact federal funds can have in addressing the housing crisis and community need. This existing team would be responsible for administering the PRICE Program funds, including compliance with cross-cutting federal regulations and long-term monitoring.

City and HCD leadership will provide strategic direction and general oversight of the programs and projects implemented. Additionally, they manage relationships with external organizations and partner agencies.

- Senior Manager, Division of Housing and Community Development: Maureen Brewer
- Mayor’s Housing Advisor: Nicki Hellenkamp

HCD’s Operations team will manage the day-to-day administration and management of the projects and programs identified in this application.

- HCD Operations Manager - Melinda McGoldrick: responsible for development of programmatic policies, management of Operations team and contract staff, coordination between teams, and compliance with all NOFO requirements.
- HUD Program Manager - Nikki Drake: responsible for development of Action Plans, performance reporting, fair housing and affirmative marketing.
- HUD Specialist - Carlos Velazquez: responsible for subrecipient agreements and reporting, assistance with marketing and outreach efforts, and long-term loan servicing.
- HCD Grants and Loans Analyst – Debbie Sanine: responsible for providing assistance with program applications, verifying income eligibility, underwriting, document preparation, and review of subrecipient funding draws.
- HCD Compliance Manager – Danny Bell: responsible for managing annual monitoring for subrecipients, completing risk assessments, and managing all aspects of compliance.
- HCD Compliance Specialist – Michael Johnson: responsible for compliance with all cross-cutting federal regulations for federally-funded projects, including Section 3, Davis Bacon, Environmental Reviews, and occupancy verification.
Housing Rehab Coordinator – Ron Garvin: responsible for providing training to contract employees regarding housing rehabilitation projects, including work write ups, bidding processes, and general compliance with program processes and requirements.

Other City staff will provide administrative and internal service support for activities funded through the PRICE program.

- Senior Staff Accountant – Stephanie Jensen
- Grants Accountant – Deanne Alexander
- Attorney IV – Mary Grant

As needed, additional City staff may support specific elements of projects or programs, including the Municipal Facility Program Senior Manager, the City’s Senior Engineer, the HCD Project Coordinator, and communications and outreach staff from the City’s Office of Community Engagement.

Experience Promoting Racial Equity

The City of Boise has a strong commitment to creating a city for everyone, where everyone feels, and is, safe and welcomed. A cornerstone of that commitment is actively planning events and community engagement that focuses on including the most impacted community while getting input from residents, especially when programs or services are meant to support traditionally underrepresented communities.

Examples of this commitment are evidenced by initiatives and projects throughout the organization, including:

- Two city owned and operated cultural sites that honor members of our community. The James Castle House was the residence of renowned deaf and non-verbal artist, James Castle. The Erma Hayman house honors Boise’s historically Black neighborhood and was established in partnership with members of Erma Hayman’s family and members of Boise’s Black community.
- Prior to allocating nearly $10 million in ARPA funding to community projects, we conducted a series of listening sessions with traditionally underrepresented communities, including Boise’s refugee community and others, to best understand community needs and respond in kind. ARPA dollars were then allocated to mental health, food security, childcare and more in direct response to the feedback we received.
- Boise has been recognized officially as a Welcoming City since 2019.
- We established a Community Accessibility program to bring more residents who live with disabilities into decisions made about the accessibility of city facilities, programs and services. In response we have created a 5.3 mile trail loop for users of all mobility types in our foothills, have involved the community in accessibility decisions in our downtown core, adding ramps and safe navigation to street improvements and developed meaningful internal training and guidance on how to best support all residents.
- We recently revamped our child care licensing system, including community stakeholders (child care providers) – including members of the refugee community – in the design
process.

- The City formalized a language access program that is translating vital documents into our top languages (in Boise, they are Spanish, Swahili and Arabic) and have created “I Speak” cards and a comprehensive guide for front line staff to best interact with residents with limited English proficiency.

Experience Completing Environmental Reviews

As a Responsible Entity, the City has extensive experience conducting Environmental Reviews. The HCD Compliance Specialist has completed the WISER modules available on the HUD Exchange, as well as the Part 58 training offered by the Seattle Field Office in 2023 and more recently in June 2024, and more specialized training on lead, radon, and other hazards. Given that the City frequently invests its funding from HUD in development of new rental housing, the HCD Compliance Specialist has completed numerous Environmental Assessments, the Tier I review for the Home Improvement Program, review for projects awarded through Community Project Funds grants, and annually completes the lower-level reviews required for public service activities, administrative projects. They will continue to perform these duties for all projects and activities for which funding is identified in this application, in compliance with the governing regulations at 24 CFR Part 58.

Familiarity with Cross-Cutting Federal Requirements

The City is very familiar with the numerous cross-cutting federal requirements that would apply to the projects and programs outlined in this application. The HCD Compliance Specialist’s role for the City is to ensure compliance with application regulations, including Section 3, Environmental Reviews, Build America Buy America, Davis Bacon, lead-based paint, Section 504, FFATA, URA, and the guidance at 2 CFR 200. Within the last three years, the City has implemented projects triggering each of these regulations and has documented policies and procedures to ensure compliance. Having a compliance team within HCD ensures close communication throughout the lifecycle of a project.

Additionally, the City is an active leader of the Idaho Fair Housing Forum and works closely with partners throughout the community to share information and resources regarding the Fair Housing Act. The City also works collaboratively across its teams and departments to ensure that information about programs, services, and activities is available in formats accessible to the community. This includes updates to our City website to make it compatible with Google’s translation function, providing ASL interpreters at events, publishing information in multiple languages, and ensuring locations where in-person events are held are physically accessible.
EXHIBIT F: MATCH OR LEVERAGE

CITY OF BOISE

The City intends to provide a match towards funds requested in this application through two primary sources: land and salary costs.

The City anticipates that multiple team members whose salaries are paid from City General Funds will spend time supporting the projects and programs identified in this application.

- HCD Senior Manager: 5% of total time annually, for a 6-year term = 624 hours
- HCD Operations Manager: 15% of total time annually, for a 6-year term = 1,872 hours
- HCD Compliance Manager: 5% of total time annually, for a 6-year term = 624 hours
- HCD Compliance Specialist: 15% of total time annually, for a 6-year term = 1,872 hours

The total amount of salary costs that will be matched using City General Funds is $282,497.

The City invested in the preservation of a manufactured home community (Sage Mobile Home park) in August 2022. The total cost to purchase the land was $2,100,000, which was completed using City General Funds. If funds are awarded through this application to further invest in the community, a Memorandum of Restrictive Covenants will be recorded on the property, restricting use to affordable housing for the next 50 years.
EXHIBIT G: LONG-TERM EFFECT
CITY OF BOISE

PRICE Program funds would have a lasting, generational impact on hundreds of residents throughout Boise. The City has worked to identify strategies to address the current housing crisis by increasing the inventory of affordable housing to meet the current, significant need. However, the City’s longer-term vision recognizes that the underlying factors leading to the current housing shortage must also be addressed and mitigated whenever possible. This includes preserving housing that is currently affordable but at risk of redevelopment or change in use thereby preventing displacement and expanding access to more types of housing to meet the diverse needs of Boise residents.

Through the PRICE Program, the City intends to develop a revolving loan fund specifically to preserve existing manufactured housing communities. By ensuring current manufactured home park owners have access to financing and project management support, the City is able to play a role on multiple fronts:

- Promoting housing stability for existing residents.
- Preventing future redevelopment throughout the period of affordability.
- Maintaining space rent that is affordable to residents.
- Establishing policies to protect residents and promote community leadership.
- Improving infrastructure to increase safety, resilience, and livability for residents.

This proposal also anticipates making funding available to support the purchase of existing manufactured housing communities, in order to prevent a change of use or significant increases in space rent that may cost burden residents. The City intends to work closely with non-profit and other mission-driven organizations to identify and support these opportunities to preserve affordability for residents, now and over the long-term. The long-term affordability requirements that will be imposed will ensure that families can stay in place for as long as they choose, offering a stability that may allow them to focus on other priorities and achieve future goals. Purchas of a manufactured home community or infrastructure investments represent opportunities to have a generational impact on housing stability and affordability for current and future residents of those communities.

Through assistance for homeownership, the PRICE funds will similarly directly support households in achieving homeownership. Funding will be provided with terms that would not cost burden a household and will ensure the household is set up for long term financial stability and success. With a special emphasis on reaching underserved populations, there is an opportunity to promote equity throughout the community.

Funding investments in the critical infrastructure at Sage Mobile Home Park would similarly ensure the safety and livability of the park for its current and future residents. The long term affordability these investments would bring represents generational change and housing mobility opportunities for residents.
Residents receiving assistance for home rehabilitation projects will be able to age in place, in homes that are safe, decent, sanitary, more resilient, and meet the household’s needs currently and into the future. This will ensure that existing affordable homes can remain so, and residents will be stably housed within the community.

In the larger picture, the investments the PRICE Program can offer for the Boise community have the opportunity to touch the vast majority of residents residing in manufactured housing while demonstrating the City’s commitment to manufactured housing’s role in the community’s housing stock.
ATTACHMENT A: ADVANCING RACIAL EQUITY

CITY OF BOISE

The City of Boise is proud to be a welcoming community striving to ensure a safe, equitable, and inclusive city that celebrates the diversity of the people who live, work, and play in our community and recognizes the fundamental human dignity of all. Further, the City believes that everyone deserves access to safe, affordable housing and equitable opportunities for community development, regardless of race, ethnicity, gender, sexual orientation, age, ability, or socio-economic status.

The Housing and Community Development (HCD) team who will be responsible for administering the PRICE funds recognizes that historical and systemic injustices have disproportionately affected marginalized communities, and we are dedicated to actively dismantling these barriers. We strive to create a welcoming and inclusive environment where all individuals feel valued, respected, and empowered to contribute their unique perspectives and talents. Through our programs, policies, and partnerships, we are committed to advancing DEIB principles in all aspects of our work. We will continually assess and improve our practices to ensure that they are equitable and inclusive.

An inequitable housing market has a disproportionate impact on lower-income households and households experiencing homelessness. An equitable distribution of resources means that our strategies are weighted to correct for inequities and center the most marginalized.

Healthy, sustainable neighborhoods include housing at all price points, and people need and deserve safe and stable housing in neighborhoods of their choice. Across the housing spectrum, the level of affordability within neighborhoods should align with the income distribution of Boise households.

Within this PRICE program application, the City intends to support existing residents of manufactured housing through home rehabilitation, eviction prevention, and preservation/repairs for existing manufactured home communities. The 2022 American Community Survey data indicates that 20.9% of households residing in Mobile Home (as defined by the U.S. Census Bureau) identify as a race other than White. Within that 20.9%, the largest group identifies as ‘Some Other Race’ (324 households), followed by ‘Two or More Races’ (294 households).
The City also intends to make financing for the purchase of a manufactured home available to low-to-moderate income residents. American Community Survey data (2022, 1-year estimates) indicates that 51% of households in Boise earn 80% of the AMI or less, and 9.3% of the population speaks a language other than English at home – 3.2% of that population speaks English less than ‘very well’. Of the population speaking languages other than English at home, Spanish is the highest percentage (4.4%). The City maintains data regarding language translation services utilized and the most common languages requested after Spanish are Swahili, Kinyarwanda, Burmese, Arabic, Russian, Somali, Karen, Korean, and Farsi. Knowing that the City has a large population of new American residents, translation and interpretation resources have been developed and systems implemented to ensure residents have access to information and services.

Current residents of manufactured housing and other Boise residents seeking to access resources offered through PRICE-funded activities may experience barriers related to accessibility of information. The community engagement and affirmative marketing plans identified for PRICE-funded activities outline plans to disseminate information widely throughout the community, focusing specifically on existing manufactured home communities. That information will be shared in both English and Spanish, and conversations with property managers, resident leaders, service providers, and residents within those communities will help determine the additional languages for translation that each community will need. Additionally, the City will utilize its contacts with new American community and faith leaders to share information about programs and services available. The City utilizes Language Line Solutions, along with Pocketalk voice translators, to offer interpretation services. Additionally, a team of local interpreters has been identified to assist in providing interpretation services at events, as well as translation of documents. The HCD Operations team has three members who are fluent in Spanish and able to assist residents with providing information and completing applications whenever needed.

The HCD team will track demographic information regarding applications for and utilization of programs and services offered through PRICE-funded activities. This information will be compared to demographic information available for the City as a whole, and specifically for residents of Mobile homes (as identified in the American Community Survey data) to identify disparities. If disparities are found, the City will increase efforts to better understand why services are not being utilized and what barriers are preventing residents from accessing them.
ATTACHMENT B: AFFIRMATIVE MARKETING
CITY OF BOISE

The City of Boise has adopted Affirmative Marketing Policies and Procedures, which guide the implementation of affirmative marketing efforts for HUD funded programs and projects for both the City and its subrecipients.

The City intends to lead broad, community-wide advertising of the opportunities to access PRICE funding for home improvement, eviction prevention, financial assistance for homeownership, and homeownership counseling. Beyond sharing information via the City's newsletter and social media accounts, specific outreach to underserved community members will be undertaken to ensure awareness of resources and programs. All program/resource information will be translated into Spanish (and any additional languages upon request), and the City will utilize its Language Access Program Manager and Community Engagement team to share information with hard-to-reach community members via Spanish language radio, at community events, in branch libraries, through its network of partner agencies serving limited English proficient and/or low to moderate income community members, and with other lending agencies.

The City fosters relationships with local faith based leaders, community leaders representing a wide array of new American communities, representatives from the Hispanic/Latinx community and others, and actively engages these groups of stakeholders on an ongoing basis. Alongside community service providers, these key stakeholders assist in information dissemination throughout the community on behalf of many City initiatives and projects.

The City also plans to share information about programs with the property managers, community resident organizations, owners of manufactured housing communities, and residents via informational brochures, attending community meetings, and in-person discussions. Door-hanger brochures will also be delivered within manufactured housing communities to advertise the opportunities for home improvements.
ATTACHMENT C: AFFIRMATIVELY FURTHERING FAIR HOUSING

CITY OF BOISE

The City of Boise is committed to affirmatively furthering fair housing. In addition to the protections offered by the Fair Housing Act, the City adopted a Non-Discrimination Ordinance in 2012 that supplements state and federal civil rights laws by prohibiting housing discrimination on the basis of sexual orientation, gender identity, and gender expression.

As discussed in Exhibit C: Need, discriminatory lending practices are a significant barrier faced by low-income households, especially non-white households and households who speak a language other than English as their primary language.

The City intends to offer financial assistance for residents seeking to purchase a manufactured home as part of the activities funded through the PRICE program. As an Equal Housing Lender, the City does not discriminate and actively works to reduce barriers that may prevent access for low-to-moderate income residents and residents that do not use English as their primary language. Beyond ensuring that information is available and accessible to all community members, the City will ensure that its financial assistance is provided in a way that does not create a cost burden for a household and meet the standards of a Qualified Mortgage, as established by the Consumer Financial Protection Bureau.

As indicated in the American Community Survey data of households living in Mobile homes, 27% of those householders are 65 years or older and 50% of the mobile home units were built prior to 1980. These statistics, while not formally documented in the City’s Analysis of Impediments, indicate that there is a high likelihood many households may need investments into accessibility features and general home rehabilitation in order to ensure that their home remains a safe, accessible, and healthy place to live. To help achieve those goals, the City intends to expand its Home Improvement Program, specifically to focus on manufactured housing residents who may need assistance to bring their home into decent, safe, and sanitary conditions. All marketing and implementation of the programs will be done in compliance with the Fair Housing Act and all applicable civil rights laws.
ATTACHMENT D: ELIGIBLE APPLICANTS

CITY OF BOISE

Applicant type: 02 (City government): City of Boise City, Idaho
ATTACHMENT E: EVIDENCE OF PARTNERSHIP LETTERS

CITY OF BOISE

This documentation will be submitted as part of the completed application package.
This documentation will be submitted as part of the completed application package.
ATTACHMENT G: APPLICATION CERTIFICATIONS & STANDARD FORMS

CITY OF BOISE

The following certifications and forms will be submitted with the complete application package in Grants.gov.

- SF-424
- SF-424B (Nonconstruction)
- HUD 424-B
- HUD 2880
- SF-LLL
- Certification of Lobbying Activities
- Federal Assistance Representations & Certifications
- HUD-424-CBW
- SF-424D
- PRICE Certifications
- Appendix B.I.
- Appendix B. VII
ATTACHMENT H: SUMMARY OF COMMENTS
CITY OF BOISE

This will be completed following the conclusion of the public comment period.