

# Preservation & Reinvestment Initiative for Community Enhancement (PRICE) Application

Prepared by the Department of Neighborhood Services

June 2024

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Exhibit A:
Executive Summary

Preservation and new development of housing is key to maintaining and diversifying the housing stock within the City of Las Vegas. Approximately 670,000 people call Las Vegas home. 98,490 or approximately 14.7% percent of which qualify as low-to-moderate income households. Per data from the 2011-2015 American Community Survey, over 11,345 owner occupied households are cost burdened, and contribute over 50% of their income to their mortgage. The importance of household's ability to maintain their properties is critical in reducing the generational wealth gap as properties are transferred. However, increasingly with the rising costs in construction, and with the growing senior population, many of whom are on fixed incomes, an increasing amount of households are facing the inability to make repairs to their homes

Therefore, the City of Las Vegas is requesting \$5,000,000 in Preservation & Reinvestment Initiative for Community Enhancement (PRICE) funding for eligible activities such as repair, rehab, replacement, and new construction of manufactured housing units. With this funding, the City will be able to ensure long-term housing availability, accessibility, and affordability for eligible LMI households. With this funding the potential to redevelop existing blighted housing structures, which can have a significant impact on neighborhoods, with new manufactured housing is also an important component to the proposed program.

Being able to preserve and potentially diversify the housing stock within the City is a key component to affordability. As of August 2023, 2,407 out of 249,933 total housing units in the City of Las Vegas have been identified as mobile home units. There are also 232 housing units the city identifies as single family residences, as they have been converted to real property (titled to land), that are not included in the data but are manufactured housing. The city has identified 147 properties of existing manufactured housing that were built prior to 1976 which would fall into the replacement category and of course any property throughout the city that is in such disrepair could be considered for new construction. In a publication by Joshua Padilla titled "Manufactured Homes in Nevada Counties" published in the Lincy Institute and Brooking Mountain West in December 2022, identified only 4 counties in Nevada as having an increase in the number of Manufactured housing units between the years of 2009-2018. Clark County saw a 14.8% (3,547 units) decrease in the total number of manufactured housing units lost over that same nine (9) year period (Padilla, J., Vong, A., Saladino, C.J., Brown, W.E., 2022). With this application the city is making a concentrated effort to preserve the existing units and potentially expand the number of units depending on the applicants need.

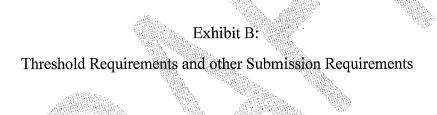
It is well known that Manufactured housing is more affordable than traditional stick built housing. In fact, per available HUD data, as of October 2023, the average sales price of a manufactured home within the West region of the country was approximately \$114,150, with single wide homes being approximately \$82,200/unit and double-wide homes going for approximately \$146,100/unit. In an article authored by Chadwick Reed, published by The Joint Center for Housing Studies of Harvard University, the cost of manufactured housing relative to site-built units falls to 54% for single wide units, 70% for double wide units and 80% for CrossMod units (CrossMod being a combination of off-site construction and onsite foundation) (Reed, 2023). It is well established that homeowners ideally should not pay any more than thirty percent (30%) of their gross income on housing costs and at the average costs for single and double wide units more households would be able to afford to become homeowners, the cost of the land not being factored into the total final cost amount.

It is with this knowledge that the City is proposing to repair/rehab 20 units of existing manufactured housing units with a price of approximately \$25,000/unit and to replace/newly construct an additional 25 units of manufactured housing with an average of \$160,000/unit. The City is being conservative in its proposal of replacing/newly constructing units due to the potential costs of relocation and having to construct permanent slabs, so the units can be considered real estate and not personal property, which will be required to meet the minimum HOME affordability requirements, and demolition costs none of which are known at the time of application submittal. However, the City is anticipating that the combined additional costs of these items will not exceed \$46,000/unit. Of course the City will assist additional households until the funds are expended.

With the anticipated deadline of September 30, 2030, per the Notice of Funding Opportunity, the City plans to hire a new Grant Program Coordinator at the admin cap of \$500,000 (10% of total request) to coordinate the implementation of the program. The additional funding for a position will secure that position for approximately four (4) years which coincides with the anticipated internal deadline for expending funds as being proposed in this application.

The need for preservation of these units is vital to residents of Manufactured housing units in particularly for Low-to-moderate income households whom may not have the means to make improvements to their units. Being awarded funding will enable the city to make a lasting impacts in the community either on an individual scale or the neighborhoods at large.





# 1. Resolution of Civil Rights Matters

The City of Las Vegas does not have any outstanding civil rights matters.

# 2. Timely Submission of Applications

The City of Las Vegas has submitted this application prior to the established deadline of 11:59 p.m. July 10, 2024.

# 3. Eligible Applicant

The City of Las Vegas is eligible to apply for funding as established in accordance with Section III.A of the issued NOFO.

# 4. Number of Applications

The City of Las Vegas is submitting only one application to this NOFO.

# 5. Statutory and Regulatory Requirements Affecting Eligibility

The City of Las Vegas has the necessary processes and system in place to comply with the Award Term in Appendix A of 24 CFR part 170.

# 6. Program Specific Requirements

National Objective: The City of Las Vegas confirms that the proposed activities within this application will benefit low and moderate-income persons. All households receiving funding through the PRICE Manufactured Housing Grant will be income eligible which will meet the national objective requirement under Section 101(c) of the Housing and Community Development Act of 1974.

# **Eligible Activity**

- 1. Preservation and Revitalization activities include: Repairing, rehabilitating, and reconstructing existing manufactured housing units (except pre-1976 mobile homes, which are eligible for replacement only), including repairs, rehabilitation, or reconstruction to improve physical accessibility
- 2. Manufactured housing development activities: Financing the acquisition or installation of affordable, accessible housing or acquiring affordable manufactured housing units or construction using modular or other eligible constructed housing

### 7. Advancing Racial Equity

The City of Las Vegas is committed to advancing racial equity and it is noted in the Soundness of Approach Narrative as required in the NOFO.

# 8. Affirmative Marketing

The City of Las Vegas is committed to Affirmative Marketing, and it is noted in the Soundness of Approach Narrative as required in the NOFO.

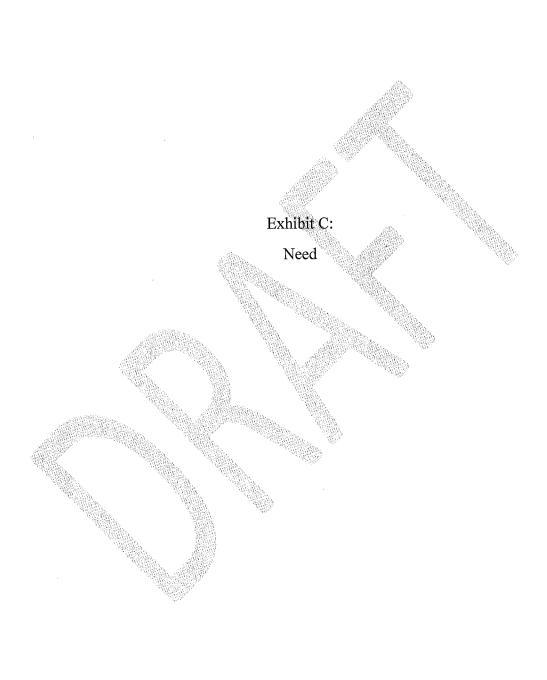
# 9. Affirmatively Furthering Fair Housing

The City of Las Vegas has an adopted AFFH plan as required for being an Entitlement jurisdiction.

# 10. Other Submission Requirements

The City of Las Vegas is confirming that the following documents have been attached to this application is required by the NOFO.

- Standard Form 424 (SF-424) Application for Federal Assistance
- Assurances (HUD 424-B)
- Applicant Disclosure Report Form 2880 (HUD 2880)
- Disclosure of Lobbying Activities (SF-LLL)
- Certification Regarding Lobbying (Lobbying Form)
- Federal Assistance Representations and Certifications
- Grant Application Detailed Budget Worksheet (424-CBW
- Assurances for Non-Construction Programs
- Assurances for Construction Programs



### **Project Area**

This proposed program does not have a defined geographic area other than properties must be located within the City of Las Vegas jurisdiction (Figure 1 and Figure 2). All homeowners may apply for assistance however eligibility of households will be determined based upon two factors as required by HUD:

- 1.) Income Eligibility: Households must be under 80% AMI to be eligible for assistance
- 2.) Property Eligibility: Owner Occupied Manufactured Unit that is currently or could be titled to the land.

# Special Circumstances:

The city does recognize there could be instances where a Non-Manufactured housing unit may need to be replaced (due to condition). The city also recognizes there could be instances where a household may not meet income eligibility. These specific cases would be assessed on an individual basis and a determination would have to be made that they can meet the Slum and Blight National Objective.

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Figure 2: City of Las Vegas Wards

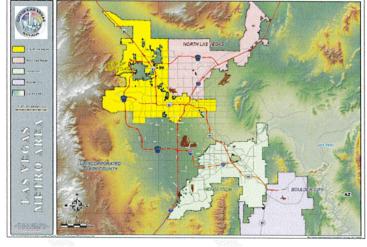


Figure 1: Jurisdictions in Clark County, NV.

# <u>Need</u>:

Clark County Comprehensive Planning division annually produces population estimates that live within designated housing types within all Clark County jurisdictions and as of August 2023, the total population that resided in mobile home units within the City of Las Vegas was 7,245. This does not include any single family homes that originated as manufactured homes (now they are titled to the land and therefore considered single family homes). This is out of a total of population of 669,679 of residents within city limits. While this may be a small percentage of the overall Las Vegas population, data from the U.S. Census Bureau indicates that the state of Nevada

saw an increase of over 300% from the number of manufactured homes being built from 2012-2018. This huge increase illustrates the immense demand for more affordable housing options within the state and particularly the need to diversify the housing stock in the city jurisdiction when available.

The City has identified the following three areas that it can complete additional outreach if initial demand does not reach what the city is anticipating. The three areas are the following:

Area #1: Jade Park Subdivision

Area #2: Existing Mobile Home Parks

Area #3: Rental Housing

# Potential Areas of need:

### Area #1: Jade Park Subdivision



Figure 3: Jade Park Subdivision (Ward 5)



Figure 4: Closer View of Potential Area of Need

The city of Las Vegas has identified 379 properties with the principal residence as Manufactured Housing. Of the 379 properties, 168 properties have housing units that predate 1976 thus making these units only eligible for replacement. Ironically, 370 of the 379 properties identified are located within the Jade Park Subdivision located within Ward 5 of the City of Las Vegas (Figure 3 & 4).

Phase 1 of Jade Park was established in 1972 with the final platted section at the end of 1977. Ward 5 consists of 110,000 residents with approximately around 41,000 dwelling units. Ward 5, a diverse population includes residences whom identify as Hispanic (45.7%), Black (18.9%), White (25.7%), Asian (4.2%) whereas the City of Las Vegas demographics include 33.9% Hispanic, 11.3% black, 41.4% White, 6.6% Asian. 77.6% of residents within ward 5 are High School graduates and only 12.8% are College graduates whereas City of Las Vegas at large is 85.7% High School graduates and 26.8% are college graduates.

The median household income for ward 5 is \$49,259 (as of 2023), whereas the city of Las

Vegas is \$68,279. 22.7% of Ward 5 residents have incomes below the poverty level compared to

14.6% of the whole city. 23.8% of residents within ward 5 are also Foreign Born compared to 20.7% of city residents and 57.7% speak only English spoken at home with 42.3% speaking a language other than English.

# Area #2: Existing Mobile Home Parks

There is the possibility to have conversations with the existing manufactured home park owners to identify potential infrastructure needs. Through the initial planning pre-award phase the city has identified sixteen (16) mobile home parks (Figure 5) within its jurisdiction but identified that households whom own the manufactured units within the identified parks pay a lot fee, therefore making them ineligible for the repair/rehab/replacement/new construction program because there would be no mechanism to establish the affordability period as required.

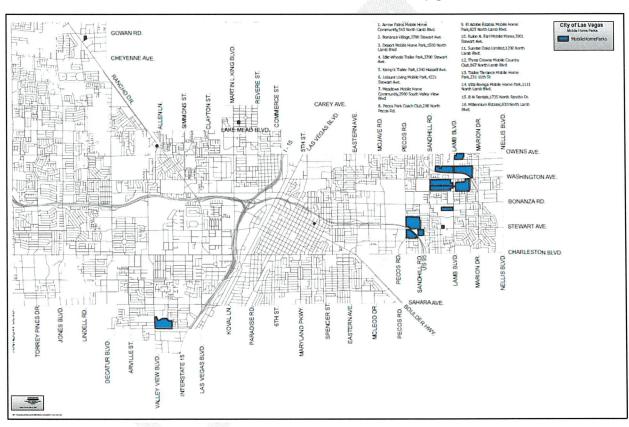


Figure 5: Existing Manufactured Home Parks within the City jurisdiction

If there is a pivot to infrastructure in existing manufactured home parks, then the city will ensure that the national objective has been met more than likely as an LMI-Area.

# Area #3: Rental

While rental housing is not being proposed in this particular application the city recognizes that there is huge need of housing for extremely low and low-income households. Clark County estimates a shortage of more than 85,000 affordable homes for low-income residents. According to the National Low Income Housing Coalition, no state is worse than Nevada when it comes to the availability of affordable homes for extremely low-income people. However, Las Vegas fared

even worse than Nevada as a whole in 2018, as the metropolitan area had just 10 affordable homes available per 100 extremely low-income renter households. Among the 50 largest cities in the United States, the Las Vegas metropolitan area ranked first among "most severe" affordable housing shortages. Nevada is currently facing an affordable housing shortage and with rising construction costs, and delays in receiving building materials, affordable housing projects are taking longer to complete than anticipated. With this knowledge the city could pivot to focus on rental housing in some manner if there is still a lack of demand for activities relating to repair, rehab, replacement, new construction within Area #1: Jade Park or if there is no need for infrastructure in Area #2: Existing Mobile Home Parks.

# **Additional Need**

As part of its Consolidated Plan requirements the City of Las Vegas has identified (Under Table 1,2,and 3) housing conditions with selective issues, age of the existing housing stock and the number of units at risk of Lead-Based Paint Hazards below:

Condition of Units Owner-Occupied Renter-Occupied Number Number With one selected Condition 48,925 47% 33,025 29% With two selected Conditions 5,105 5% 690 1% With three selected Conditions 105 0% 270 0% With four selected Conditions 0% 0% No selected Conditions 70% 49,130 48% 78,355 100% Total 112,183 100% 103,430

**Table 1: Housing Units with Selective Issues** 

A selected condition is defined as one or more of the following components:

- Units with physical defects (lacking complete kitchen or bathroom)
- Overcrowded conditions (housing units with more than one person per room
- Housing cost burden (including utilities) exceeding 30 percent of gross income
- Severe housing cost burden (including utilities) exceeding 50 percent of gross income

Table	2:	Age	of	Housing	Stock
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Year Unit Built	Owner-Occ	cupied	Renter-Oc	cupied
	Number	%	Number	%
2000 or later	31,275	28%	25,054	24%
1980-1999	56,943	51%	51,390	50%
1950-1979	22,584	20%	24,985	24%
Before 1950	1,375	1%	1,995	2%
Total	112,177	100%	103,424	100%

Table 3: Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-C	Occupied	Renter-C	Occupied
	Number	%	Number	%
Total Number of Units Built Before 1980	23,959	21%	26,980	26%
Housing Units build before 1980 with children present	27,035	24%	11,365	11%

### **Remedies for Need**

It is important to note that historically the City of Las Vegas has used its HOME funds for the construction of rental property, therefore the PRICE funding provides a unique opportunity for the city to expand services to a new population of residents and to add an additional program opportunity for its residents to go along with the four identified below. The city's role in affordable housing production and preservation, has generally been to provide policy regulation, resources and infrastructure. The City has not managed or constructed affordable housing but had developed collaborations with developers to produce new units and preserve existing affordable housing stock. Within its established measures to address barriers to affordable housing the following measures can be utilized when dealing with homeowners:

- City Rehabilitation Program
- Abandoned Lot Program
- Safe Home Improvements Funding and Training Program (SHIFT)
- Lead Hazard Control and Healthy Homes (OLHCHH)

### City Rehabilitation Program

The City of Las Vegas funds a CDBG administered rehabilitation program and also provides funding to Rebuilding Together (Subrecipient) to complete home repairs. Both programs preserve and stabilize the community's affordable housing stock for low-and-moderate income households by providing safe, decent and sanitary housing to Las Vegas residents. The rehab programs are a vital option for elderly participants as it provides the ability for them to age in place without losing quality of life.

# Abandoned Lot Program

The purpose of this program was to reduce the amount of deteriorating real property located within the City, in particular, real property suffering from blight caused by the lack of adequate maintenance.

### Safe Home Improvements Funding and Training Program (SHIFT)

Proactive approach to assist the community in addressing potential code concerns. SHIFT may assist eligible households with funding and/or resources to comply with the City of Las Vegas Zoning and Municipal Code and to promote neighborhood safety and livability. Homeowners may receive assistance with funds and technical assistance to repair, improve, preserve and remove

health and safety hazards from dwellings and/or assist homeowners with bringing homes into compliance with Municipal Code and/or remediating issues related to Code Enforcement.

Lead Hazard Control and Healthy Homes (OLHCHH)

The Department of Neighborhood Services was recently awarded a 48-month grant by the Office of Lead Hazard Control and Healthy Homes (OLHCHH) to help develop cost-effective ways to reduce lead-based paint hazards in homes built prior to 1978 with children under the age of 6. The goal of this program is to create lead-safe and healthy housing in Las Vegas and reduce the incidences of childhood lead poisoning.

# **Barriers**

There are three main barriers to manufactured housing preservation or revitalization within the City of Las Vegas:

- Lack of ownership of mobile home parks. With the requirement to put liens on properties the owners of mobile homes must own the lots in which their units reside.
- The availability of land is another barrier that is difficult to overcome, as the need to build up is becoming increasingly more apparent vs. Building, out especially in the cities jurisdiction
- Availability of Contractors

Exhibit D:
Soundness of Approach

# I. Project Description, Management, and Impact:

### **Vision and Goals**

Based upon the data collected above staff has identified the goal of <u>replacing twenty-five</u> (25) housing units and repairing/rehabbing an additional twenty (20) units. Since the demand for both programs is not known at the time of this application, the city is flexible on how funds are spent within the program but the budget was established with an anticipation of 20 units being rehabbed at a cost of \$25,000/unit for a total of \$500,000 and 25 units being replaced with an average cost for Newly constructed/replaced units being approximately \$160,000/unit. The average calculation is based upon data provided by HUD's Office of Manufactured Housing, which provides the average sale price of manufactured homes, by region, within the United States and additional anticipated unidentified expenses. Per the data issued as of October 2023 the average Single wide manufactured unit is \$82,200 whereas the average double-wide unit is \$146,100. All eligible properties receiving a replacement unit will receive a similar unit in size, # of bedrooms, # of bathrooms, etc.

The city wanted to be conservative in its estimated outcomes as there are additional anticipated costs, such as establishing permanent foundations, demolition costs, relocation costs and permits/fees that may be corresponding to each unit. Due to these costs being unidentified at the time of submittal the city is creating a buffer of about \$46,000 per unit (Anticipated cost of \$160,000 subtracted by the average of a Single Wide and Double Wide Manufactured unit \$114,000). While demolition, permit fees, and relocation costs will certainly be associated to each replacement unit the need to create foundations for the replacement units, in order to title the new unit to the land, will be determined during the application process. There could also be unforeseen circumstances that may occur as well, so the city anticipates the buffer is adequate. Additional units will be assisted based on the availability of funds.

### **Program Description**

The City of Las Vegas is requesting \$5,000,000 of PRICE MAIN Funding in order to implement a Repair/Rehabilitation/Replacement/New Construction program with the PRICE Main Manufactured Housing Funds. All owner-occupied properties are eligible to apply and eligibility will be determined on a combination of income, property type and preliminary property inspection. Within the parameters of the program properties will be determined to either fall within 4 categories:

### Category 1: Repair

Repair needed to one major system to dwelling unit. Eligible items to include HVAC, Electric, Plumbing, Roof and Handicap Accessibility. Cap will be a max of \$24,999 and a lien will be placed on property in the form of a Deed of Trust, with a term matching the HOME Affordability limit. If the cost is less than \$15,000 then the length of the affordability period will be 5 years. If the costs are between \$15,000-\$24,999 then the length of the affordability period will be 10 years. It is anticipated that the liens associated to the repair category will be deferred

and declining over the course of the affordability period which will match the structure of the CDBG Rehab program.

# Category 2: Rehab

Rehab of units will consist of more than one major system or additional items within units such as floors, doors, windows, etc. The minimum unit level is \$25,000 and determination of amount of assistance will be made on a case by case basis with the corresponding affordability period tied to the final amount of assistance awarded.

# Category 3: Replacement

When reviewing applications, if the determination is made that the applicant resides in a manufactured unit that was built prior to 1976, then assistance will only fall under a replacement unit.

# Category 4: New Construction

When reviewing applications, if the determination is made that a property is in such disrepair and is not a manufactured home, then demolition of the existing unit and a new manufactured or modular unit will be built/located on the property. All of these projects would require a lien being placed on the property for a term of 15 years as the cost will be above \$40,000.

For both Replacement and New Construction the grant program coordinator will be responsible for determining the coordination/procurement, at the direction of management staff, on the three following components:

- a.) a manufactured home developer to coordinate the replacement/new construction of the units
- b.) contractors for the additional concrete work for creating permanent slabs in order to title the units to the land for eligibility in order to meet the minimum HOME requirements as established in the PRICE NOFO.
- c.) and the potential need to procure demolition contractors or allowing the resale of the units

The resale of the units will be determined on a case by case basis as the City anticipates the units being replaced are already in deteriorated shape and therefore uninhabitable. However, the city acknowledges the widespread need for affordable housing and if there are units that are in good shape the city will look to keep them in the overall housing stock. The city also acknowledges, that the proceeds from the sale of the units would have to be considered program income and ownership would either have to be granted to the city or the city would have to recoup the proceeds of the sale from the property owner. This would be determined by the city through the planning phase-post award.

# **Program Implementation**

Planning Phase Post-Award:

Once awarded, funding the City of Las Vegas will begin the recruitment process for a Grant Program Coordinator whose sole focus will be on implementing the PRICE Manufactured Housing Grant. As budgeted, this position would be expected to be filled for a limited duration term of four (4) years as the city anticipates funds to be expended within a 4-year timespan with an end date of September 30, 2029. The City has established this internal expenditure goal of September 30, 2029 in order to allow for an additional year extension of expending funds which would then coincide with the anticipated deadline established in the NOFO of September 30, 2030. While the city hopes to spend the funds by September 2029 it acknowledges there could be some delays or unforeseen circumstances that could delay implementation, such as construction timelines for the development of the replacement units and contractor availability for the Repair program.

### Outreach

A public hearing was conducted on June 17, 2024 and all comments have been incorporated into this application. A Press Release announcing the availability of funds will be released, if awarded funding, once the application is ready to be active. Any comments will be considered if there is a need to pivot to other eligible activities.

Additional outreach will occur if the city determines that demand for funds are lagging. A potential option is to canvass the Jade Park Subdivision neighborhood within Ward 5, as the city identified 370 potential eligible properties within the subdivision. The Department of Neighborhood Services has extensive knowledge on canvassing neighborhoods as demonstrated through the planning process for both of the Neighborhood Revitalization Strategy Area's and the Choice Neighborhoods planning grant for the Historic Westside. The city may elect to hold a neighborhood meeting with residents of the Jade Park subdivision along with canvassing if the need arises as they could be key stakeholders.

Since there are sixteen identified Mobile Home Parks the Grant Program Coordinator will reach out to existing manufactured home parks, if needed, for a list of potential infrastructure needs based on the detailed proposed timeline. If the Grant Program Coordinator determines there are more than one identified park with infrastructure needs, and the total need is beyond the remaining available funds, then an additional application cycle will be developed and an evaluation committee will be utilized to fairly review the applications.

The city is always in active communication with nonprofits, developers, builders/general contractors, unions on an everyday basis. However, one exciting new opportunity is to really engage with manufactured housing developers as this is not a realm the city has a lot of experience with. To engage with developers of manufactured housing, additional opportunities may be able to be developed for future development.

### **Application acceptance**

Applications would be accepted on a first come-first serve basis for both the Replacement and Rehab programs and the following flowchart will be the baseline for how the programs will be operated.

Eligibility per NOFO

Under section F.2.i. Preservation and revitalization activities include (a). Repairing, rehabilitating, and reconstructing existing manufactured housing units (except pre-1976 mobile homes, which are eligible for replacement only), including repairs, rehabilitation, or reconstruction to improve physical accessibility and under F.2.iii Manufactured housing development activities include: (f) Acquiring affordable manufactured housing units or construction using modular or other eligible constructed housing.

### National Objective

To meet the national objective requirement per CDBG regulations it is anticipated that all applicants will be Low-to Moderate Income at the time of income certification. However, the city recognizes that under the new construction category there could be instances where housing may need to meet the Slum/Blight national objective

# Reporting

The grant program coordinator and financial team will be responsible for completing all reporting requirements related to the PRICE Manufactured Housing Grant. The financial staff of the Department of Neighborhood Services will be responsible for drawdowns within the Disaster Recovery Reporting System. The financial team will also ensure that the quarterly expenditure reports are submitted on time. The grant program coordinator will be responsible for submitting the annual performance report within thirty (30) days of the end of the fiscal year.

# **Alternative Plan:**

As identified in the Needs sections if there appears to be a lag in eligible applicants come July 2027 then the City will started targeted canvassing of the Jade Park Subdivision. If funding is still available, the city will begin contact with existing manufactured home parks and identify any infrastructure needs. If issues continue then the city will look to provide rental housing in some capacity potentially through its abandoned lot program.

# **Detailed Proposed Timeline**

Estimated Project Start Date: 10/1/2024

Estimated Hiring Date of Grant Program Coordinator: 12/15/2024

Estimated Procurement Needs completed for Replacement Program: 4/15/2025

Estimated Application Portal operational: 5/15/2025

Estimated Program implementation: 5/15/2025-6/30/2028.

Estimate Program Area Narrow Focus (if needed): 7/1/2026

Estimated Pivot to infrastructure in Manufactured Home Parks (if needed): 7/1/2028

Estimated Pivot to Rental Housing in some capacity (if needed): 1/1/2029

Estimated end of City of Las Vegas Program: 9/30/2029

### **Budget Recap**

Total Program Cost	\$5,200,000
Administration	\$500,000
Relocation	\$275,000
Architectural and Engineering Fees	\$250,000
Site Work	\$375,000
Demolition and Removal	\$250,000
Construction	\$3,350,000
Other HUD Funding (CDBG Rehab)	\$200,000

### **Impacts of Activities**

From a macro perspective the replacement/newly constructed units will visual impact neighborhoods with the removal of blighted structures. From a micro viewpoint eligible households will be able to help preserve their units which can help the households retain equity.

# Affordability and Equity.

Since the intent of the proposed program is directly for existing property owners, the balance between affordability and equity will come into play with how funding will be utilized. Since the program is structured as a first come first serve program, the financial security will come down to the need of each individual property that receives funding. As indicated the city will follow the HOME affordability requirements and will require a lien in the form of a deed of trust to be located on each property assisted with PRICE funds.

One item to note is that for properties that are identified as "Manufactured Home Estates" there could be an opportunity, depending on the situation, to help households acquire the actual lots that those units reside, if they do not already own the lot. The City acknowledges that the "Manufactured Home Estates" are properties that currently contain manufactured homes but the manufactured home is not tiled to the property, therefore indicating the unit is considered personal property. All replacement units/new constructed units will have a 15 year minimum affordability period unless the new units are tied to rental housing under Area #3 identified in the Needs section. Although it is not anticipated that rental housing will be occurring, it would be the minimum affordability period of 20 years to match the minimum HOME requirements. If the property owners of the new homeowner units were needing to sell, then the city would recoup 100% of the funds expended as CDBG program income.

The program itself will be promoted to all City residents through the press release and availability for all households to apply. If there is a scenario that would require the use of the City's Affirmative Marketing plan it will follow the plan. Modifications for handicap accessibility will

be eligible and any new units can be made handicap accessible. If any applicants are seniors, the repairs or replacement of units will allow them to remain in place and live independently. The city will also be able to connect them to other resources, as it funds programs that could benefit Low-to-moderate income households through it's public service programs. These programs help with transportation for seniors, meals on wheels or other food assistance programs, potentially job training programs, or family support programs.

As an entitlement community the City of Las Vegas must partake and implement the Analysis of Impediments to Fair Housing and create a 5-year Consolidated Plan.

Adopted in 2020 the Analysis of Impediments identified 4 impediments to Fair Housing across the entire Clark County region. Those impediments are listed below:

- <u>Impediment #1</u>: Lack of knowledge of fair housing related laws and fair housing resources existing among the general public and housing providers
- <u>Impediment #2</u>: Economic barriers due to limited supply of adequate and accessible affordable housing especially affect protected classes
- <u>Impediment #3</u>: Subprime lending is on the rise and protected classes are more likely to secure subprime loans
- <u>Impediment #4</u>: Lack of access to transportation options reduces housing and economic opportunities

The actions identified to address these impediments are as follows:

- Action #1: Address lack of knowledge of Fair Housing
- Action #2: Address Disproportionate Housing Problems and Economic Barriers
- Action #3: Educate on and deter subprime lending
- Action #4: Address Lack of Access to Transportation options reducing housing and economic opportunities

As this application is geared toward existing homeowner properties the City of Las Vegas will make every attempt to be equitable in how it administers its program. If new construction is to occur on vacant properties the city will attempt to find parcels close to existing transportation lines in order to follow Action #4.

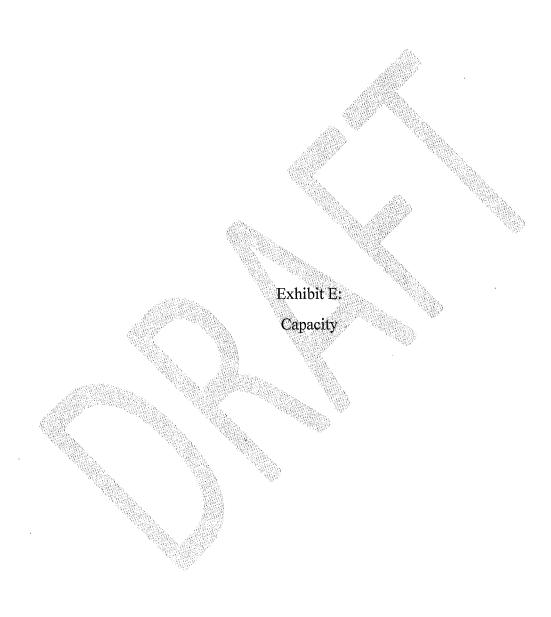
# **Environment and Resilience**

There are important environmental factors that the proposed program will be able to help eliminate related to the Environment:

- Need to address HVAC system issues: Since Las Vegas regularly deals with extreme
  heat the need to provide a mechanism for Low-to-moderate households to replace
  systems is vitally important
- Lead: The ability to help assist with the removal of lead is important in the development of children under the age of 6.
- Asbestos

- Repairs to plumbing can insure applicants have clean drinking water and or can alleviate health risks related to sewer issues
- Removal of blighted properties can have environmental impacts as well such as the removal of rodents from the neighborhood





### **Capacity**

The City of Las Vegas, Department of Neighborhood Services has a 6 member Grants Team that is responsible for an estimated 15 million in Federal and State funding. As an entitlement community the City administers federal programs including Community Development Block Grant (CDBG), HOME Investment Partnerships Funding, Emergency Solutions Grant, and Housing Opportunities for Persons with AIDS (HOPWA) funds. Within different teams of the department there is experience in managing state funds, additional federal funds and treasury funds. The new grant-funded position would report to Melanie Riley, Neighborhood Services Administrator, who has over 15 years of experience administering federal grants.

### Grants Team

The grants team (Figure 6) consist of Erika Ozaki (Monitoring and Compliance), Colleen Duewiger (HOME Program), Timothy Glisson (CDBG Program), Gina Candelario (HOPWA/ESG) and Vanessa Velazquez (Administrative Support). The new position would report under the grants division within the Department of Neighborhood Services.

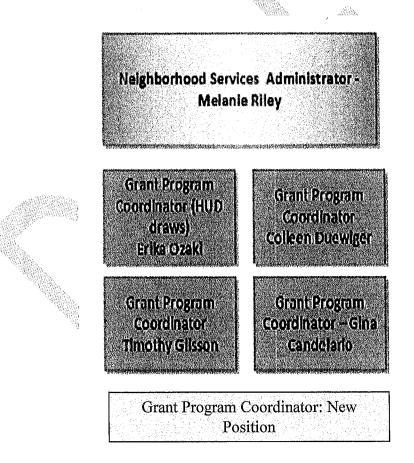


Figure 6: Grants Team within the Department of Neighborhood Services

### Finance Team

Darcell Campbell, who has 20+ years' experience pertaining to financial reporting is also a key staff member.



Figure 7: Financial Team within the Department of Neighborhood Services

There will be an additional person hired as part of the financial team for the whole department during FY2024-2025. Currently Clara Hernandez Gonzalez (Management Analyst II) of the admin team is assisting Darcell. The new position will report to Darcell.

# SHIFT Team

The SHIFT Team (Figure 8) includes a staff of 9 led by Patrick Pertrie who has over 10 years of experience administering federal grants including CDBG Rehab, HOME, LEAD and various other grants.

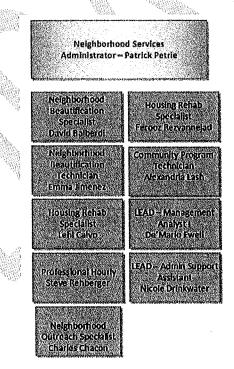


Figure 8: SHIFT Team within the Department of Neighborhood Services

At this time it is anticipated that the City of Las Vegas will issue an RFP for the services of a Manufactured Home Developer who will assist homeowners who fall within the replacement or new construction tier program with the engineering and design of their new units although this could be a role that the Grant Program Coordinator plays.

City of Las Vegas staff has a history of meeting timeliness standards through the CDBG program, which the PRICE Manufactured Housing opportunity is most similar to. As with all grants there are unexpected items that will arise, however the city staff is well positioned to take on the responsibility of this grant, to meet its proposed deadlines, and to accomplish its proposed outcomes.

### **Contingency**

If the Grant Program Coordinator position is ever vacant then the remaining Grants Team members will oversee the day-to-day operations of the grant. There is already an existing relationship between the Grants team and the SHIFT team due to the CDBG Rehab program and with the knowledge of repair/rehab programs and the HOME program, the other Grants Team members will be more than capable of overseeing the implementation of the grant.

Since the proposal anticipates replacing units/new construction of units the relationship between the developer and the grants team will be the key to successfully complete this grant. If there are any issues that arise between the developer and the grant program coordinator the Neighborhood Services Administrator will be able to step in and coordinate a solution. If no solution can be reached then the city can issue a new RFP/RFQ for a new developer to fill that role.

While it is anticipated that the individual property owners will work with the developer directly, the city expects that the grant program coordinator will be a facilitator/coordinator of the needs of both parties.

### **Additional**

As an Entitlement Community the City of Las Vegas has extensive knowledge of Completing Environmental Reviews and large-scale projects are handled within the Administration team within the department. It is anticipated that staff member De'Mario Ewell will handle the Environmental Reviews if the project falls within the repair or rehab category and that staff member Ashley Straight will handle environmental reviews for replacement or new construction categories. Various staff members are familiar with cross cutting federal requirements such as Davis Bacon labor standards, Audit Requirements and Uniform Relocation Act.

# Fair Housing

The City of Las Vegas partners with the Silver State Fair Housing Council (SSFHC) to advocate for fair housing by providing a comprehensive program of outreach, education and enforcement opportunities. By addressing the needs of housing consumers, housing providers and local governments, SSFHC works to break down barriers to equal housing opportunity and build opportunities for community members to relate to each other as neighbors.

# Submittal

This application was written by City of Las Vegas, Department of Neighborhood Services Staff:

Melanie Riley, Neighborhood Services Administrator Tim Glisson, Grant Program Coordinator



Exhibit F: Match or Leverage Although the Price Main Program does not require any match or leverage the City of Las Vegas will provide \$50,000/year of CDBG entitlement funding over the course of 4 years (\$200,000 total) to its rehabilitation program for eligible properties. The city does anticipate there could be possible Lead Hard Control and Healthy Homes funds contributing to the cost of the repairs/rehabs as well as funds from the City code enforcement funds but there is not a way to quantify the amount at the time of application submittal.

### Risk

The City does not anticipate any risks as this proposal is for the minimum amount available to be awarded to an applicant per the Notice of Funding Opportunity (NOFO). However, if HUD was to award less funding than the minimum to an applicant then the city would adjust its budget proportionally for the administration and program costs. The administration will remain capped at 10% as required by the NOFO and the program costs will cover the remaining difference to equal the awarded amount.

The City does acknowledge the need to potentially pivot to other eligible activities but based on the data the city still believes there is adequate need for the request in funding with the caveat that the anticipated type of outcomes could fluctuate. However, the city will do its best to complete a total of 45 projects.

Exhibit G: Long-Term Effect Consequences for decisions made in the past, present, and future can have devastating effects on local neighborhoods. Such decisions as redlining, blockbusting, building highways between communities, have contributed to the racial wealth gap and the inability to create generational wealth which is leading to the income inequality seen today. Income inequalities brother, social justice, will forever be intertwined in America's history. But, just like water rippling from one pebble, the ability to preserve, rehab, replace, or newly construct one property can have everlasting effects on a neighborhood.

It is said that one bad apple ruins a bunch, or a chain is only as strong as its weakest link; these colloquialisms can describe the effect of a dilapidated housing unit in a neighborhood. At first just one, and then another, and then two more down the street and before you know it the neighborhood perception is "don't go over there" there is crime, drugs, and other nefarious things going on or in the past it easily meant "those people are moving in" so we need to move now.

# Neighborhood Effect

This application attempts to combat the picture above, as the ability to newly construct a manufactured home can be a powerful tool to stop the ripple effect of blight within a neighborhood. The ability to stop blight can help alleviate the income inequality that many underserved communities face. According to the Brookings Institute article "Black wealth is increasing, but so is the racial wealth gap" by Andre Perry between 2019 and 2022 the median Black wealth increased from \$27,970 to \$44,890 but continued to lag other racial groups. In 2022, the median wealth was approximately \$62,000 for non-white Latino or Hispanic households, \$285,000 for white household, and \$536,000 for Asian American households. The disparity has increased and in fact in 2022 for every \$100 in wealth held by white households, black households held only \$15. A large factor that is contributing to the racial wealth cap is the disparities in homeownership between black and brown households. In 2022 only 44% of Black families owned a home compared to nearly 73% of white families (Perry et. al., 2024). This gap continues to persist due to the wealth being transferred between generations as older generations benefited from the discriminatory practices of redlining and blockbusting. While the beneficiaries of these funds will be individuals, the neighborhoods in which these units are rehabbed or replaced will benefit as well.

### **Individual Effect**

With the proposed program individual households effected will have a great deal of stress relief, which will help their psychological state. With a better psychological state eligible homeowners will have a better quality of life. With being able to provide this program eligible households will be able to maintain their individual wealth and eventually be able to transfer the wealth. This can lead to the benefit of homeownership as home repairs can be costly and depending on the need of repair, such as a roof, the structural integrity of the house could be effected if properties are not repaired.

Since the initial intent of this program is to only help existing homeowners this will help the applicants maintain homeownership of their units or provide them with a new unit of comparable comparison, if the units are either required to be replaced or are newly constructed because the units are in disrepair.

Since units that are pre-1976 must be replaced, the potential Lead Based Paint hazards will be eliminated from households that reside in pre-1976 units. Units will be inspected for asbestos and removal will also occur through rehab.

Being able to provide handicap accessible modifications will also benefit eligible households whom made need the modifications to be able to have a better quality of life whether it be through a ramp to reach the entrance or potentially a conversion from a tub to a shower with a seat. Since Las Vegas is located within the desert, the ability to have air conditioning is a vital component to households in surviving the elements of heat.

# **Unit Effect**

With improvements to housing units, the service life of the major components of the units will be extended. For example if roofing, or HVAC systems are replaced, the warranty on the shingles or the system will be an additional benefit to this assistance. The benefit of replacing units or newly constructing units is that they should not need any additional investment in the future since they will be brand new.

# **Identified Alternative Options Effect**

While the overall effect may not change, if activities change during the course of implementing the grant there could be a larger impact to neighborhoods vs. individuals. For example if funds become targeted to an existing manufactured housing park then there will be a larger long-term effect for the residents within that particular park as they will be the households benefiting from the infrastructure investment.

If funds become targeted to the Jade Park subdivision then the transformation of the neighborhood may become more apparent although funding that goes into the Jade Park subdivision will still be concentrated on an individual household basis.

Statement of	Applicant Name: City of Las Vegas	Vegas									
8. Construction Costs	1	too tinii	to Cooperation		Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program
oa. Aulillistiative allu legal expenses 10% Adminstration-Grant Program Coordinator	1	900,000	\$ 500,000	\$ 500,000							1
Subtotal - Administrative and legal expenses			\$ 500,000	\$ 200,000							
8b. Land, structures, rights-of way, appraisal, etc	Quantity	Unit Cost	틡	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
			(基本) 計畫 突厥 (	\$2000 SK/88 MARKS							
Subtotal - Land, structures, rights-of way, Sc. Relocation expenses and payments	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program
Relocation for units being replaced	25	11000	\$ 275,000	\$ 275,000							
S.ihivisi Delovation exnenses and narments			\$ 275.000	\$ 275.000							
Substitute and enrineering fees	Ouanfity	Unit Cost	#		Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Developer Pre-Construction Costs	25	10000	\$ 250,000	\$ 250,000							
Subtotal - Architectural and engineering fees 8e. Other architectural and engineering fees	Quantity	Unit Cost	\$ 250,000 SECTION SECT	\$ \$ Jou,uuu	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
			· · · · · · · · · · · · · · · · · · ·	THE STATE OF THE S							
Subtotal - Other architectural and engineering fees 81. Project inspection fees	Ouantity	nuit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program
Subtotal - Project inspection fees	10 10 10 10 10 10 10 10 10 10 10 10 10 1			87796 11661A 11661S							

	Applicant Name: City of Las Vegas	Vegas									
8q. Site work	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Permanent Concrete Slabs	25	15000	\$ 375,000	\$ 375,000							
Subtotal : Site work			\$ 375,000	\$ 375,000			-				
8th Demolition and removal	Value	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Demolition and removal of existing units	25	10000	\$250,000	\$ 250,000							
Subtotal - Demolition and removal			\$250,000	\$ 250,000							
M CONSTITUTE OF THE PROPERTY O	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Replacement Housing Units	25	114,000	\$ 2,850,000	\$ 2,850,000							
Rehabbed Units	20	25,000	\$ 500,000	\$ 500,000		\$ 200,000					
Subtoral - Construction			\$ 3,350,000	\$ 3,350,000		\$ 200,000					
8j. Equipment	Quantity	Unit Cost	1 151 1	HUD Share	Applicant Match	4.TableShe133	Other Federal Share	State Share	Local/Tribal	Gilber G	Program
			報報 報題								
Subtotal - Equipment			3100					i	; !		
8k. Contingencies	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Share		Income
			1176								
Subtotal - Contingencies			nis	Will				Š		1	
8l. Miscellaneous	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Inbai	- Cune	Income
Subtotal Microllanding				***************************************							
Total Construction Costs			\$5,000,000	\$ 5,000,000		\$ 200,000					

Grant Application Detailed Budget Worksneet	jet Work	sneet						ОЩ	OMB Number 2501-0044 Expiration: 2/28/2027	1-0044 )27	
Applicant Name: City of Las Vegas	: City of Las	Vegas						, ,			
9. Other Direct Costs	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Office HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
ltem											
			1000								
			2 400								
			100								
			2227264								
				William Control							
Total Other Direct Costs											
	A SOPRANCE STREET										
Subtotal of Direct Costs											
10 Indirect Costs	Rate	Base	Estimated Cost	HUD Share	Applicant Match	Offier HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Offher	Program Income
Type											
			310932	2000							
				1							
Total Indirect Costs											
Total Estimated Costs			\$ 5.000.000	\$ 5.000,000		\$ 200,000					
Iolal Estimated Costs				•							

OMB Number: 4040-0004 Expiration Date: 11/30/2025

Application for	Federal Assista	nce SF-424				
		* 2. Type of All New Continua	ation *	If Revision, select appropr Other (Specify):	riate letter(s):	
* 3. Date Received: Completed by Grants.go	v upon submission.	4. Applicant ic	lentifier:			
5a. Federal Entity Ide	entifier:			5b. Federal Award Ider	ntifier:	
State Use Only:		, , , , , , , , , , , , , , , , , , , ,				
6. Date Received by	State:	7. St	ate Application I	dentifier:		
8. APPLICANT INF	ORMATION:					
* a. Legal Name:	ity of Las Veg	jas				
* b. Employer/Taxpa	yer Identification Nu	mber (EIN/TIN):		* c. UEI:		
d. Address:				HOSSIZMWWOXS		
* Street1: Street2: * City: County/Parish: * State: Province: * Country: * Zip / Postal Code: e. Organizational	Las Vegas  NV: Nevada  USA: UNITED S 891016318					
Department Name:		-		Division Name:		
Neighborhood &	Services			Grants Division	1	
Prefix: Middle Name:	nct information of p	person to be c	ontacted on ma	atters involving this ap	oplication:	]
Title: Administr	ator					_
Organizational Affilia						
* Telephone Numbe	er: 702-229-238	1		Fax Numb	per:	<u> </u>
*Email: mriley@	lasvegasnevada	a.gov				

Application for Federal Assistance SF-424
* 9. Type of Applicant 1: Select Applicant Type:
C: City or Township Government
Type of Applicant 2: Select Applicant Type:
Type of Applicant 3: Select Applicant Type:
* Other (specify):
* 10. Name of Federal Agency:
Department of Housing and Urban Development
11. Catalog of Federal Domestic Assistance Number:
14.024
CFDA Title:
Community Development Block Grant- PRICE Competition
* 12. Funding Opportunity Number:
FR-6700-N-99
* Title:
Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Competition
13. Competition Identification Number:
FR-6700-N-99
Title:
Fiscal Years 2023 and 2024 Preservation and Reinvestment Initiative for Community Enhancement
(PRICE) Competition MODIFICATION
14. Areas Affected by Project (Cities, Counties, States, etc.):
Council-Ward Map.pdf Add Attachment Delete Attachment Wiew Attachment
* 15. Descriptive Title of Applicant's Project:
The City of Las Vegas will utilize funds to mainly focus on repair, rehab, reconstruct & newly construct Manufactured housing within its jurisdiction.
Constitute Managed Housing within 163 jurisdiction.
Attach supporting documents as specified in agency instructions.
Add Attachments Delete Attachments View Attachments

Application for F	ederal Assistanc	e SF-424				
16. Congressional I	Districts Of:	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,				
* a. Applicant 1,	,3,4			* b. Program/Projec	t 1,3,4	
Attach an additional li	st of Program/Project (	Congressional Districts if ne	eded.			
		Add	Attachment	Delete Attachmen	t View Attachment	
17. Proposed Proje	ct:					
* a. Start Date: 10/	01/2024			* b. End Dat	<b>e</b> : 09/30/2030	
18. Estimated Fund	ling (\$):					
* a. Federal		5,000,000.00				
* b. Applicant		0.00				
* c. State		0.00				
* d. Local		0.00				
* e. Other		0.00				
* f. Program Income		0.00				
* g. TOTAL		5,000,000.00				
* 19. ls Application	Subject to Review B	y State Under Executive	Order 12372 Prod	ess?		
a. This applicati	ion was made availat	le to the State under the	Executive Order 1	2372 Process for re	eview on	
		but has not been selected	by the State for r	eview.		
c. Program is n	ot covered by E.O. 12	2372.				
		/ Federal Debt? (If "Yes,	' provide explana	tion in attachment	.)	
Yes	<b>∑</b> No					
If "Yes", provide ex	planation and attach	Descriptor (Control of Control of				
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herein are true, co comply with any re subject me to crimi	omplete and accurat sulting terms if I acc	e to the best of my kno	wledge. I also p that any false, fi	rovide the require ctitious, or fraudule	** and (2) that the statements d assurances** and agree to ent statements or claims may	
** I AGREE						
** The list of certifications as specific instructions.	ations and assurances	, or an internet site where	you may obtain the	nis list, is contained	in the announcement or agency	
Authorized Repres	entative:		•			
Prefix: Mrs	•	* First Nam	e: Arcelia			
Middle Name:						
* Last Name: Bara	ajas					
Suffix:						
* Title: Depar	tment of Neighbo	rhood Services Dir	ector			
* Telephone Number	702-229-2264		Fax	Number:		
* Email: abarajas	@LasVegasNevada	gov				
* Signature of Author	rized Representative:	Completed by Grants.gov upor	submission. *	Date Signed: Com	pleted by Grants.gov upon submission.	
						·

# Applicant/Recipient Disclosure/Update Report

# U.S. Department of Housing and Urban Development

OMB Number: 2501-0017 Expiration Date: 01/31/2026

Applicant/Recipient	Information * UEI Number:	HJS3TZHWWJX5		* Report Type:	INITIAL
Applicant/Recipient	t Name, Address, and Phone (inclu	de area code):			
* Applicant Name:					
* Street1:					*
Street2:					
* City:					
County:					
* State:					
* Zip Code:					
* Country:	USA: UNITE	D STATES			
* Phone:					
2. Employer ID Numbe	er (do not include individual social s	security numbers):			
* 3. HUD Program Nar					
	opment Block Grant- PRICE	Competition			
	opmone broom crame rives	oompouroren			
* 4. Amount of HUD A	ssistance Requested/Received: \$				
5. State the name and	d location (street address, City and	State) of the project	or activity:		
* Project Name:	,	, , ,			
* Street1:					
Street2:					
* City:					
County:					
* State:					
* Zip Code:					
* Country:	USA: UNITED	STATES			
Part I Threshold D	)eterminations				
terms do not inclu	for assistance for a specific projectude formula grants, such as public block grants. For further informati	housing operating	the jurisdiction of activity in this a	of the Department (Fpplication, in excess	t to receive assistance within HUD), involving the project or of \$200,000 during this fiscal formation, see 24 CFR 4.9.
Yes	No No		Yes	☐ No	
If you answered "No certification at the en	o" to either question 1 or 2, Stop	o! You do not need	to complete the rema	ainder of this form.	However, you must sign the

# Part II Other Government Assistance Provided or Requested / Expected Sources and Use of Funds. Such assistance includes, but is not limited to, any grant, loan, subsidy, guarantee, insurance, payment, credit, or tax benefit. Department/State/Local Agency Name: \* Government Agency Name: Government Agency Address: \* Street1: Street2: \* City: County: \* State: \* Zip Code: \* Country: \* Type of Assistance: \* Amount Requested/Provided: \$ \* Expected Uses of the Funds: Department/State/Local Agency Name: \* Government Agency Name: Government Agency Address: \* Street1: Street2: \* City: County: \* State: \* Zip Code: \* Country: \* Type of Assistance: \* Amount Requested/Provided: \$ \* Expected Uses of the Funds: Note: Use additional pages if necessary. Add Attachment | Delete Attachment View Attachment

Part III Interested Parties. You must disclose	<b>)</b> :				
All developers, contractors, or consultants involve project or activity.	ved in the application for as	sistance or in the planning, deve	lopment, or impleme	ntation of the	
* Alphabetical list of all persons with a reportable financial interest in the project or activity (for Individuals, give the last name first)	* Unique Entity ID	* Type of Particlpation in Project/Activity	* Financial Ir Project/Activ		
			\$		%
			\$		
			\$		 %
			\$		
			\$		       
Any other person who has a financial interest in assistance (whichever is lower).  * Alphabetical list of all persons with a reportable financial interest in the project or activity (For individuals, give the last name first)	the project or activity for wi	nich the assistance is sought tha  * Type of Participation in Project/Activity	* Financial Ir		of the
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·			\$		%
Note: Use additional pages if necessary.		Add Attachment Dele	ete Attachment	View Attachm	ient
Certification					
I/We, the undersigned, certify under penalty of perj Warning: If you knowingly make a false statement the United States Code. In addition, any person whon-disclosure, is subject to civil money penalty no	on this form, you may be s no knowingly and materially	ubject to criminal and/or civil pen violates any required disclosure	alties under Section	1001 of Title luding intentic	18 of nal
* Signature:			* Date: (mm/dd/yyy	/y)	
Completed Upon Submission to Grants.gov			Completed Upon to Grants		
<u> </u>			L		

### Instructions

### Overview.

- A. Coverage. You must complete this report if:
  - (1) You are applying for assistance from HUD for a specific project or activity **and** you have received, or expect to receive, assistance from HUD in excess of \$200,000 during the fiscal year;
  - (2) You are updating a prior report as discussed below; or
  - (3) You are submitting an application for assistance to an entity other than HUD, a State or local government if the application is required by statute or regulation to be submitted to HUD for approval or for any other purpose.
- B. Update reports (filed by "Recipients" of HUD Assistance): General. All recipients of covered assistance must submit update reports to the Department to reflect substantial changes to the initial applicant disclosure reports.

# Line-by-Line Instructions.

# Applicant/Recipient Information.

All applicants for HUD competitive assistance, must complete the information regulred in blocks 1-5 of form HUD-2880:

- 1. Enter the full name, address, city, State, zip code, and telephone number (including area code) of the applicant/recipient. Where the applicant/recipient is an individual, the last name, first name, and middle initial must be entered.
- 2. Entry of the applicant/recipient's EIN, as appropriate, is optional. Individuals must not include social security numbers on this form.
- 3. Applicants enter the HUD program name under which the assistance is being requested.
- 4. Applicants enter the amount of HUD assistance that is being requested. Recipients enter the amount of HUD assistance that has been provided and to which the update report relates. The amounts are those stated in the application or award documentation. NOTE: In the case of assistance that is provided pursuant to contract over a period of time (such as project-based assistance under section 8 of the United States Housing Act of 1937), the amount of assistance to be reported includes all amounts that are to be provided over the term of the contract, irrespective of when they are to be received.
- 5. Applicants enter the name and full address of the project or activity for which the HUD assistance is sought. Recipients enter the name and full address of the HUD-assisted project or activity to which the update report relates. The most appropriate government identifying number must be used (e.g., RFP No.; IFB No.; grant announcement No.; or contract, grant, or loan No.) Include prefixes.

# Part I. Threshold Determinations - Applicants Only

Part I contains information to help the applicant determine whether the remainder of the form must be completed. Recipients filing Update Reports should not complete this Part.

If the answer to **either** questions 1 or 2 is No, the applicant need not complete Parts II and III of the report but must sign the certification at the end of the form.

# Part II. Other Government Assistance and Expected Sources and Uses of Funds.

A. Other Government Assistance. This Part is to be completed by both applicants and recipients for assistance and recipients filing update reports. Applicants and recipients must report any other government assistance involved in the project or activity for which assistance is sought. Applicants and recipients must report any other government assistance involved in the project or activity. Other government assistance is defined in note 4 on the last page. For purposes of this definition, other government assistance is expected to be made available if, based on an assessment of all the circumstances involved, there are reasonable grounds to anticipate that the assistance will be forthcoming.

Both applicant and recipient disclosures must include all other government assistance involved with the HUD assistance, as well as any other government assistance that was made available before the request, but that has continuing vitality at the time of the request. Examples of this latter category include tax credits that provide for a number of years of tax benefits, and grant assistance that continues to benefit the project at the time of the assistance request.

The following information must be provided:

- 1. Enter the name and address, city, State, and zlp code of the government agency making the assistance available.
- 2. State the type of other government assistance (e.g., loan, grant, loan insurance).
- 3. Enter the dollar amount of the other government assistance that is, or is expected to be, made available with respect to the project or activities for which the HUD assistance is sought (applicants) or has been provided (recipients).
- 4. Uses of funds, Each reportable use of funds must clearly identify the purpose to which they are to be put. Reasonable aggregations may be used, such as "total structure" to include a number of structural costs, such as roof, elevators, exterior masonry, etc.
- B. Non-Government Assistance. Note that the applicant and recipient disclosure report must specify all expected sources and uses of funds both from HUD and any other source that have been or are to be, made available for the project or activity. Non-government sources of Form HUD-2880 funds typically include (but are not limited to) foundations and private contributors.

### Part III. Interested Parties.

This Part is to be completed by both applicants and recipients filing update reports. Applicants must provide information on:

- 1. All developers, contractors, or consultants involved in the application for the assistance or in the planning, development, or implementation of the project or activity and
- 2. Any other person who has a financial interest in the project or activity for which the assistance is sought that exceeds \$50,000 or 10 percent of the assistance (whichever is lower). Note: A financial interest means any financial involvement in the project or activity, including (but not limited to) situations in which an individual or entity has an equity interest in the project or activity, shares in any profit on resale or any distribution of surplus cash or other assets of the project or activity, or receives compensation for any goods or services provided in connection with the project or activity. Residency of an individual in housing for which assistance is being sought is not, by itself, considered a covered financial interest.

The information required below must be provided.

- 1. Enter the full names and addresses. If the person is an entity, the listing must include the full name and address of the entity as well as the CEO. Please list all names alphabetically.
- 2. Entry of the Unique Entity Identifier (UEI), for non-Individuals, or city of residence, for individuals, for each organization and person listed is **optional**.
- 3. Enter the type of participation in the project or activity for each person listed: i.e., the person's specific role in the project (e.g., contractor, consultant, planner, investor).
- 4. Enter the financial interest in the project or activity for each person listed. The interest must be expressed both as a dollar amount and as a percentage of the amount of the HUD assistance involved.

Note that if any of the source/use information required by this report has been provided elsewhere in this application package, the applicant need not repeat the information, but need only refer to the form and location to incorporate it into this report. (It is likely that some of the information required by this report has been provided on SF 424A, or on various budget forms accompanying the application.) If this report requires information beyond that provided elsewhere in the application package, the applicant must include in this report all the additional

information required. Recipients must submit an update report for any change in previously disclosed sources and uses of funds as provided in Section I.D.5., above.

### Notes

calculated.

- 1. All citations are to 24 CFR Part 4, which was published in the Federal Register. [April 1, 1996, at 63 Fed. Reg. 14448.]
- 2. Assistance means any contract, grant, loan, cooperative agreement, or other form of assistance, including the insurance or guarantee of a loan or mortgage, that is provided with respect to a specific project or activity under a program administered by the Department. The term does not include contracts, such as procurements contracts, that are subject to the Fed. Acquisition Regulation (FAR) (48 CFR Chapter 1).

  3. See 24 CFR §4.9 for detailed guidance on how the threshold is
- 4. "Other government assistance" is defined to include any loan, grant, guarantee, insurance, payment, rebate, subsidy, credit, tax benefit, or any other form of direct or indirect assistance from the Federal government (other than that requested from HUD in the application), a State, or a unit of general local government, or any agency or instrumentality thereof, that is, or is expected to be made, available with respect to the project or activities for which the assistance is sought.
- 5. For the purpose of this form and 24 CFR Part 4, "person" means an individual (including a consultant, lobbyist, or lawyer); corporation; company; association; authority; firm; partnership; society; State, unit of general local government, or other government entity, or agency thereof (including a public housing agency); Indian tribe; and any other organization or group of people.

# U.S. Department of Housing and Urban Development

OMB Number: 2501-0017 Expiration Date: 01/31/2026

## Instructions for the HUD-424-B Assurances and Certifications

As part of your application for HUD funding, you, as the official authorized to sign on behalf of your organization or as an individual, must provide the following assurances and certifications, which replace any requirement to submit an SF-424-B or SF-424-D. The Responsible Civil Rights Official has specified this form for use for purposes of general compliance with 24 CFR §§ 1.5, 3.115, 8.50, and 146.25, as applicable. The Responsible Civil Rights Official may require specific civil rights assurances to be furnished consistent with those authorities and will specify the form on which such assurances must be made. A failure to furnish or comply with the civil rights assurances contained in this form may result in the procedures to effect compliance at 24 CFR §§ 1.8, 3.115, 8.57, or 146.39.

By submitting this form, you are stating that all assertions made in this form are true, accurate, and correct.

As the duly representative of the applicant, I certify that the applicant:

*Authorized	d Represer	itative Name:				_
Prefix	<b>«</b>		*First Name:			
Middl	le Name:					
*Last	Name:					
Suffix	c:					
*Title:						
*Applicant	Organizatio	on:			7	

- 1. Has the legal authority to apply for Federal assistance, has the institutional, managerial and financial capability (including funds to pay the non-Federal share of program costs) to plan, manage and complete the program as described in the application and the governing body has duly authorized the submission of the application, including these assurances and certifications, and authorized me as the official representative of the application to act in connection with the application and to provide any additional information as may be required.
- 2. Will administer the grant in compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C 2000(d)) and implementing regulations (24 CFR part 1), which provide that no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or otherwise be subject to discrimination under any program or activity that receives Federal financial assistance OR if the applicant is a Federally recognized Indian tribe or its tribally designated housing entity, is subject to the Indian Civil Rights Act (25 U. S.C. 1301-1303).
- Will administer the grant in compliance with Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), as amended, and implementing regulations at 24 CFR part 8, the American Disabilities Act (42 U.S.C. §§ 12101 et.seq.), and implementing regulations at 28 CFR part 35 or 36, as applicable, and the Age Discrimination Act of 1975 (42 U.S. C. 6101-07) as amended, and implementing regulations at 24 CFR part 146 which together provide that no person in the United States shall, on the grounds of disability or age, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity that receives Federal financial assistance; except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.
- 4. Will comply with the Fair Housing Act (42 U.S.C. 3601-19), as amended, and the implementing regulations at 24 CFR part 100, which prohibit discrimination in housing on the basis of race, color, religion sex (including gender identity and sexual orientation), disability, familial status, or national origin and will affirmatively further fair housing; except an applicant which is an Indian tribe or its instrumentality which

- is excluded by statute from coverage does not make this certification; and further except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.
- 5. Will comply with all applicable Federal nondiscrimination requirements, including those listed at 24 CFR §§ 5.105(a) and 5.106 as applicable.
- 6. Will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601) and implementing regulations at 49 CFR part 24 and, as applicable, Section 104(d) of the Housing and Community Development Act of 1974 (42 U.S.C. 5304(d)) and implementing regulations at 24 CFR part 42, subpart A.
- 7. Will comply with the environmental requirements of the National Environmental Policy Act (42 U.S.C. 4321 et.seq.) and related Federal authorities prior to the commitment or expenditure of funds for property.
- That no Federal approprlated funds have been paid, or will be paid, by or on behalf of the applicant, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, and officer or employee of Congress, or an employee of a Member of Congress, in connection with the awarding of this Federal grant or its extension, renewal, amendment or modification. If funds other than Federal appropriated funds have or will be paid for influencing or attempting to influence the persons listed above, I shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying. I certify that I shall require all subawards at all tiers (including sub-grants and contracts) to similarly certify and disclose accordingly. Federally recognized Indian Tribes and tribally designated housing entities (TDHEs) established by Federallyrecognized Indian tribes as a result of the exercise of the tribe's sovereign power are excluded from coverage by the Byrd Amendment, but State-recognized Indian tribes and TDHs established under State law are not excluded from the statute's coverage.

I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct.

WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802).

*Sig	nature:

Completed Upon Submission to Grants.gov

\*Date:

Completed Upon Submission to Grants.gov

# **DISCLOSURE OF LOBBYING ACTIVITIES**

Complete this form to disclose lobbying activities pursuant to 31 U.S.C.1352

OMB Number: 4040-0013 Expiration Date: 02/28/2025

1. * Type of Federal Action:	2. * Status of Feder	al Action:	3. * Report Ty	pe:
a. contract	a. bid/offer/applicati	ion	a. initial filin	g
b. grant	b. initial award		b. material	change
c. cooperative agreement	c, post-award			
e. loan guarantee			,	
f. loan insurance				
4. Name and Address of Reporting	Entity:			
Prime SubAwardee				
*Name City of Las Vegas				·
*Street 1 495 South Main Street	s	treet 2	· · · · · · · · · · · · · · · · · · ·	
* City Las Vegas	State NV: Nevada			ZIp 891016318
Congressional District, if known: 1,3,4				
5. If Reporting Entity in No.4 is Subav	wardee, Enter Name	and Address of Pri	me:	
4		<b>y</b>		
6. * Federal Department/Agency:		7. * Federal Prog	ram Name/Des	cription:
Housing and Urban Development		Community Development	: Block Grant- PRI	CE Competition
		CFDA Number, if applica	ble: 14.024	
8. Federal Action Number, if known:		9. Award Amoun	t, if known:	
		\$		
10. a. Name and Address of Lobbyin	a Pogletrant:			
Prefix *First Name N/A	y Registrant.	Middle Name		
*Last Name		N/A		
N/A	·	Suffix		
* Street 1 N/A	S	Street 2 N/A		
* City N/A	State			Zip
b. Individual Performing Services (incl	uding address if different from No	10a)		
Prefix * First Name	during address if different from No.	Middle Name		
*Last Name		N/A Suffix		
N/A * Street 1	1.9	Street 2		
* City	State	5.100.2		7/2
N/A	State			Zip
<ol> <li>Information requested through this form is authorized reliance was placed by the tier above when the trans the Congress semi-annually and will be available for \$10,000 and not more than \$100,000 for each such the</li> </ol>	action was made or entered into, public Inspection. Any person wh	This disclosure is required pu	rsuant to 31 U.S.C. 1352	2. This information will be reported to
* Signature: Completed on submission to Gra	nts.gov			
*Name: Prefix Mrs. *First Nan		Middle N	ame	
* Last Name	TIT CETTA		fix	
Barajas				
Title: Department of Neighborhood Services D:	Telephone No.:	702-229-2264	GEORGE PARTY CONTRACTOR CONTRACTO	ed on submission to Grants.gov
निवनसी <del>प्रक</del> ालतापुर				orized for Local Reproduction dard Form - LLL (Rev. 7-97)

OMB Number: 4040-0007 Expiration Date: 02/28/2025

# **ASSURANCES - NON-CONSTRUCTION PROGRAMS**

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

# PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE:

Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

- Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
- Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
- Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
- Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- 5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
- Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to:

   (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352)
   which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education
   Amendments of 1972, as amended (20 U.S.C.§§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation

- Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U. S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse: (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism: (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (i) the requirements of any other nondiscrimination statute(s) which may apply to the application.
- 7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
- 8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

- Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
- 10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- 11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe. Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
- Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.

- 13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
- 14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
- 15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
- Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
- 17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
- Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
- 19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
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OMB Number: 4040-0009 Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

# PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant:, I certify that the applicant:

- Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
- Will give the awarding agency, the Comptroller General
  of the United States and, if appropriate, the State,
  the right to examine all records, books, papers, or
  documents related to the assistance; and will establish
  a proper accounting system in accordance with
  generally accepted accounting standards or agency
  directives.
- 3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
- 4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
- 5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
- 6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.

- Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
- Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
- 10. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29) U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statue(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statue(s) which may apply to the application.

- 11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
- 12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
- 13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
- 14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- 15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of

- Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
- Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
- Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
- 18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
- 19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
- 20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
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APPLICANT ORGANIZATION	DATE SUBMITTED
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SF-424D (Rev. 7-97) Back

# **Appendix B.I Entitlement Local Government**

# PRICE CERTIFICATIONS FOR ENTITLEMENT LOCAL GOVERNMENT APPLICANTS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing.

The Uniform Relocation and Real Property Acquisition Policies Act of 1970, as amended (URA), and Residential Anti-displacement and Relocation Assistance Plan (RARAP) -- It will comply with the acquisition and relocation requirements of the URA (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR part 24. It has in effect and is following a RARAP as required under 24 CFR part 42 in connection with any activity assisted with funding under either the Community Development Block Grant or HOME programs.

Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

- 1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
- 2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
- 3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** -- The submission of the PRICE application is authorized under state and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with PRICE funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

**Section 3** -- It will comply with Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR part 75.

**Build America, Buy America (BABA)** – It will comply with Title IX, subpart A of the Infrastructure Investment and Jobs Act of 2021 (41 U.S.C. 8301 et seq.).

**Public Participation** – It is in full compliance with the PRICE streamlined public participation requirements found in Section VI.E of the PRICE NOFO.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR parts 91 and 570.

Following a Plan -- It is following a current consolidated plan that has been approved by HUD. Use of Funds -- It has complied with the following criteria:

- 1. <u>Maximum Feasible Priority</u>. With respect to activities expected to be assisted with PRICE funds, it has developed its proposal to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The proposal may also include activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional PRICE Certification).
- 2. Overall Benefit. The aggregate use of PRICE funds shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons.
- 3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with PRICE funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements. However, if PRICE funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with PRICE funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than PRICE funds. In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than PRICE funds if the jurisdiction certifies that it lacks PRICE funds to cover the assessment.

# Excessive Force -- It has adopted and is enforcing:

- 1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
- 2. A policy of enforcing applicable state and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K and R; and EPA's lead-based paint rules

(e.g., Repair, Renovation and Painting; Pre-Renovation Education; and Lead Training and Certification (40 CFR part 745)).

**Compliance with RFRA** -- The grant will be conducted and administered in conformity with the requirements of the Religious Freedom Restoration Act (42 U.S.C. 2000bb) and 24 CFR 5.109, allowing the full and fair participation of faith-based entities.

**Environmental Review** -- It will comply with environmental review procedures and requirements at 24 CFR part 58.

Compliance with Laws -- It will comply with applicable laws.

Signature of Authorized Official

Date
Director N.S Title

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# Grant Application Detailed Budget Worksheet

		Federal Share):
	•	(Expressed as a percentage of the
		Match
100%	100%	Federal Share:
100.0%	5,000,000.00	<b>Total:</b>
0.0%	0.00	10 Indirect Costs
%0.0	0.00	9 Other Direct Costs
100.0%	5,000,000.00	8 Construction
%0.0	0.00	7 Contracts and Sub-Grantees
%0.0	00'0	6 Consultants
0.0%	00'0	5 Supplies and Materials
%0.0	00.00	4 Equipment
%0'0	00.0	3 Travel
%0.0	00.0	2 Fringe Benefits
%0.0	00'0	1 Personnel (Direct Labor)
Percent of Total	Estimated Cost	Analysis of Total Estimated Costs
	tion of Budget	Detailed Description of Budget

Previous versions of HUD-424-CBW are obsolete.

form HUD-424-CBW (2/2003)