

Action Plan

Grantee: City of Boise

Grant: B-23-PR-16-0002

LOCCS Authorized Amount:	\$ 6,773,702.72
Grant Award Amount:	\$ 6,773,702.72
Status:	Reviewed and Approved
Estimated PI/RL Funds:	\$ 0.00
Total Budget:	\$ 6,773,702.72

Funding Sources

No Funding Sources Found

Narratives

Action Plan Summary:

The City of Boise's PRICE Action Plan outlines a series of programs and projects that will significantly increase housing stability, preserve affordability, and support many of the City's most vulnerable and lowest income 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 and manufactured housing communities can be preserved to ensure long-term affordability for residents. There are at least 50 manufactured housing communities within Boise and 2022 American Community Survey data estimates over 4,000 mobile homes. These homes represent a significant portion of the City's overall affordable housing stock – totaling nearly twice the number of deed-restricted units in Boise. While the City has invested heavily (over \$40 million in local funds and another \$20+ million in federal funds) in new deed-restricted housing in the last five years, the City also recognizes the deep need to preserve naturally occurring affordable housing, including mobile/manufactured homes.

Given this data and the results of the City's most recent Housing Needs Analysis, the City intends to invest PRICE Program funds to carry out a wide range of activities to address significant, known needs of our current manufactured housing communities and the residents who live in these parks. The Housing Needs Analysis found that 2,019 new or significantly renovated units are needed each year, and 58% of the demand is for units affordable to households earning less

than 80% of the Area Median Income.

The City has prioritized those activities that are of the highest importance and will be able to begin immediately; specifically:

- Critical infrastructure repair of a park the City recently acquired to preserve affordability for 26 households,
- Installation of six new homes on the vacant lots within that City-owned park,
- Support for home repairs needed by existing manufactured housing residents,
- Eviction prevention and housing counseling for manufactured housing residents,
- Preservation via acquisition of manufactured housing communities that may be listed for sale.

These proposed activities are rooted in the City's firm commitment to creating a home for everyone at all price points and fostering a welcoming and livable community where residents have opportunities that allow each household to access the housing that best suits their needs and goals.

Administering Agencies & Roles

The City of Boise will administer the PRICE funds through its Housing and Community Development (HCD) Division. Critical infrastructure repairs will be led by the City's Public Works Department, supported by the City's HCD Operations Manager and HCD Project Coordinator to ensure compliance with all related federal requirements. The HCD Project Coordinator will lead the installation of new manufactured homes on the vacant lots. The HCD Operations Manager will oversee the expansion of the City's existing Home Improvement Program to support home repairs needed by existing manufactured housing residents; the actual repairs will be managed by the City's Rehab Coordinators and the City's Grants and Loans Analyst. The HCD Operations Manager will oversee the process to subgrant funds to Jesse Tree for eviction prevention and housing counseling for manufactured housing residents. Opportunities to preserve existing manufactured housing communities via acquisition will be managed by the HCD Operations Manager, HCD Senior Manager, and HCD Project Coordinator.

Contact Information

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Resources and Budget:



Need:

Funding was awarded under the PRICE Main program.

Project Area and Need for Affordable Housing

All projects and programs identified within this Action Plan 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 study^[2] (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 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%^[3]. In fact, in 2020, Boise saw the highest rent increase in the nation^[4]. Although rents have decreased slightly (3.7%) over 2023, the multifamily vacancy rate at the end of 2023 was 1.81%^[5] and Idaho is ranked the 4th most expensive US state for renters^[6]. 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^[7] 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^[8]. 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^[9]. 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 earning under \$71,300 (80% AMI in Boise) have in savings is \$10,000^[10]. 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^[11].

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^[12]. 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.’”^[13]

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 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 Mobile Home Park is located in Census Tract 17.02, which qualifies as an economically distressed CDFI Investment Area^[14]. 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 is discussed further in the Soundness of Approach exhibit, Sage Mobile Home Park has critical infrastructure repair needs, for which the City will use PRICE Program funds 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.

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).

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's community must prepare for and respond, recover, and adapt to 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. 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, 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^[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.
- 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 disproportionately 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.

[1] <https://realestate.usnews.com/places/rankings/fastest-growing-places>

[2] Krutzig, S. (2021, November 13). Boise is now the least affordable housing market in U.S., study says. The Seattle Times [online], <https://www.seattletimes.com/business/real-estate/boise-is-now-the-least-affordable-housing-market-in-u-s-study-says/>

[3] Day, D. (2022 August 23). Apartment rents zoomed in 2021. So far in 2022, the increases aren't as sharp. Boise Dev [online] <https://boisedev.com/news/2022/08/23/boise-apartment-rents/>.

[4] Suppe, R. (2021 February 8). Study: Boise saw highest rent increases in US during pandemic. Idaho Press [online] https://www.idahopress.com/news/local/study-boise-saw-highest-rent-increases-in-us-during-pandemic/article_3f5ebec1-920a-5053-90b5-ffed8af1659f.html

[5] <https://www.weknowboise.com/rental-market-vacancy-rates.php>

[6] Idaho named the fourth most expensive US state for renters. (2023, May 31). Idaho Business Review [online] <https://idahobusinessreview.com/2023/05/31/idaho-named-the-fourth-most-expensive-us-state-for-renters/>

[7] Schwedelson, P. (2022 October 24). 'The data makes it pretty clear': Boise-area home prices rise 4 times as fast as income. Idaho Statesman [online] <https://www.idahostatesman.com/news/business/article259538904.html>.

[8] Boise Regional Realtors "Ada County - Single Family Homes; March 2024 Market Statistics" <https://www.boirealtors.com/wp-content/uploads/2024/04/Market-Report-March-2024-Ada-County.pdf>

[9] © 2024 "First-Time Homebuyer Affordability" National Association of Realtors ®. All rights reserved. Reprinted with permission. May 3, 2024. https://cdn.nar.realtor/sites/default/files/documents/hai-q4-2023-first-time-homebuyer-affordability-2024-02-08.pdf?_gl=1*1y8ozcx*_gcl_au*NTE0MzY2Mzk0LjE3MTQ0MTUyMjIj.

[10] <https://time.com/personal-finance/article/average-american-savings-account-balance/>

[11] As listed on Zillow.com

[12] Birdsall, J., Emerson, S., Humphreys, M., Mason, S., Nehila, K., Rodenhiser, R., Shallat, T. (2007, November). Mobile Home Living in Boise, its uncertain future and alarming decline. A report to the Mayor of Boise from the Boise State University College of Social Sciences and Public Affairs. Published by the Center for Idaho History and Politics.

[13] Sven, B. (2016, December 23). Mobile home living at risk as Treasure Valley developers snap up land. Idaho Statesman [online] <https://www.idahostatesman.com/news/local/community/boise/article121261123.html> #storylink=cpy

[14] U.S. Department of Treasury. CDFI Fund CIMS Mapping Tool. https://cimsprodprep.cdfifund.gov/CIMS4/apps/pn-cdfi/index.aspx#?entity=CT_2020_CDFI,16001001702 ¢er=-116.212445,43.58295&level=15&visible=CT_2020_CDFI

[15] National League of Cities "Local Tools to Address Housing Affordability: A State-by-State Analysis". <https://www.nlc.org/wp-content/uploads/2020/10/local-tools-to-address-housing-affordability-a-state-by-state-analysis.pdf>

[16] Glantz, Aaron, and Emmanuel Martinez. "For People of Color, Banks Are Shutting the Door to Homeownership." Reveal, Feb. 15, 2018. <https://revealnews.org/article/for-people-of-color-banks-are-shutting-the-door-to-homeownership/>.

Use of Funds - Soundness of Approach:



Use of Fund - Method of Distribution (State grantees only):

N/A - City of Boise is not a State grantee

Grantee and Partner Capacity:

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.

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. 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.

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.

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 will 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
- Mayor's Director of Housing and Homelessness

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: 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: responsible for development of Action Plans,

performance reporting, fair housing and affirmative marketing.

- HUD Specialist: responsible for subrecipient agreements and reporting, assistance with marketing and outreach efforts, and long-term loan servicing.
- HCD Grants and Loans Analyst: responsible for providing assistance with program applications, verifying income eligibility, underwriting, document preparation, and review of subrecipient funding draws.
- HCD Compliance Manager: responsible for managing annual monitoring for subrecipients, completing risk assessments, and managing all aspects of compliance.
- HCD Compliance Specialist: 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 Coordinators: 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
- Grants Accountant
- Attorney IV

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 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.

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.

Stakeholder Engagement and Public Participation Summary:

Public Participation Summary

The City of Boise published its application for PRICE Program funds on its website (which is accessible in multiple languages through Google Translate) on June 14th. The application was available for review and public comment was accepted on the application for a 15 day period (June 14 - June 30, 2024). Notices of this opportunity for public comment were published in both English and Spanish on the City's website as well as in the Idaho Statesman, per the City's Citizen Participation Plan. The City held a Public Hearing to solicit feedback on its application for PRICE Program funds on June 25, 2024. The hearing was held both virtually and in-person, in a location that was physically accessible. There were no attendees at the public hearing, but one comment was submitted in support of the City's application for PRICE funds.

Additionally, letters of support for the City's application were written by the Idaho Community Reinvestment Corporation and LEAP Housing.

Community Engagement

The City intends to lead broad, community-wide advertising of the opportunities to access PRICE funding for home improvement and eviction prevention/housing 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.

Long-Term Effect:

Long Term Effects

PRICE Program funds will 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 and the anticipated future 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, investments in the critical infrastructure at Sage Mobile Home Park, already a public asset, will ensure the safety and livability of the park for decades. The long-term affordability these investments would bring represents generational change and housing mobility opportunities for both

current and future residents. The City will record a Memorandum of Restrictive Covenants that will run with the land at Sage Mobile Home Park for a period of 50 years; these covenants will ensure that the area remains preserved as a manufactured housing community with affordable rents and tenant protections. Further, the City intends to fund the preservation of existing manufactured housing communities by providing financing to organizations intending to acquire and preserve existing parks, preventing a change of use and/or displacement of low-income residents. To that end, the City will 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.

Investment in manufactured home communities represents a critical opportunity to have a generational impact on housing stability and affordability for current and future residents of those communities. The City and its partners are positioned to buy long-term affordability that supports the City’s long-term housing goals in multiple significant and lasting ways:

- 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.

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.

Overall, the investments the PRICE Program will offer have a high potential to impact a significant portion of residents residing in manufactured housing within our community. Furthermore, these investments align with other efforts the City has made that demonstrate its long-term vision, planning, implementation and commitment to enabling a variety of housing types to create housing options at all price points – namely, overhauling our zoning code to remove barriers to housing and to thoughtfully increase density and investing significant local dollars in the construction of affordable housing. These efforts are demonstrative of the City’s commitment to investing in the long-term supply of affordable, safe, decent, and livable housing options for Boise residents at Boise budgets and across all neighborhoods, including our community’s manufactured housing.

Substantial Amendment (if applicable):

N/A - initial Action Plan

Project Summary

Project #	Project Title	Grantee Activity #	Activity Title	Grantee Program
1	Sage Mobile Home Park	1.1	Critical Infrastructure Repair	



		1.2	Purchase and Installation of New Manufactured Housing Units at Sage
2	Preservation of Existing	2.1	Rehabilitation of Manufactured Housing
		2.2	Financing for Acquisition of Manufactured Housing Communities
		2.3	Eviction Prevention and Housing Counseling
9999	Restricted Balance		<i>No activities in this project</i>



Activities

Project # / 1 / Sage Mobile Home Park

Grantee Activity Number: 1.1

Activity Title: Critical Infrastructure Repair

Activity Type:

PRICE - Utility Installation Upgrades, and/or Improvements

Project Number:

1

Projected Start Date:

05/01/2025

Project Draw Block by HUD:

Not Blocked

Activity Draw Block by HUD:

Not Blocked

Block Drawdown By Grantee:

Not Blocked

National Objective:

Low/Mod-Income Housing: Any assisted activity that involves the acquisition/rehabilitation of property to provide housing considered to benefit persons of LMI-only to the extent such housing will, upon completion, be occupied by such persons

Activity Status:

Planned

Project Title:

Sage Mobile Home Park

Projected End Date:

12/31/2026

Project Draw Block Date by HUD:

Activity Draw Block Date by HUD:

Total Budget: \$ 3,411,400.00

Most Impacted and Distressed Budget: \$ 0.00

Other Funds: \$ 0.00

Total Funds: \$ 3,411,400.00

Benefit Report Type:

Direct (Households)

Ancillary Activities

None

Projected Beneficiaries

Renter Households

0.0

Owner Households

26

20

6

100.00

of Households

26

20

6

100.00

Projected Accomplishments

of Singlefamily Units

Total

26

of Multifamily Units

of Housing Units

26

of Persons with New Access to Facility/Infrastructure Improvement



# of Persons with access to Public Facility/Infrastructure that is no longer	26
# of Persons with Improved Access to Facility/Infrastructure Improvement	
# of Linear feet of Public Improvement	
# of public facilities	

Proposed budgets for organizations carrying out Activity:

Responsible Organization	Organization Type	Proposed Budget
City of Boise	Unknown	\$ 3,411,400.00

Location Description:

Activity Description:

The existing master electrical meter (currently located on one of the resident spaces) will be relocated and fenced in to ensure access for personnel as needed and improve safety and the overall appearance of the park for residents. New underground conduits and connectors will be installed, and each space will have its own, new power meter. The water mains and connections for each unit will also be replaced, and each unit will have a new water meter installed.

Environmental Assessment: UNDERWAY

Environmental Reviews: None

Activity Attributes: None

Activity Supporting Documents: None

Grantee Activity Number: 1.2

Activity Title: Purchase and Installation of New Manufactured Housing Units at Sage

Activity Type:

PRICE - New Housing Construction Manufactured Housing Unit

Project Number:

1

Projected Start Date:

10/01/2025

Project Draw Block by HUD:

Not Blocked

Activity Draw Block by HUD:

Not Blocked

Block Drawdown By Grantee:

Not Blocked

National Objective:

Low/Mod-Income Housing: Any assisted activity that involves the acquisition/rehabilitation of property to provide housing considered to benefit persons of LMI-only to the extent such housing will, upon completion, be occupied by such persons

Activity Status:

Planned

Project Title:

Sage Mobile Home Park

Projected End Date:

12/31/2028

Project Draw Block Date by HUD:

Activity Draw Block Date by HUD:

Total Budget: \$ 780,000.00

Most Impacted and Distressed Budget: \$ 0.00

Other Funds: \$ 0.00

Total Funds: \$ 780,000.00

Benefit Report Type:

Direct (Households)

Ancillary Activities

None

Projected Beneficiaries

	Total	Low	Mod	Low/Mod%
# Renter Households	3	3		100.00
# Owner Households	3		3	100.00
# of Households	6	3	3	100.00
# of Manufactured Housing Units	6	3	3	100.00

Projected Accomplishments

	Total
# of Singlefamily Units	6
# of Multifamily Units	
# of Housing Units	6
# of Accessory Dwelling Units	6



Proposed budgets for organizations carrying out Activity:**Responsible Organization**

City of Boise

Organization Type

Unknown

Proposed Budget

\$ 780,000.00

Location Description:**Activity Description:**

Funds will be used to purchase and install 6 new manufactured homes.

Environmental Assessment:**Environmental Reviews:**

None

Activity Attributes:

None

Activity Supporting Documents:

None

Project # / 2 / Preservation of Existing Manufactured Housing

Grantee Activity Number: 2.1

Activity Title: Rehabilitation of Manufactured Housing

Activity Type:

PRICE - Rehabilitation of Manufactured Housing

Project Number:

2

Projected Start Date:

05/01/2025

Project Draw Block by HUD:

Not Blocked

Activity Draw Block by HUD:

Not Blocked

Block Drawdown By Grantee:

Not Blocked

National Objective:

Low/Mod-Income Housing: Any assisted activity that involves the acquisition/rehabilitation of property to provide housing considered to benefit persons of LMI-only to the extent such housing will, upon completion, be occupied by such persons

Activity Status:

Planned

Project Title:

Preservation of Existing Manufactured

Projected End Date:

09/30/2030

Project Draw Block Date by HUD:**Activity Draw Block Date by HUD:**

Total Budget: \$ 1,007,302.72

Most Impacted and Distressed Budget: \$ 0.00

Other Funds: \$ 0.00

Total Funds: \$ 1,007,302.72

Benefit Report Type:

Direct (Households)

Ancillary Activities

None

Projected Beneficiaries

	Total	Low	Mod	Low/Mod%
# Renter Households				0.0
# Owner Households	50	40	10	100.00
# of Households	50	40	10	100.00
# of Manufactured Housing Units	50	40	10	100.00

Projected Accomplishments

	Total
# of Singlefamily Units	50
# of Multifamily Units	
# of Housing Units	50

Proposed budgets for organizations carrying out Activity:

Responsible Organization	Organization Type	Proposed Budget
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Location Description:**Activity Description:**

Rehabilitation of owner-occupied manufactured housing to address life and safety concerns, accesibility, and weatherization needs.

Environmental Assessment:

Environmental Reviews: None

Activity Attributes: None

Activity Supporting Documents: None

Grantee Activity Number: 2.2

Activity Title: Financing for Acquisition of Manufactured Housing Communities

Activity Type:

PRICE - Affordable Housing Financing

Project Number:

2

Projected Start Date:

06/02/2025

Project Draw Block by HUD:

Not Blocked

Activity Draw Block by HUD:

Not Blocked

Block Drawdown By Grantee:

Not Blocked

National Objective:

Low/Mod-Income Housing: Any assisted activity that involves the acquisition/rehabilitation of property to provide housing considered to benefit persons of LMI-only to the extent such housing will, upon completion, be occupied by such persons

Activity Status:

Planned

Project Title:

Preservation of Existing Manufactured

Projected End Date:

09/30/2030

Project Draw Block Date by HUD:**Activity Draw Block Date by HUD:**

Total Budget: \$ 1,500,000.00

Most Impacted and Distressed Budget: \$ 0.00

Other Funds: \$ 0.00

Total Funds: \$ 1,500,000.00

Benefit Report Type:

Direct (Households)

Ancillary Activities

None

Projected Beneficiaries

	Total	Low	Mod	Low/Mod%
# Owner Households	30	20	10	100.00
# of Households	30	20	10	100.00
# of loans provided	1	1		100.00
# of Manufactured Housing Units	30	20	10	100.00

Projected Accomplishments

	Total
# of Singlefamily Units	30
# of Multifamily Units	
# of Housing Units	30
# of grants awarded	1



Proposed budgets for organizations carrying out Activity:**Responsible Organization**

City of Boise

Organization Type

Unknown

Proposed Budget

\$ 1,500,000.00

Location Description:**Activity Description:**

Gap financing will be available to support the acquisition of existing manufactured housing communities to preserve affordability.

Environmental Assessment:**Environmental Reviews:**

None

Activity Attributes:

None

Activity Supporting Documents:None

Grantee Activity Number: 2.3

Activity Title: Eviction Prevention and Housing Counseling

Activity Type:

PRICE - Housing Counseling

Project Number:

2

Projected Start Date:

10/01/2025

Project Draw Block by HUD:

Not Blocked

Activity Draw Block by HUD:

Not Blocked

Block Drawdown By Grantee:

Not Blocked

National Objective:

Low/Mod: Benefit to low- and moderate-income persons/families

Activity Status:

Planned

Project Title:

Preservation of Existing Manufactured

Projected End Date:

09/30/2030

Project Draw Block Date by HUD:**Activity Draw Block Date by HUD:**

Total Budget: \$ 75,000.00

Most Impacted and Distressed Budget: \$ 0.00

Other Funds: \$ 0.00

Total Funds: \$ 75,000.00

Benefit Report Type:

Direct (Person)

Ancillary Activities

None

Projected Beneficiaries

of Persons

Total

115

Low

90

Mod

25

Low/Mod%

100.00

Projected Accomplishments

of Singlefamily Units

Total

115

of Multifamily Units

of Housing Units

115

Proposed budgets for organizations carrying out Activity:**Responsible Organization**

City of Boise

JESSE TREE OF IDAHO, INC. THE

Organization Type

Unknown

Non-Profit

Proposed Budget

\$ 75,000.00

\$ 0.00

Location Description:

Activity Description:

PRICE funds will be subgranted to non-profit agencies to provide eviction prevention and housing counseling services to manufactured housing residents.

Environmental Assessment:

Environmental Reviews: None

Activity Attributes: None

Activity Supporting Documents: None

Action Plan History**Version**

B-23-PR-16-0002 AP#1

Date

07/01/2025

