



HUD Pathways to Removing Obstacles to Housing (PRO Housing) Application

Prepared by the Department of Neighborhood Services October 2023

Table of Contents

Narrative Exhibit A: Executive Summary.....	1-2
Narrative Exhibit B: Threshold Requirements and Other Submission Requirements.....	3-4
Narrative Exhibit C: Need.....	5-11
Narrative Exhibit D: Soundness of Approach.....	12-23
Narrative Exhibit E: Capacity.....	24-27
Narrative Exhibit F: Leverage.....	28-30
Narrative Exhibit G: Long-Term Effect.....	31-38

Attachments

Land Commitment Letter

EPA Leverage Documentation

Budget Worksheet

Standard Form 424 (SF-424) Application for Federal Assistance

Assurance (HUD 424-B)

Applicant Disclosure Report Form 2880

Certification Regarding Lobbying

Code of Conduct/Ethics

Summary of Comments received on published Application and list of commenters by
name/organization

DRAFT

Narrative Exhibit A: Executive Summary

City of Las Vegas

The Historic Westside, encompasses approximately 497 acres and is bounded by Owens Avenue to the north, Interstate 15 to the east and south, and Martin Luther King Blvd. to the west. The history of the Historic Westside dates to 1904 when J.T. McWilliams began selling lots in the McWilliams town site and segregation began to build the Historic Westside. Integration, redlining, and transportation policy would lead to the decline and disinvestment of the Historic Westside. By the 1930's, due to the development of the Hoover Dam and WWII, the Westside grew exponentially, particularly by the African American population who were starting their own businesses and purchasing properties as they were not granted business licenses elsewhere in the city.

Many households would arrive during WWII to work for the Las Vegas Army Air Gunnery Range (now known as Nellis Air Force Base), Basic Magnesium, Inc. and the hotel casino industry. Due to segregation, the Historic Westside would become home to many prominent African American entertainers of the time, such as Sammy Davis Jr., Lena Horne, Nat King Cole, and Louis Armstrong. Black entertainers would perform in the hotels and casinos on the Las Vegas Strip but were not permitted to lodge in the venues. Therefore, Black entertainers would stay in the Historic Westside at places such as the former Harlem Club, Brown Derby, the Ebony club, and Moulin Rouge, which was marketed as "America's First Interracial Hotel" whereby black employees would be waiters, waitresses and blackjack dealers.

With the passage of Civil Rights legislation in the 1960's, African American entertainers remained in the hotels and casinos along the strip and thus the patronage that followed entertainers to the Historic Westside declined. With less patronage and the construction of Interstate 15, the Westside was cut off from downtown Las Vegas. For several decades financial investment would decline in the community culminating in its current state.

Currently, the African American population located within the Historic Westside has declined since its peak during the 20th century, comprising of just over fifty-one percent (51%) of the population, while thirty-five percent (35%) identify as Hispanic. The median household income is just under \$25,000/year while citywide the median household income is just over \$57,000/year. Thirty-Two percent (32%) of the housing stock is single family housing while most residents rent their homes. The City of Las Vegas, the Southern Nevada Regional Housing Authority and several churches own many vacant properties within the Historic Westside.

The city initially began the discussion to redevelop the Historic Westside in the 1990's but internal and external factors such as the Great Recession of 2008 and a global pandemic hobbled any progress trying to be implemented. It would be the development of the HUNDRED Plan in 2016 that would reinvigorate the community in hopes of change. The HUNDRED Plan, led by students at the University of Nevada Las Vegas in conjunction with residents and stakeholders in the Historic Westside developed a new vision for the community.

Following the HUNDRED Plan, the City of Las Vegas developed the HUNDRED Plan in Action and received approval of a Neighborhood Revitalization Strategy Plan for the Historic Westside in 2020. Concurrently, the Southern Nevada Regional Housing Authority submitted and received approval for a Choice Neighborhood Grant, for planning purposes, targeting the redevelopment of the Marble Manor which is located at the southern portion of the Historic Westside.

Marble Manor, a 235-unit public housing development was originally established in 1953. Since 1953 multiple expansions occurred leading to the total site encompassing thirty-five (35) acres. A 2014 portfolio assessment of the Southern Nevada Regional Housing Authority properties identified Marble Manor as a property difficult to lease. Of the 682 residents living in Marble

Manor, eighty-one percent (81%) identify as Black and eleven percent (11%) identify as Hispanic. The median income is lower for residents within Marble Manor than the Historic Westside at large and the population under 18 at Marble Manor is fifty-six percent (56%) compared to twenty-eight percent (28%) for the larger Historic Westside.

Through the planning process conducted during the Choice Neighborhood Grant, the Neighborhood Revitalization Strategy Area Plan and the HUNDRED Plan, key components were identified to guide the redevelopment of the whole Historic Westside and specifically Marble Manor:

Goal 1: Infrastructure Improvements

Goal 2: Build Affordable Housing

Goal 3: Redesign and Implement Street Improvements

Goal 4: Economic and Human Capital Development

Goal 5: Implement a Vacant Lot, Abandoned Homes Program.

This application identifies one (1) eligible activity (affordable housing) utilized through one (1) project (Marble Manor) and one (1) program (Infill Development Housing Program):

- **Marble Manor:** Requested funding will be utilized toward the re-development of Marble Manor particularly Phase 1 which is identified via the Choice Neighborhood Initiative. Phase 1 consists of demolition of existing public housing structures, reconfiguration of street layout and the construction of one hundred thirty-eight (138) housing units of which one hundred and eight (108) units will be affordable.
- **Infill Development Housing Program:** Requested funding will be utilized toward offsetting development costs for twenty-five (25) vacant properties the City of Las Vegas currently owns. Once properties are transferred to developers, reimbursement for such costs as engineering designs, surveying, permitting and environmental reviews will be eligible with these funds.

This funding will help continue the progress being made in the Historic Westside as new affordable housing (Goal # 2) will be developed and momentum will continue on the Vacant Lot, Abandoned Homes Program (Goal #5).

DRAFT

Narrative Exhibit B: Threshold Requirements and Other Submission Requirements

City of Las Vegas

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. October 30, 2023.

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 activity within this application will benefit low and moderate-income persons. Although some units within Marble Manor may not be designated for low-and moderate-income households the city will only reimburse based on a pro-rated basis corresponding to the number of units that are qualified for low-to-moderate income households.

Eligible Activity: Construction of Affordable Housing

For the Infill Development Program all funds being requested will be utilized for the development of Affordable Housing pertaining to the permitting, engineering, environmental reviews, etc. soft cost items for the development of housing on the Infill sites.

Marble Manor Phase 1 will consist of constructing one hundred and eight (108) out of one hundred and thirty-eight (138) units of affordable housing.

Threshold Eligibility

The City of Las Vegas is located within Clark County, Nevada which has been identified as a priority geography due to the measure of widespread housing cost burden or substandard 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. Other Submission Requirements

The City of Las Vegas is confirming that the following documents have been attached to this application as 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)
- Grant Application Detailed Budget Worksheet (424-CBW)
- Pro Housing Certifications

DRAFT

Exhibit C: Need
City of Las Vegas

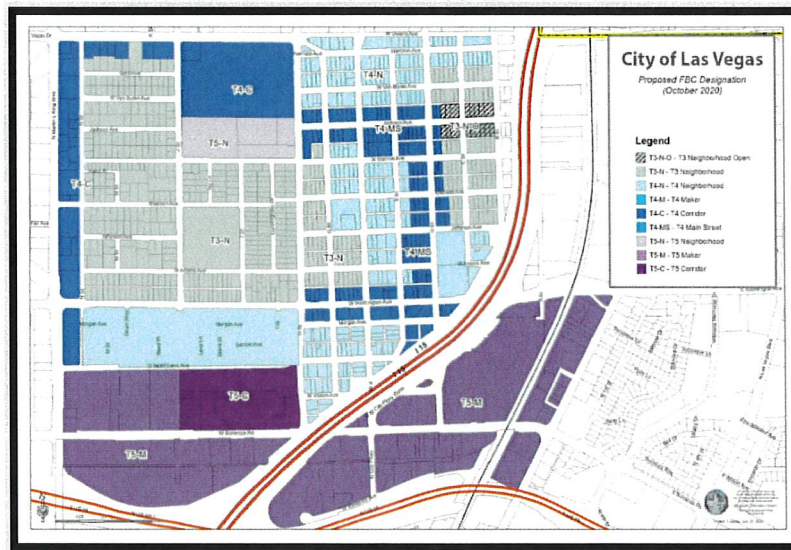
I. City Policy

The city's role in affordable housing production and preservation is to provide policy regulation, resources, and infrastructure. The city does not manage or construct affordable housing but develops collaborations with developers to produce new units and preserve existing affordable housing stock. Providing affordable housing throughout the city promotes vibrant mixed income communities.

The city has taken seven (7) specific measures to address barriers to affordable housing including:

- 1) Providing Gap Financing and Issuing Abatement Letters: The City provides gap financing to developers to address the development cost barrier to affordable housing while providing the developer a letter documenting the use of federal funds in the project, therefore, qualifying the project for property tax abatement. These actions reduce the net operating income (NOI) required of the development, allowing the developer to maintain lower rents.
- 2) Negotiates Additional Affordable Units Within the Development: When federal HOME Investment Partnerships Funds are utilized as part of a development, there are a corresponding number of units that are designated as HOME Units. In leveraging HOME funds, the City negotiates the number of units to be considered HOME Units, and therefore affordable units, compared to the number of units the developer may have wished to originally consider as HOME units.
- 3) Neighborhood Assistance Program: This program allows volunteers to work together with the City to assist homeowners facing financial hardship. The program, managed by the City Code Enforcement, also assists elderly and disabled homeowners to clean up their properties to preserve and improve residential neighborhoods. Volunteers may consist of individuals or groups that can help with landscaping, painting, light exterior maintenance, and yard clean-up.
- 4) Updated Zoning Code (Figure 1): As of October 2018, the City of Las Vegas implemented a Form-Based Code (FBC), a place-based planning approach that supports walkable, mixed-use, and compact urban environments rather than suburban development and sprawl. A FBC is an alternative to a conventional zoning code. The City of Las Vegas has also updated the Historic Westside Code as indicated in Figure 1 below:

Figure 1: Historic Westside Form Based Code



A FBC addresses the relationship between building facades and the public realm (i.e. the public and private space between buildings), the form and mass of buildings in relation to one another, and the scale and types of streets and blocks. An important aspect of a FBC is that they are not just design guidelines; indeed, they replace the existing zoning standards and regulations and have the same regulatory effect as any other zoning regulation.

Along with the new FBC Zoning, the City of Las Vegas implemented density and height bonuses, as well as financial incentives for the development or maintenance of affordable housing. The administration and enforcement of the density bonus, height bonus and financial incentive provisions of this Chapter is intended to be a coordinated effort between the Director of Community Development and the Director of Neighborhood Services, including their respective designees.

A project seeking a density bonus is eligible for a bonus to the number of units allowed in excess of the number otherwise permitted by the General Plan. A project seeking a height bonus allows an additional height in excess of the height otherwise permitted by the General Plan or applicable zoning district. A project seeking financial incentives in the form of fee reductions subject to approval by the City Council after considering the recommendations of the Director of Community Development and the Director of Public Works. Fee types that might be subject to reduction include development-related fees, building permit fees, and impact fees.

- 5) *City Rehabilitation Program*: To help preserve housing the City of Las Vegas has also established the Safe Home Improvement Funding and Training Program (SHIFT) which is a proactive approach to assist the community in addressing potential code enforcement 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 viability. Homeowners may be provided funds and technical assistance to repair, improve, preserve, and remove health and safety hazards from dwellings as well as assistance with bringing their home

into compliance with Municipal Code and/or remediating issues related to Code. During 2021-2023 the SHIFT program aided 184 homeowners.

The Las Vegas Lead Hazard Control & Healthy Homes Program is a component of the Safe Home Improvements Funding and Training Program (SHIFT) program established by the City of Las Vegas, Department of Neighborhood Services. The program is funded by a \$3.3 million dollar grant from the U.S. Department of Housing and Urban Development, Office of Healthy Homes and Lead Hazard Control. The primary goal of the program is to create lead-safe and healthy housing in Las Vegas, Nevada and reduce the incidence of childhood lead poisoning. The program aims to enroll a total of 100 homes over a four-year period.

- 6) *Abandoned Lot Program*: The newest program in which the City has acquired a number of properties within the Historic Westside for redevelopment. Under this program the abandoned properties will ultimately be gifted at little to no cost to developers to build affordable housing.
- 7) *Affordable Housing Bonus and Incentive Program*: In January 2023, The City of Las Vegas City Council approved an Ordinance that allows for density bonuses, height bonuses and financial incentives be offered to affordable housing developers that maintain affordable units to low-to-moderate income households for the required 30-year affordability period. The bonuses, incentives and fee reductions applied, would be based on zoning districts and the percentage of affordable housing units proposed.

II. Timeframe of Efforts

The policies established above came about through plans and initiatives. The City of Las Vegas first adopted the West Las Vegas Plan on March 2, 1994 to guide capital improvements and distributions of public and private funds in the Historic Westside. The plan would be updated in 2006 to incorporate previous plans, land use plans and guiding activities to generate private investment, commercial projects and housing units in the area. In 2016, The Historic Urban Neighborhood Design Redevelopment (HUNDRED) Plan was completed between stakeholders of the Historic Westside community and the UNLV Downtown Design Center.

Following the success of the redevelopment of the Historic Westside School the city of Las Vegas began identifying how to gather resources to advance the HUNDRED Plan, including holding additional stakeholder meetings with the community and subject matter experts. Upon completing this, the HUNDRED Plan in Action was released in 2020 which identified three (3) key investment areas; one of which is to establish a mixed-income, mixed-use community through investment in redevelopment of the Marble Manor Public Housing site. The City of Las Vegas also submitted and received approval from the U.S. Department of Housing and Urban Development (HUD) for a Neighborhood Revitalization Strategy Area Plan (NRSA) for the Historic Westside. The NRSA identified five (5) Goals to guide development in the Historic Westside. The five goals included infrastructure improvements, building affordable housing, re-design and implement street improvements, economic and human capital development, and implementing a vacant lot, abandoned homes program.

In conjunction with the Southern Nevada Regional Housing Authority, the City of Las Vegas was awarded a Choice Neighborhood Initiative Grant by HUD for the Marble Manor Neighborhood to create a vision of the neighborhood. After various stakeholder meetings, surveys

and interviews, a new vision was developed. The vision consists of redeveloping the site to include 600+ mixed income units (today there are 235 public housing units) including townhouses, apartments in small buildings, and apartments in larger building with elevators. The housing will serve all people including seniors, people with disabilities & special needs, families with children and adults. Additional potential amenities have been identified in the plan including, an early childhood center, amphitheater, splash pad & playground, dog park, and a community garden.

III. Additional Investment

A bill was passed in the 2023 Nevada Legislature which will provide \$32,200,000 in Nevada State general funds to build supportive housing. The City of Las Vegas applied for and was awarded \$8,289,072 in HOME ARP funding in May 2023. Given the present housing situation and high cost of affordable housing development, 73% of the funding will be allocated toward the development of affordable housing units. The City expects that HOME-ARP funds will be one source of funding in projects receiving additional types of housing development funds. The priority need for the City is to increase available affordable housing units for those at greatest risk of housing instability. Development of additional units will help to reduce the gap in available affordable housing units for low-income households and reduce the risk of homelessness.

IV. Other Factors

There are other factors contributing to the need of affordable housing as identified below. According to the threshold calculations provided by HUD, Clark County Nevada is identified as a priority geography due to widespread housing cost burden or substandard housing. The Nevada Housing Division 2022 Annual Housing Report indicated that the number of public or subsidized units affordable to households at 50% area median income (AMI) and below in the City of Las Vegas was just thirteen percent (13%) of the existing need for subsidized units. As of December 2022, existing affordable housing units for households at fifty (50%) AMI and below in the City of Las Vegas were 6,025. Comprehensive Housing Affordability Strategy (CHAS) 2015-2019 data indicates 45,125 very low-income households are in need of affordable housing, creating a deficit of 39,100 units. There is not enough affordable housing to meet the need.

A.) Housing Cost Burden: Table 1 below illustrates that, among City of Las Vegas households with severe cost burden, Black, Indigenous, and Persons of Color (BIPOC) are disproportionately impacted.

Table 1: Renter Households with Severe Cost Burden, by Race and Ethnicity

Race/ethnicity	# with severe cost burden	# households	% with severe cost burden
White, non-Hispanic	8,915	44,630	19.98%
Black, non-Hispanic	7,580	21,410	35.40%
Hispanic	7,575	33,070	22.91%
Asian or Pacific Islander, Non-Hispanic	1,225	6,435	19.04%

Native American, non-Hispanic	200	510	39.22%
Other, Non-Hispanic	1,025	3,620	28.31%
Total	26,540	109,675	24.20%

Source: CHAS, 2015-2019; Table includes all HAMFI categories

In 2022, the City of Las Vegas collaborated with Clark County to consult a wide variety of community partners to identify gaps in housing and determine the greatest housing needs for the populations served. Stakeholders throughout the community emphasized the need for affordable housing, pointing to a large gap between the number of affordable units and the number of people in need of affordable housing. Over the last few years, availability of rental units has become limited, and rents have increased.

As part of the Consolidated Planning Process the City has also identified the following conditions of residential structures and the year that units were built in Table 2 and Table 3.

B.) Housing Condition:

Table 2: Housing Units with Selective Issues

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	33,025	29%	48,925	47%
With two selected Conditions	690	1%	5,105	5%
With three selected Conditions	105	0%	270	0%
With four selected Conditions	8	0%	0	0%
No selected Conditions	78,355	70%	49,130	48%
Total	112,183	100%	103,430	100%

Source: 2011-2015 ACS

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 3: Age of Housing Stock

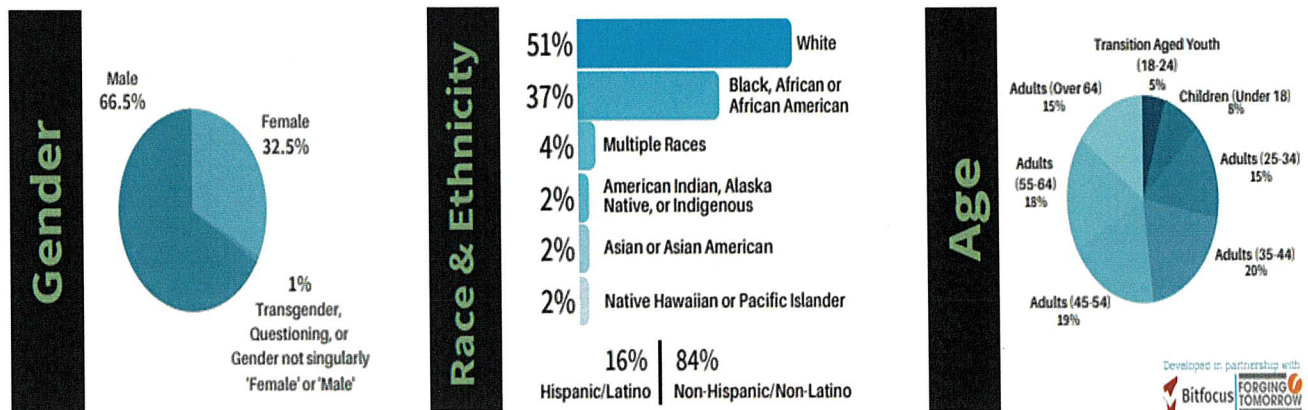
Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	31,275	28%	25,054	24%
1980-1999	56,943	51%	51,390	50%
1950-1979	22,584	20%	24,985	24%
Before 1950	1,375	1%	1,995	2%
Total	112,177	100%	103,424	100%

Source: 2011-2015 CHAS

C.) Homelessness: According to the 2023 Point-In-Time Count which was conducted on January 25, 2023 there were a total of 6,566 people experiencing homelessness in Southern Nevada. Of this amount 40% were considered sheltered either in an emergency shelter (79%) or transitional housing (21%) and 60% were considered unsheltered either at the Courtyard Resource Center (3%) or on the street, outdoors, vehicles, desert, encampments (97%).

The Demographic breakdown of the Point-in-Time County is shown in Table 4 below:

Figure 2: Demographics of Homeless Population



- *Gender*

As indicated 66.5% of the population identifies as male, 32.5% identify as female, and 1% identify as transgender, questioning, or gender not singularly female or male.

- *Race & Ethnicity*

The racial breakdown of the population consists of 51% white, 37% Black, African, or African American, 4% Multiple Races, 2% American Indian, Alaska Native, or indigenous, 2% Asian or Asian American and 2% Native Hawaiian or Pacific Islander. 16% identified as Hispanic/Latino and 84% identified as non-Hispanic/non-Latino.

D.) Affordability: There is insufficient 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. But 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.

E.) Financing Construction and Timeframe: Financing affordable housing is a major challenge requiring the use of many funding sources for each development. The availability of subsidy to finance affordable housing is limited and it is important for the city to continue to seek additional funding sources specifically for affordable housing. In addition, the city is exploring reworking existing incentives to provide more value to the development community.

One key barrier that exists to producing more affordable accessible housing is infrastructure constraints. In particular, the Marble Manor redevelopment project has the goal of adding an additional 400 units of housing to the area but the existing infrastructure will not be adequate for the demand. Another barrier to the Historic Westside location is land use controls as the City of Las Vegas has purchased several vacant properties within the area.

DRAFT

Narrative Exhibit D: Soundness of Approach

City of Las Vegas

I. Vision

As identified in the HUNDRED Plan the Historic Westside community will be a thriving district of African American culture in Las Vegas. It will be a unique place where the world will come together to live, work, visit, and play, through the development of housing, local business, jobs, education, hospitality, and cultural pride.

Through the development of the HUNDRED Plan and the Choice Neighborhoods Plan the city has identified multiple investments to be made in the Historic Westside and Marble Manor. The Hundred Plan in Action is addressing several neighborhood deficiencies through the following completed and planned projects: Cox Innovation Center, Strong Start Mobile Pre-K Academy, Employ NV Career Hub, CSN Westside Education & Training Center and the West Las Vegas Holistic Wellness Center.

The City of Las Vegas is proposing two activities within this application.

Activity 1: Redevelopment of the Marble Manor Public Housing Site

Activity 2: Infill Development Housing Program

National Objective:

- a) **Marble Manor:** Both activities will meet a national objective of affordable housing for households below 100% of the Area Medium Income as the redevelopment of Marble Manor consists of removing 235 public housing units to be replaced with 627 units of which 489 are designated as affordable units so an increase of 254 units. Specifically phase 1, where the funding if awarded would be utilized, will have 108 affordable units which includes 53 replacement units and 55 new units. The site will include a mixture of housing choices from 1-5 bedrooms and townhomes to larger apartment buildings.

Infrastructure constraints: With the additional units added to the Historic Westside infrastructure improvement will need to be completed to accommodate the increased capacity and the vision of the community from the planning phases of both the HUNDRED Plan and the Choice Neighborhoods Initiative, the Neighborhood Revitalization Strategy Area Plan and the City's 2050 Master Plan which calls for redevelopment and the elimination of blight.

- b) **The Infill Development Housing Program:** The City of Las Vegas (City) is committed to increasing affordable housing options. As such, approximately 25 City-owned vacant parcels in the Historic Westside neighborhood are earmarked for affordable housing development. Parcels are strategically grouped together based on size and proximity to one another and then released for competitive bid. While affordability is a requirement, developers have discretion when it comes to the project type, single-family and/or multi-family affordable housing. Once the project is awarded, the city enters into a Disposition and Development Agreement (DDA) with the developer. The land is then transferred to the developer at no cost via a deferred forgivable loan or for a nominal fee. The City monitors the project throughout the entire affordability period in order to ensure compliance with income limits and other terms outlined within the DDA.

The Infill Housing Development Program will increase production of affordable housing by providing incentives to developers to make affordable housing development more

feasible. The land is provided at no cost, on the condition that the developer complies with the affordability requirements. The program also assists with costs associated with environmental assessment work. The city works with the developer throughout the planning and permitting process to ensure the project comes to fruition.

This program will help to expand homeownership opportunities. The program encourages the development of single-family homes on smaller parcels. Single-family homes must be affordable and must be sold to low-income individuals/families via an approved first-time home buyer program. This program also helps eliminate blight by encouraging the development of vacant lots. All the City owned lots slated for affordable housing development are located in the Historic Westside neighborhood. This neighborhood is historically underserved and thus the number of vacant lots located in this neighborhood is disproportionately high when compared to surrounding neighborhoods.

Infill development has many proven benefits. For one, it tends to have lower infrastructure costs, thus making infill projects attractive to developers. One of the challenges developers often face with infill development is the risk associated brownfields and potential contamination on the infill site. Herein, the City is helping to remove that barrier by assisting with the cost of environmental site assessment work.

II. Geographic Scope

The Historic Westside sits inside West Las Vegas located in Census Tract 3.01: Block Groups 2-4, spans 3.5 square miles, is centrally located in the city, and near Interstate 15 and US-95. The area is bounded by Owens on the north, US-95 on the south, I-15/Main Street to the east, and MLK Blvd on the west. The U.S. Department of the Treasury and Internal Revenue Service has certified Census Tract 3.01 an Opportunity Zone.

Existing land uses in Census Tract 3.01, Block Group 3 is 59% Residential: R-3 – Medium Density Residential, R-4 – High-Density Residential, and R-SL – Residential Small Lot. Industrial zoning comprises about 11% of land use, 13% for public facilities, and 17% mixed-use. Although there has been substantial housing development of affordable housing units in West Las Vegas over the last ten years, development in Census Tract 3.01, Block Group 3 has come to a standstill. West Las Vegas' assets include a myriad of land uses and the City has taken great effort to arrest deterioration and blight throughout this neighboring the area.

The Historic Westside has 390 housing units according to the American Community Survey 2013-2017 estimates and single-family structures make up 26 percent. Multi-unit structures or those buildings that contained two or more apartments make up the remaining 74 percent. Rental properties dominate with a rate of 63 percent. According to the August 2020 approved Historic Westside NRSA, the median property value in the area is \$77,700, which is significantly lower than that in greater West Las Vegas of \$123,600 and remarkably lower than that of the City's median home value of \$209,700. The median household income in the proposed NRSA is \$15,324; many of the households (98%) live below the poverty level with incomes below \$50,000. The number of families living below the poverty level is 29.6% in zip code 89106 and 12.1 % citywide. The population in the NRSA is 389 with a predominant Hispanic or Latino representation of 64%, African American's 33% and 3% Other.

As identified in Figure 3 and Figure 4 below Vacant land is the second largest land use category in West Las Vegas, comprising of 15.5% (248.2 acres) of the total land area. Vacant

property exists in nearly all land use categories within West Las Vegas, including residential, commercial, industrial, mixed-use and public facilities.

Figure 3: Vacant Land Inventory of Historic Westside

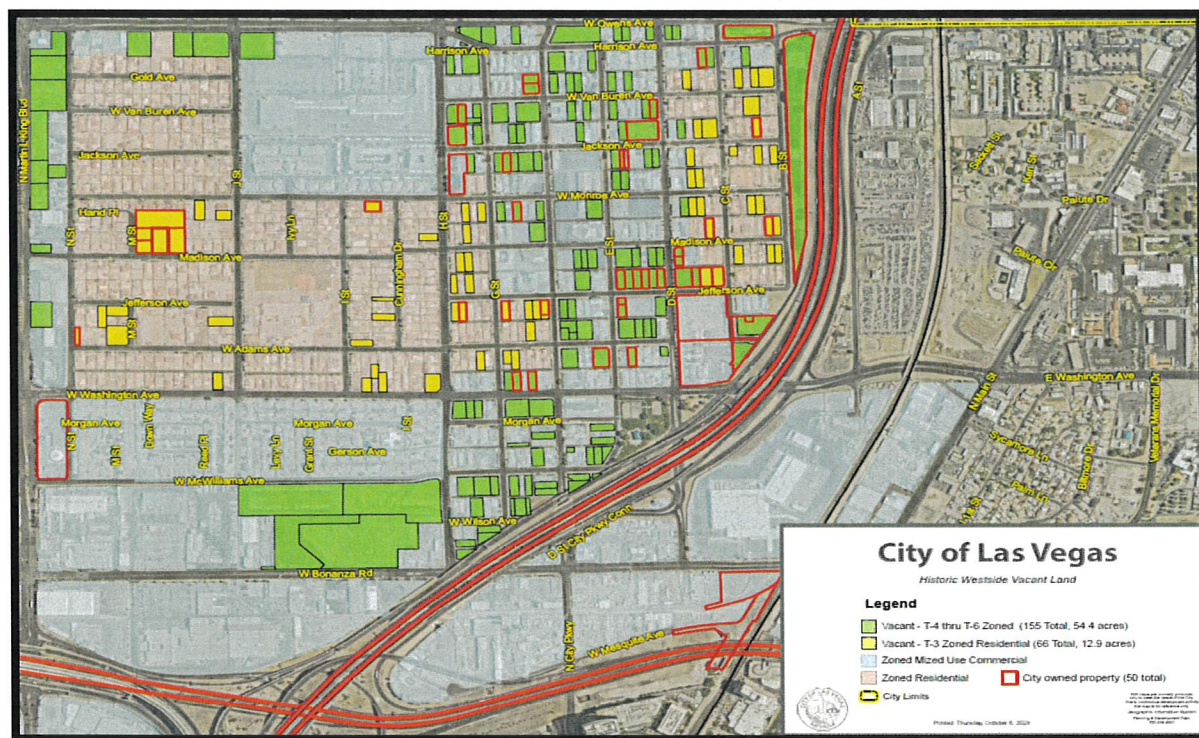


Figure 4: Proposed Redevelopment of Marble Manor



III. Community Engagement

The City of Las Vegas has been engaging residents within the Historic Westside for over a decade through planning workshops, surveys, and dialogue with key members of the community through the development of the HUNDRED Plan in 2016 for the Historic Westside community and the Choice Neighborhood Plan in 2021 for the Marble Manor location.

Process: During the Historic Westside NRSA development process, the City collected the input received by almost 200 community members and stakeholders. The stakeholders are diverse, including churches in the Historic Westside, schools located in or adjacent the Historic Westside, real estate and commercial business developers, individual landowners, community residents, private and professional associations, state and federal agencies, as well as educational and research partners. The stakeholders participated in five community outreach events and developed three concept plans. This engagement resulted in the 169-page document ‘The HUNDRED Plan’ that is a community-led historic urban neighborhood design redevelopment plan.

In 2019, approximately 60 stakeholders convened with the intent to advance the first phase of the HUNDRED Plan. The focus was on critical needs such as housing, food, jobs and targeted investments. This meeting resulted in the HUNDRED Plan in Action Phase 1. The plan specifically calls for infill housing development and affordable housing projects. The plan specifically outlines the intent to “*Infill vacant lots with new construction single family homes*”, as well as the steps that will be taken, “*Site survey to determine homes eligible for rehab and lots available for Infill; City to identify builder(s) to support Infill developments; Partner with appropriate groups to support a home ownership program*”.

The City of Las Vegas has a history of effective community engagement and continues to work with Historic Westside stakeholders on the implementation of the HUNDRED Plan. The City’s commitment to ensure ongoing community input and buy-in for implementing their vision in The HUNDRED Plan and NRSA was demonstrated during 3 Public Meetings held in July 2020. Steering Committee meetings were held and working groups were formed to help bring projects to fruition, and the community is actively engaged in redevelopment efforts. The city has launched a Historic Westside Quarterly Newsletter, and the City of Las Vegas Department of Neighborhood Service had an entire team, the Neighborhood Engagement and Community Engagement team, that consistently holds events, surveys the community, and has boots on the ground to ensure consistent and meaningful engagement from key stakeholders.

In May of 2022, the City of Las Vegas facilitated two Technical Assistance Workshops for individuals or corporations interested in Infill Housing Development in the Historic Westside. These workshops were open to all and were intended to help potential developers navigate the application process and have the support they needed to competitively bid. The workshops were well attended by a variety of stakeholders including residents, business owners, general contractors, architects, real estate agents, community advocates and developers. Due to the success of these workshops, two additional workshops were held in June and July of 2022. Workshops were held at Las Vegas City Hall, with a virtual option also available.

Technical Assistance Workshops – Infill Housing, Historic Westside

- o June 5, 2022
- o June 3, 2022
- o June 28, 2022 (Virtual)

- o June 28, 2022
- o July 22, 2022

In addition to engaging key stakeholders via Technical Assistance Workshops, the City of Las Vegas invited key stakeholders to participate in a Capacity Building Workshop which was facilitated by NeighborWorks. The workshop covered basic community development principles with a focus on the Historic Westside neighborhood. It was held at the Las Vegas City Hall.

Capacity Building Workshops, Historic Westside Neighborhood

- o May 16, 2023 – Working with Faith-Based Institutions in Community Development
- o May 17, 2023 – Community Development Principles, Practices and Strategies
- o May 18, 2023 – Community Development Principles, Practices and Strategies

As part of the Choice Neighborhoods plan, Southern Nevada Regional Housing Authority and the city hosted both targeted Marble Manor resident meetings and broader Community meetings open to the public. Since January 2022, there has been over 20+ community meetings, which gathered input from community members and included a youth engagement component, which allowed youth to learn about architecture, planning and the redevelopment process. Concurrently while the meetings were occurring surveys of the households were being conducted in which 80% participated.

While most of the formal plans have been adopted and approved the city will maintain communication with the residents of the area including updating them on everything accomplished within each year and what is going to be occurring in the upcoming year.

Key Stakeholders:

- Community partners were previously consulted including the Southern Nevada Homelessness Continuum of Care (SNHCoC), homeless and domestic violence service providers, veterans' groups, public housing agencies, public agencies that address the needs of the qualifying populations, and public/private organizations that address fair housing, civil rights, and the needs of persons with disabilities.
- Historic Westside Stakeholders include Historic Westside Churches and Schools, real estate and commercial business developers, individual landowners, community residents, private and professional associations, state and federal agencies, as well as education and research partners.
- Marble Manor residents were key stakeholders of the Choice Neighborhood Plan

Results of Engagement:

While not all the results, some key results that impacted the plans include:

- Diversification of Housing Choice needed
- In-Unit washer/dryer
- Balconies and or front porches be included in designs
- Need for affordable housing, there is a large gap between the number of affordable units and the number of people in need of affordable housing. Over the last few years, availability of rental units has become limited, and rents have increased

- Several providers described an increase in persons experiencing first time homelessness and those who are newly at-risk of homelessness. One developer commented that Clark County is short 85,000 units for those under 60% area median income. A service provider identified 3,700 persons/families in need of affordable housing that are qualifying populations. A service provider who works with survivors of domestic violence noted that their clients have housing vouchers but cannot find available units. Many service providers described long waiting lists for permanent housing.
- Redevelopment the Historic Westside school
- New Street Layout within Marble Manor

The City of Las Vegas published a Public Notice in English and Spanish in the Las Vegas Review Journal on Thursday, October 12, 2023. The notice invited the public to review the Pathways to Removing Obstacles to Housing (PRO Housing) Application and to submit written comments no later than 5:00 p.m. on Thursday, October 26, 2023.

The HUD Pathways to Removing Obstacles to Housing (PRO Housing) Application, was available by contacting the Department of Neighborhood Services or visiting our website at: <https://www.lasvegasnevada.gov/Residents/Grants>

Written comments were directed to be mailed or delivered in person to the following address: City of Las Vegas Department of Neighborhood Services, 495 S. Main St Las Vegas, NV 89101 Attention: Melanie Riley or emailed to mriley@LasVegasNevada.GOV.

A Public Hearing was held Monday, October 23, 2023 at 10:00 am in the Historic Westside School, located at 330 W. Washington Avenue, Room 112. The Public Hearing solicited comments on the proposed HUD Pathways to Removing Obstacles to Housing (PRO Housing) Application. Reasonable efforts will be made to assist and accommodate persons with disabilities or impairments.

IV. Affirmatively Furthering Fair Housing

- a.) *Diversity Equity & Inclusion*: The city of Las Vegas is working to improve well-being for all Las Vegans through diversity, equity and inclusion. In 2020, the Las Vegas City Council charged the city to strengthen its commitment to diversity, equity and inclusion (DEI) by unanimously adopting a comprehensive Resolution “Establishing the City’s Diversity, Equity and Inclusion Initiative”.

The city’s vision for this initiative is to have a vibrantly diverse community where Las Vegans have fair and just opportunities for health, social and economic well-being in their neighborhoods. To accomplish this the city has taken many steps to help ensure that the city is more accessible and impactful to the communities it serves.

To implement this vision the city of Las Vegas has partnered with unincorporated Clark County, the City of North Las Vegas, and the City of Henderson to publish the 2020 Regional Analysis of Impediments to Fair Housing. The Analysis consisted of quantitative data such as housing and socio-economic data, as well as the evaluation of existing fair housing data and fair housing complaints. The final draft was approved by City Council on March 18, 2020, and the city continues to work with the different jurisdictions to address regional fair housing concerns. Three key impediments to fair housing are identified in the Analysis:

1. "Lack of housing choice for people living in public housing and a general dissatisfaction of quality, safety and locations of some public housing properties and neighborhoods."
2. Economic barriers due to limited supply of adequate and accessible affordable housing especially for protected classes. It is identified under this impediment that fifty (50) percent of the region's renters are cost burdened and that among renters, 70% of the County's black population are renters
3. Lack of access to transportation options reduce housing and economic opportunities

There are two action items identified in the analysis of impediments that the redevelopment of Marble Manor will accomplish.

1. The redevelopment will address action item #1, which will be to address disproportionate Housing Problems and Economic Barriers which was identified during the grant allocation process. Special consideration will be given to rental housing development, which includes at least 10% accessible units and single-family housing, which includes universal design. The National Low Income Housing Coalition has identified that the state of Nevada has a shortage of 83,994 rental units for extremely low-income renters (below 30% AMI). With redeveloping Marble Manor and adding additional housing units this potentially could help reduce the shortfall the state is experiencing.

The current Marble Manor project has 235 public housing units, with the projected goal to have 600 mixed income-units. The project will increase the housing choices for individuals, including townhomes, stacked flats and apartments in small and larger buildings.

2. The second action item will address lack of access to transportation options, as the development of mixed used housing will be located along transportation routes.

One of the key components of stakeholder meetings identified connectivity issues within the current layout of Marble Manor. To combat this issue the proposed layout of the streets is designed so residents will be able to access amenities and the Historic Westside has many bus stops within the area as shown in Figure 6 below.

Figure 5: Proposed Street Layout of Marble Manor

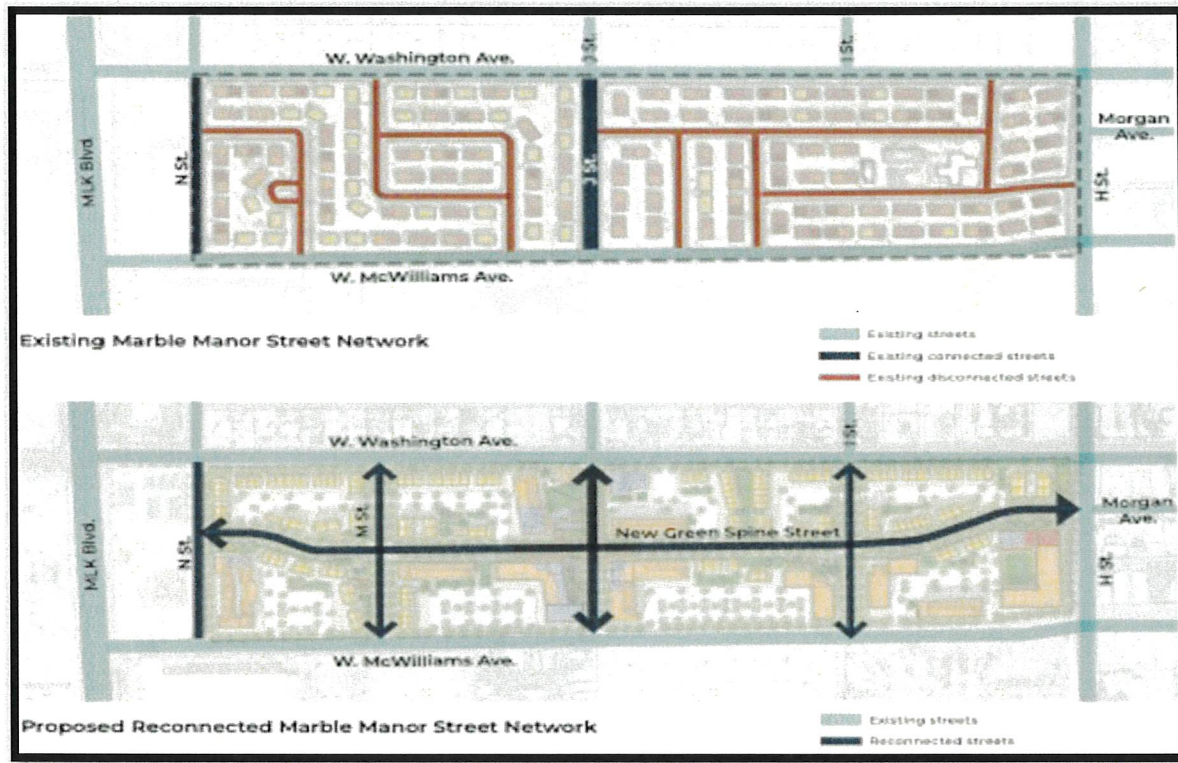
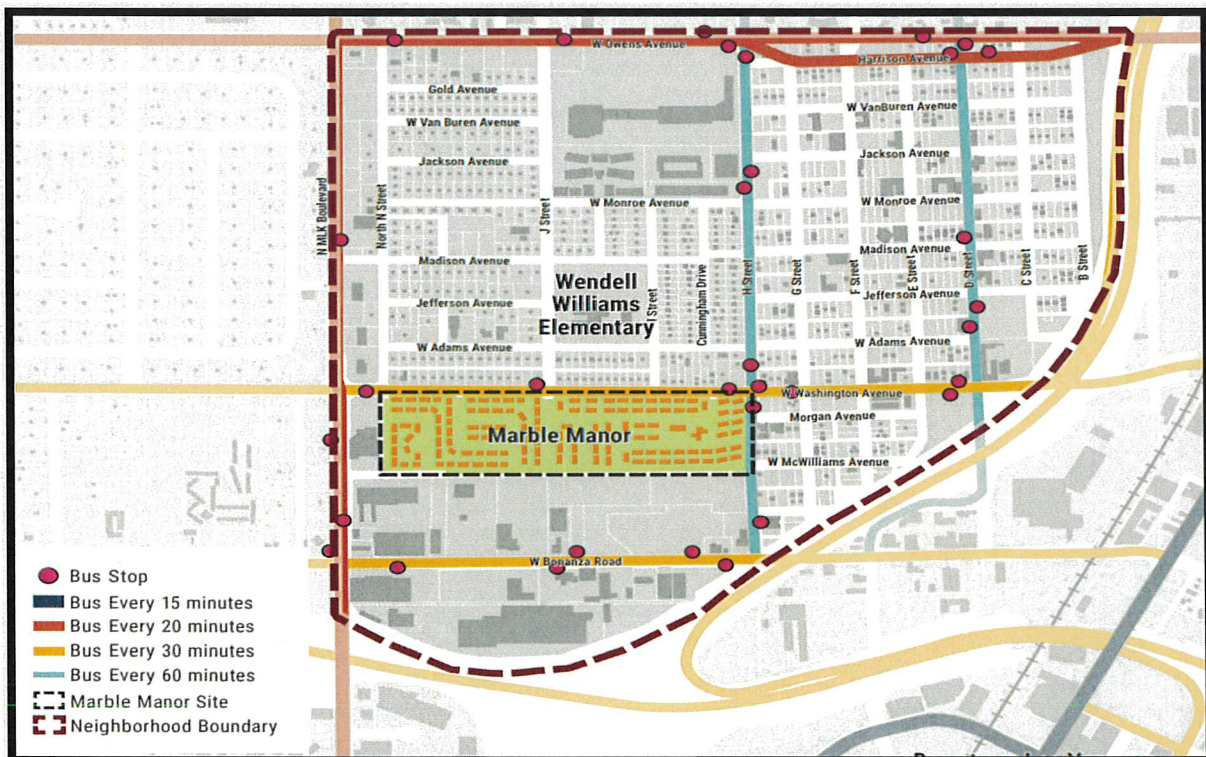


Figure 6: Connectivity to Surrounding Area



With the addition of mixed-income units throughout the Historic Westside and in particular the Marble Manor site there will be less concentration of residents who are below 80% AMI and potentially less concentration of residence who are minority as the current demographics are shown below in Table 4.

Table 4: Demographic Comparison of Marble Manor

Demographics	Marble Manor	Historic Westside	Las Vegas
Number of Households	228	1358	244299
Number of Individuals	695	4325	667679
Average Persons per Household	3	3.2	2.65
Race (African American, White, Other)*	83%, 14%, 3%	53%, 6%, 6%	12%, 43%, 12%
Ethnicity-Hispanic	12%	36%	34%
Median Age	16	31.8	37.7
Median Income	10455	24910	59707

*SNRHA classifies Hispanic as Ethnicity, not Race. Whereas American Community Survey (ACS) includes Hispanic as category of Race

To expand fair housing knowledge within the community, the city contracts with Silver State Fair Housing Council to further train, educate, and investigate housing discrimination complaints. They assisted 256 persons (2021-2023) with Housing Discrimination Counseling and Complaint Investigation Services, facilitated two Fair Housing Trainings for grant subrecipients each fiscal year, two trainings each year for City of Las Vegas staff, and one training each year for real estate and property management professionals. They also held a Public Awareness Campaign that consisted of a 90-day bus campaign, placed four advertisements in local newspapers and participated in three community outreach events. The City collaborated with Silver State Fair Housing Council and Legal Aid of Southern Nevada to host an annual Fair Housing Month event in April 2022. The virtual forum focused on housing rights, the eviction process, and tenant rights and steps to take after receiving an eviction notice.

b.) *Affirmative Marketing*: An Affirmative Fair Housing Marketing Plan (AFHM) is a marketing strategy designed to attract renters and buyers of all majority and minority groups, regardless of sex, handicap and familial status to assisted rental units and sales of dwellings that are being marketed. The City of Las Vegas, Department of Neighborhood Services has adopted, and project owners must also adopt, affirmative marketing procedures and requirements for any housing with five or more HOME-assisted units. Affirmative marketing differs from general marketing activities in that it specifically targets potential tenants and homebuyers who are least likely to apply for the housing to make them aware of available affordable housing opportunities.

As an Entitlement Community, the City of Las Vegas requires subrecipients to outline an affirmative marketing plan in their application for funding. Currently, tenant rolls and client lists are scrutinized during desk audits and monitoring visits to ensure that the subrecipients are successful in serving typically underserved populations. In addition, the City reviews subrecipient affirmative marketing plans during annual monitoring.

- c) *Additional Measures:* The Southern Nevada Regional Housing Authority promotes the Clark County Small Business Opportunity Program (SBOP), which is designed to help small business owners increase their capacity to compete for government contracts. Small businesses who enroll in SBOP receive a combination of classroom training, mentoring, coaching and relationship-building activities. Many small business graduates have gained access to contract opportunities with local government entities, institutions of higher learning and private agencies.

The SNRHA and Brinshore Development LLC will work closely to create a relocation plan and budget that is aligned with the demolition and redevelopment plan. The phasing strategy for the mixed-income housing starts in the southeast corner of the site and generally progresses from east to west. This approach minimized impact to residents by developing the densest buildings in Phase 1 to create a resource for future relocation. The goal is to only move residents once. SNRHA is confident that all families being relocated from the first phase of Marble Manor can be accommodated in other SNRHA owned developments.

It has also been identified that of the residents who are interested in returning thirty-seven percent (37%) will need a unit with special accommodations for physical, visual, and hearing needs.

V. Budget & Timeline

The City of Las Vegas is proposing the following Budget as also attached in the required form 424-CBW Budget. The major budget categories are listed below in Table 5 below with the corresponding amounts requested:

Table 5: Proposed PRO Housing Budget

Grant Application Detailed Budget Worksheet			
Category	Total Cost	PRO Housing Funding	Other Funding
Administrative and legal expenses	Estimated Total Cost	PRO Housing Application	Other
10% Administrative Costs	\$1,000,000	\$1,000,000	
Architectural, design, engineering fees, permits, environmental reviews	Estimated Cost	PRO Housing Application	Other
Infill Project Preconstruction Costs	\$1,000,000	\$1,000,000	
Site work/prep and Demolition/Removal	Estimated Cost	PRO Housing Application	Other
Marble Manor	\$21,394,028	\$1,000,000	\$20,394,028
Construction Hard Costs	Estimated Cost	PRO Housing Application	Other
Marble Manor	\$185,598,064	\$7,000,000	\$178,598,064
Contingencies	Estimated Cost	PRO Housing Application	Other
Marble Manor	\$10,349,605	\$0	\$10,349,605
Soft Costs, Financing Costs, Reserves & Escrow, Developer Fee	Estimated Cost	PRO Housing Application	Other
Marble Manor	\$70,793,805	\$0	\$70,793,805
Total Estimated Costs	\$290,135,502.00	\$10,000,000.00	\$280,135,502

1. *Marble Manor*

As requested above in Table 6 the request amount of \$8,000,000 for Marble Manor will be utilized in the identified capacity according to the budget listed below in Table 7. The city will commit that funding will be utilized during Phase 1 of the construction to ensure funds are expended by the September 30, 2029 deadline. It's anticipated the funding awarded for Marble Manor will cover the expenses to perform site work and preparation, as well as demolition and removal and any hard construction costs. This budget was determined based on the project outcome to create 600+ affordable housing units, as this is the highest need in our community, and this was absolutely the best investment to get the highest, most beneficial return.

Table 6: Proposed Marble Manor Budget by Phase

Unit Count	138	120	103	160	106	627
Total Uses	Phase I	Phase II	Phase III	Phase IV	Phase V	Total
Site Improvements	3,950,000	5,050,000	3,382,978	5,150,000	3,861,051	21,394,028
Hard Costs	34,187,800	33,350,000	32,792,020	49,780,000	35,488,244	185,598,064
Hard Cost Contingency	1,906,890	1,920,000	1,808,750	2,746,500	1,967,465	10,349,605
Other Construction Costs (insurance, bonds, FF&E etc.)	1,177,700	1,244,920	1,301,485	1,534,922	1,484,942	6,743,970
Soft Costs	2,233,000	2,379,957	2,536,356	2,807,409	2,928,109	12,884,832
Financing Costs	3,011,015	2,753,467	2,534,839	4,266,797	2,852,501	15,418,619
Reserves & Escrow	1,090,594	1,032,462	912,195	1,422,693	1,001,748	5,459,692
Developer Fee	5,575,969	5,603,801	5,322,771	7,954,275	5,829,877	30,286,694
TOTAL	53,132,968	53,334,607	50,591,394	75,662,598	55,413,936	288,135,502
Cost Per Unit	385,022	444,455	491,179	472,891	522,773	
Anticipated Approximate Offsite Utilities						\$8,000,000

2. *Infill Development Housing Program*

The City of Las Vegas will utilize up to \$1,000,000 of funds, allowing \$40,000 for each of the 25 affordable housing sites to cover pre-construction costs such as environmental reviews, permitting, and design, engineering and architectural costs. This per site cost estimate was based on prior similar projects, fee and preconstruction cost estimates, as well as possible price inflation over the next couple years. We also wanted the program to provide a substantial financial incentive, as to assist in the offset of costs to a developer. Currently, there is not any definitive budget for the individual vacant lot sites as designs are not completed. However, the city will commit that all units will be affordable and not utilize any funding that is beyond the Maximum subsidy for the HOME Program at the time the units are built.

3. *Reduction Impact*

The city will take the following steps if awarded an amount of funding below the requested amount:

Step 1: Lower the Administration amount requested to comply with the ten percent (10%) max

Step 2: Lower the amount of funding that would be allocated to each lot under the Infill Development Program

Step 3: Lower the amount of funding to phase 1 of Marble Manor

The City has prioritized the Marble Manor site and recognizes that providing additional financial assistance to developers under the Infill Development Program will only help in acquiring developers for the Historic Westside vacant lots. Since both activities are identified in the previous mentioned plans the city is committed to funding both activities to whatever extent feasible based on the awarded amount but if awarded less funding the timeframe for the Marble Manor site may be delayed and there may be less outcomes for the infill Development Program.

4. *Timeframe*

- a. *Marble Manor*: It is anticipated that Marble Manor will take a minimum of eight years to complete all phases of the development. The city is committed that awarded funding will be for phase 1 of the development to meet the deadline for funds to be expended under this grant. On October 19th, 2023, the Marble Manor project will be up for approval of \$29 million of private activity bonds at the State of Nevada Board of Finance meeting.
- b. *Infill Development Housing Program*: Since the city already owns the vacant properties, it is not anticipated that timing will be an issue to expend funds. The EPA Brownfield Grant period is to August 31, 2025, so it is anticipated that all environmental work to the vacant lots will be completed by that deadline unless there are unforeseen circumstances on individual lots. Appraisals on parcels must be completed within 6 months of land transfer. While this is being completed the City will be issuing RFP's for developers and developers will be completing pre-construction activities, which is what the funds will be reimbursing. It is expected that all the vacant lots the city owns will be developed prior to the September 2029 deadline. The city anticipates following Table 7 below for developing the program.

Table 7: Timeframe for Infill Development Program

FY24 Quarter 1	Complete due diligence on all infill housing sites ➤ Phase 1 and Phase 2 Environmental Site Assessments
FY24 Quarter 2	Draft Requests for Proposals (RFPs) for each Infill Housing Development Grouping
FY24 Quarter 3	Release applications for Infill Housing Sites
FY24 Quarter 4	Score applications and make preliminarily awards to developers
FY25 Quarter 1	Begin First Draft of Disposition and Development Agreements
FY25 Quarter 2	Finalize Drafts of Disposition and Development Agreements
FY25 Quarter 3	Appraisals on Parcels
FY25 Quarter 4	City Council Agenda ➤ Approve Sale of Land Below Fair Market Value ➤ Approval of Disposition and Development Agreement
	➤ Escrow ➤ State of Construction ➤ Completion of Construction-Units added to affordable Housing ➤ Monitoring (Affordability Period)

DRAFT

Narrative Exhibit E: Capacity

City of Las Vegas

I. Capacity

1.) City of Las Vegas (Lead Agency for Infill Development Program)

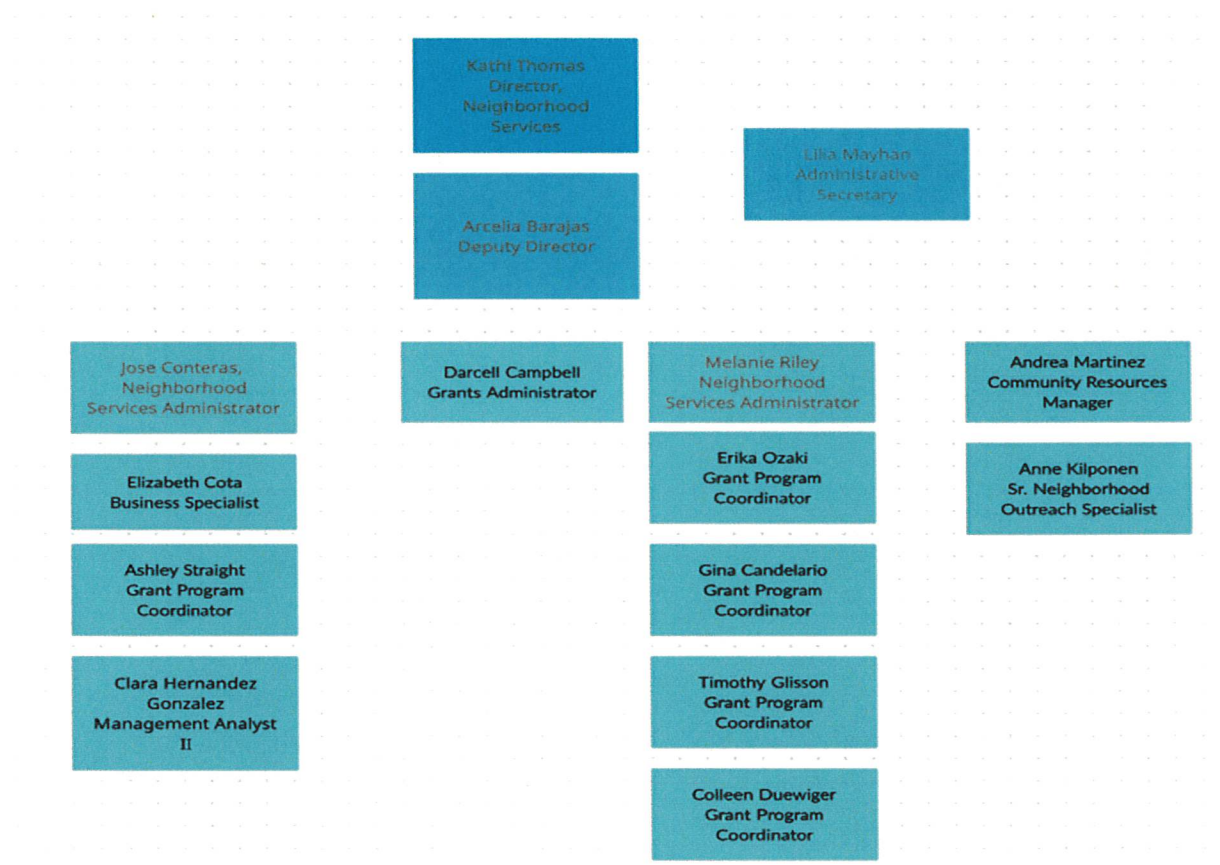
The City of Las Vegas, Department of Neighborhood Services has a 6 member Grants Team that is responsible for an estimated \$15 million in Federal and State funds each year. The Grants Team also administered an additional \$43 million in various Covid funding sources over the last few years through the U.S. Department of Housing & Urban Development and the U.S. Department of Treasury.

The City of Las Vegas Department of Neighborhood Services has managed numerous projects of this scale particularly relating to affordable housing administered via the HOME Program. The City's planning effort provides decades of experience developing neighborhood and targeted area plans, which are implemented interdepartmentally and in partnership with other local agencies.

The city initiated a five-month public outreach process as part of its 2050 Master Plan. A total of 5,120 people participated including 3,403 individuals via 1717 professional surveys, 68 community events, and 28 stakeholder meetings. The city has also made a commitment to equity and compassion adopting resolutions in November 2020 and June 2021 respectively that will shape the City's approach to engaging with its residents going forward and will be central to Historic Westside Choice planning process. At the City of Las Vegas, plans do not sit on shelves, but reflect a true commitment to successful implementation.

Even though the City of Las Vegas is an important player in addressing the affordable housing needs of its citizens, other partners are required to contribute important resources for the community to meet its needs. In fact, the city does not manage or construct affordable housing, but develops collaborations with developers to produce units and preserve existing affordable housing stock. Typically, the city utilizes federal and state funding sources such as HOME Investment Partnerships Program and Account for Affordable Housing Trust Funds in partnerships with for-profit and non-profit developers. Due to multiple funding sources having different requirements, it is important to coordinate the resources allocated to a project in the most efficient and cost-effective manner. Frequently, the initial funding commitment by the city allows a project to leverage additional dollars from the other housing funders. Over the last five years alone, the city has worked with multiple developers to produce or preserve over 1,500 units of affordable housing, completing fourteen projects ranging in size from six units to 480 units.

Figure 7: Department of Neighborhood Services Organization Chart – Key PRO Housing Team Members



2.) Southern Nevada Regional Housing Authority (Lead Agency for Marble Manor)

The Southern Nevada Regional Housing Authority (SNRHA) was formed January 1, 2010 through the consolidation of three housing authorities in the Las Vegas valley. SNRHA provides affordable housing options to approximately 48,000 households throughout Clark County. The public housing program consists of over 2,149 apartments and scattered site homes that receive federal rental subsidies for low-income families as well as disabled and elderly individuals. In addition, Affordable Housing Programs, Inc, an affiliate of the SNRHA owns and/or manages over 890 project-based voucher units that are federally subsidized and/or financed with low-income housing tax credits or tax-exempt bonds and converted under the Rental Assistance Demonstration (RAD) Program. SNRHA administers rental subsidy to over 12,000 households through the Housing Choice Voucher Program. “Table 8” below identifies the key personnel for the Southern Nevada Regional Housing Authority.

Table 8: Key Personnel for Southern Nevada Regional Housing Authority

Southern Nevada Regional Housing Authority Key Management Personnel		
Name	Position	Experience in Affordable Housing
Lewis Jordan	Executive Director	>20 years
Frank Stafford	Development Modernization Director	>20 years
Patricia Stephens	Director of Affordable Housing	>20 years
Fred Haron	Director of Finance	>20 years

3.) Brinshore Development, LLC (Marble Manor-Developer)

Established in 1994, Brinshore Development, LLC is an innovative real estate company specializing in the development of residential communities that foster conservation, collaboration and affordability. Brinshore has undertaken dozens of developments, from large-scale master planned communities to the restoration of meticulously preserved historic properties. The Brinshore portfolio today encompasses more than 11,000 residential units valued at more than \$1.3 billion in 100 communities around the country. Brinshore will work shoulder-to-shoulder with the SNRHA to transform Marble Manor into an inclusive new community that is better connected to the burgeoning economy of Las Vegas. "Table 9" below identifies the key personnel for Brinshore Development.

Table 9: Key Personnel for Brinshore Development

BRINSHORE DEVELOPMENT KEY MANAGEMENT PERSONNEL		
Name	Position	Affordable Housing Experience # of Yrs.
Richard Sciortino	Principal	>20 years
David Brint	Principal	>20 years
Whitney Weller	Senior Vice President Development Manager	>20 years
Anna Libby	Vice President Development Manager	>7 years
Carolyn Steele	Associate Development Manager	>9 years

II. Activities

- a. *Marble Manor*: All invoices for awarded funds will be on a reimbursement basis and the City of Las Vegas Department of Neighborhood Services will review invoices and issue reimbursement to either the Housing Authority or the developer depending on the path chosen if awarded funding.
- b. *Infill Development Housing Program*: The City of Las Vegas Department of Neighborhood Services will administer the Infill Program as it has site control of the parcels. The city will issue request for proposals (RFPs) for developers to build affordable housing on the parcels. The city employs an affordable housing committee consisting of staff with various expertise to assess affordable housing applications and ensure the viability of both the developer and project proposal. Once a proposal is approved, the Department of Neighborhood Services staff is active in monitoring project milestones and development progress. If a developer were to drop out of an awarded infill project, the city would either issue a new RFP or select another proposal from the initial pool of applications.

III. 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. As an entitlement community the City of Las Vegas must partake and implement the Analysis of Impediments to Fair Housing.

IV. Additional Comments

- There are currently no staff vacancies for any of the partners
- Developers for the Infill Development Program have not been procured so they cannot be included in the capacity, but the program is dependent on obtaining developers
- As Government agencies the Southern Regional Nevada Housing Authority as well as the City of Las Vegas has relevant procurement, financial, and internal control capacity.

V. 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
Colleen Duewiger, Grant Program Coordinator
Elizabeth Cota, Business Specialist

DRAFT

Narrative Exhibit F: Leverage
City of Las Vegas

To understand the amount of investment by not only the City of Las Vegas but our federal, county, state, and local partners' one must begin with the community involvement that came from outreach during the HUDRED Plan. One of the components that came from community involvement was the wish to preserve the Historic Westside School which is the oldest school in Las Vegas and while it originally was built for local Paiute children it became the main school for African American children as the Historic Westside was the only place African Americans families could reside during segregation. It was later closed in the late 1960's after desegregation was implemented. In 2015 the City of Las Vegas utilized \$12.5 million dollars to restore the school and the five-acre site. Currently the school offers the Strong Future Technology Training Center and the Small Business Support Center with plans being developed for a Workforce Education and Training Center which will focus on entry-level skills training in advanced manufacturing, construction trades, information technologies and healthcare. Preserving the Historic Westside School would begin the path of implementing the HUNDRED Plan. Continuing investment within the Historic Westside includes but is not limited to:

I. Historic Westside

- A new-mixed-used Housing Development which was approved in the fall of 2022 (Identified in the NRSA). The new structure will consist of 84 units of workforce housing with 10,000 square feet of commercial space. The City of Las Vegas is providing \$1 million in ARPA funds toward construction as well as conveying the land for \$1 per parcel.
- Groundbreaking of Jackson Avenue Complete Streets Project: \$6.5 million project to widen sidewalks and increase pedestrian safety while adding streetlights, trees and landscaping between C & H Streets with funding coming from the Regional Transportation Commission Fuel Revenue Indexing Extension Tax Fund and the U.S. Department of Commerce's Economic Development Administration.
- The US Department of Transportation awarded \$2 million through the Reconnecting Communities Pilot Program. The planning award is to support improvements along Interstate 15, Bonanza Road & F Street in the Historic Westside.
- Urban Farm were delivered to James Gay Park which will provide fresh food to local residents which was funded through MGM Resorts International \$500,000 philanthropic contribution to the Mayor's Fund for Las Vegas LIFE.
- \$198,400 from the City of Las Vegas Parks and Leisure Activity Capital Projects Fund is being utilized for the development of The Master Plan for the African American Museum and Cultural Arts Center
- \$1.8 million EDA Grant awarded to support Chef Jeff Culinary Training Program for Youth
- The Design for the West Las Vegas Workforce Training Center was completed with the estimated cost of \$6.9 million being funded through CARES Act Funding via the U.S. Economic Development Administration
- The Design for the West Las Vegas Wellness Center was completed which included \$1.6 million in funding from CDBG Funds to advance the design to completion.
- \$1.0 million in City of Las Vegas ARPA Funds as well as \$1.0 million from Clark County were committed to the expansion of Mario's Westside Market which will open in October 2023
- The Mayor's Fund for Las Vegas Life is funding \$250,000 for four large scale murals
- 150k from the Mayor's Fund to deploy the Strong Start Go Mobile Pre-K Academy at the Historic Westside School

- \$20,000 grant from the EPA to support planning of the James Gay Park for Urban agriculture
- The City of Las Vegas has also contributed 400k for the African American Museum and Cultural Arts Center
- The City of Las Vegas has also contributed 250k for the ACCED Network to bring wireless connection to the Historic Westside
- 5.25 acres of Land was purchased for the New West Las Vegas Library

II. Marble Manor

In addition to listed items above The Southern Nevada Regional Housing Authority (Grantee), with the City of Las Vegas (Co-Grantee), and EJP Consultants (Planning Coordinator) submitted a planning application for the FY2021 Choice Neighborhoods Initiative (CNI). A portion of The Historic Westside which includes the Marble Manor Public Housing Development will be the focus area of this CNI grant. The Choice Neighborhoods program leverages significant public and private dollars to support resident and neighborhood driven strategies that address struggling neighborhoods with distressed public housing through a comprehensive approach to neighborhood transformation. Stakeholders such as public housing authorities, municipalities, schools, law enforcement, business owners, nonprofits, faith-based institutions and private developers come together to create and implement a plan that revitalizes distressed HUD housing and addresses the challenges of the surrounding neighborhood.

In September 2023, the U.S. Department of Commerce awarded a \$1.3 million grant to the City of Las Vegas to support planning for the future redevelopment of Jackson Avenue, located in the Historic Westside. The grant will help local entrepreneurs in redeveloping the area and provide land development training to small and minority-owned businesses. In addition to the federal funding, the city is also setting aside \$327,870 in local funds. The funding is expected to create 82 jobs and generate \$36 million in private investment, according to department estimates.

With all of the investment listed above the region has come together to redevelop the Historic Westside and the next phase includes redevelopment of the Marble Manor site which is owned by the Southern Nevada Regional Housing Authority and developing infill properties that the City of Las Vegas owns.

III. Infill Housing Development Program

- a. Donation of Land: The City of Las Vegas has earmarked approximately 25 City-owned vacant parcels of land in the Historic Westside neighborhood for affordable housing development (Attachment A). The City will transfer the land to developers at no cost via a deferred forgivable loan or for a nominal fee on the condition that the land be utilized for affordable housing development and all affordability conditions are met. The parcels currently slated for affordable housing include the following:
 - F Street and Van Buren Avenue; APN 139-27-110-037; 0.15 acres
 - M & Madison; 2.21 acres
 - APN 139-28-303-001
 - APN 139-28-303-003;
 - APN 139-28-303-004
 - APN 139-28-303-005

- APN 139-28-303-007
- 610 W. Washington Avenue; APN 139-27-210-131; 0.16 acres
- 1012 E Street; APN 139-27-210-065; 0.11 acres
- 1014 E Street; APN 139-27-210-064; 0.05 acres
- 1016 G Street; APN 139-27-210-076; 0.16 acres
- 412 Jefferson Avenue; APN 139-27-210-057; 0.17 acres
- 410 Jefferson Avenue; APN 139-27-210-058; 0.15 acres
- 422 Jefferson Avenue; APN 139-27-210-055; 0.17 acres
- 204 Madison Ave; APN 139-27-211-012 0.15 acres
- H Street & Jackson Avenue; APN 139-27-110-069; 0.36 acres
- Van Buren & H Street; APN 139-27-110-066; 0.16 acres
- 305 Harrison Avenue; APN 139-27-111-010; 0.17 acres
- 951 E. Street APN 139-27-201-002; 0.32 acres
- 304 Madison Avenue; APN 139-27-210-055; 0.18 acres
- 210 Jackson Avenue; APN 139-27-111-045; 0.16 acres
- 713 Jefferson Avenue; APN 139-26-210-080; 0.15 acres
- 618 W. Washington Avenue; APN 139-27-210-129; 0.16 acres
- 415 W Adams Avenue; APN 139-27-210-105; 0.16 acres

- b. *Environmental Assessment Work:* The City of Las Vegas was awarded a \$500,000 Brownfield Assessment Grant (Attachment B) from the U.S. Environmental Protection Agency EPA. One of the grant's target areas is the Historic Westside Neighborhood. The city intends to utilize this funding for assessment work associated with infill housing development.

IV. City Grant Funds

While additional funding for the Infill Housing Development Program and Marble Manor project is not guaranteed, developers are not precluded from applying for City HOME funds or Community Development Block Grant (CDBG) funds for their projects and it is anticipated that either the Infill Housing Development Program or Marble Manor will utilize one or both funding sources.

V. Additional Comment

- a. *Marble Manor:* While the estimated budget for the Marble Manor project is included in Narrative D – Soundness of Approach, the final total capital funding stack has not been confirmed. The City understands that because these funds cannot be officially confirmed, they cannot be counted directly as leverage to this application. The Southern Nevada Regional Housing Authority is currently exploring various potential funding sources for the development of Marble Manor. Potential funding sources include conventional construction loans, Capital Funds, HOME funding, the Federal Home Loan Bank and Low-Income Housing Tax Credits. Again, if awarded funding the funds would be utilized during Phase 1 of the development, which would include site work and preparation, demolition and construction.

DRAFT

Narrative Exhibit G: Long-Term Effect
City of Las Vegas

Community is defined as a group of people living in the same place or having a particular characteristic in common or a feeling of fellowship with others, because of sharing common attitudes, interests, and goals. Community has always existed within the Historic Westside, but with the proposed redevelopment of Marble Manor, the Infill Development Housing program and all of the investment underway in the community, a physical and social transformation will occur. The Transformation of the Historic Westside includes many components and the City of Las Vegas believes that the physical changes will lead to better societal changes, such as reduction in crime, better education opportunities, better health and more economic investment into the Historic Westside.

I. Physical Changes

- a. *Marble Manor*: This proposal is for a portion of the overall development costs within Phase 1, which includes the demolition of all 235 public and HUD assisted housing units on site, the overall project will culminate in a new high quality mixed income housing site that is responsive to the needs of the surrounding neighborhood. The new 627 units of mixed-income housing as shown in Figures 8-10 below will address deficiencies in the current structures that include:
- *Inappropriate Building Design/Site layout/Street Connectivity*: Currently the housing structures within Marble Manor have repetitive designs, monotonous exterior materials, and a disorienting site layout that does not fit within the larger Historic Westside. There are poorly landscaped areas at the rear sides of each building that significantly reduces the ability of property management and residents to view their surroundings from the street side of the property.
 - *Inadequate Unit Sizes/Configuration*: The average square footage of the local market's apartments is approximately 892 sq. ft. per industry data. The apartments at Marble Manor average approximately 800 sq. ft. for a 1 or 2-bedroom unit, which puts Marble Manor substantially below the general market size. All Marble Manor floorplans also feature only one full bathroom. HUD and the general market consider one toilet and one shower for 3-bedroom and 4-bedroom units obsolete in comparison to the current market options. Marble Manor kitchens are undersized and have no separate dining area.
 - *Lack of Defensible Space*: There is minimal delineation of public versus private space; therefore, no one feels any ownership over the spaces outside of their units.

Figure 8: Phasing Plan for Marble Manor

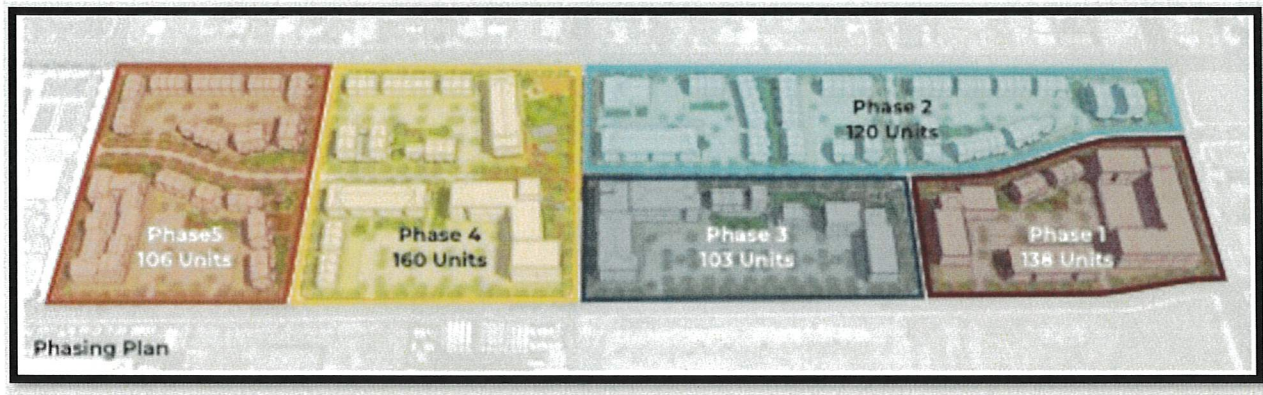


Figure 9: Affordability of Units per Phase of Development

BEDROOM MIX BY PHASE								AFFORDABILITY MIX BY PHASE					
Key	Phase	1-BR	2-BR	3-BR	4-BR	5-BR	Total	Key	Phase	Replacement	Affordable	Market	Total
	Phase 1	42	62	25	7	1	138		Phase 1	53	55	30	138
	Phase 2	34	48	26	11	1	120		Phase 2	46	46	28	120
	Phase 3	29	44	23	5	2	103		Phase 3	39	42	22	103
	Phase 4	50	74	24	11	1	160		Phase 4	60	65	35	160
	Phase 5	27	46	27	4	2	106		Phase 5	37	46	23	106
		183	274	125	38	7	627			235	254	138	627

Figure 10: Mixed-Income Housing Unit Types



- b. *Infill-Development Housing Program*: The intent of the program is for homeownership type of housing to be developed on the vacant properties. It is at the developer's discretion as to the type of housing whether it be townhomes, duplexes, single-family

homes, etc. However, with any housing being developed the physical appearance of the properties will change.

II. Social Changes

- a. Macro-Level: The City of Las Vegas believes there will be reduction in housing cost burden for many residences within the proposed redevelopment of Marble Manor due to the increase in housing options. While there will 235 units replacing the existing units there will be an addition of 254 affordable units available, which will reduce housing costs for many households that are housing cost burden currently throughout the region.

Environmental Justice is one of the most significant environmental risks in the Historic Westside. The Historic Westside neighborhood has a disproportionately high minority and low-income population. It is a historically underserved community with its economic turmoil rooted in racial segregation and redlining practices.

Once a thriving and vibrant neighborhood, today the neighborhood is plagued by vacant lots and dilapidated structures. In 2021, a brownfield inventory was conducted in the heart of the Westside. The inventory found that forty-five percent (45%) of the area was vacant lots or sites with vacant, underutilized, and/or dilapidated aging buildings, many with suspected contamination.

The Infill Housing Development Program takes these environmental justice concerns into account. As such, the City is requiring that all infill parcels be developed as affordable housing. This will help to ensure an increase in affordable housing options within the community and help to prevent residents from being priced-out of their own neighborhood. In addition, it encourages the development of single-family homes on smaller parcels and requires that such homes be sold to low-income families via a HUD-approved first-time homebuyer program. Finally, the City is providing funding towards environmental assessment work (such as Phase 1 and Phase 2 ESAs) to ensure the land is free of contamination and safe for future site occupants.

The city hopes that the Infill Housing Development Program will help decrease the racial disparity in homeownership. According to the Brookings Institute's 2019 article "*Should Las Vegas Bet on Homeownership? Trends in Housing Affordability and Homeownership*" the rate of homeownership for white and Asian households were mostly back to pre-recession levels, however homeownership for Black and Latino households were continuing to decline. For moderate income households only twenty percent (20%) of Black families and thirty-five percent (35%) of Latino families were homeowners compared to white and Asian families.

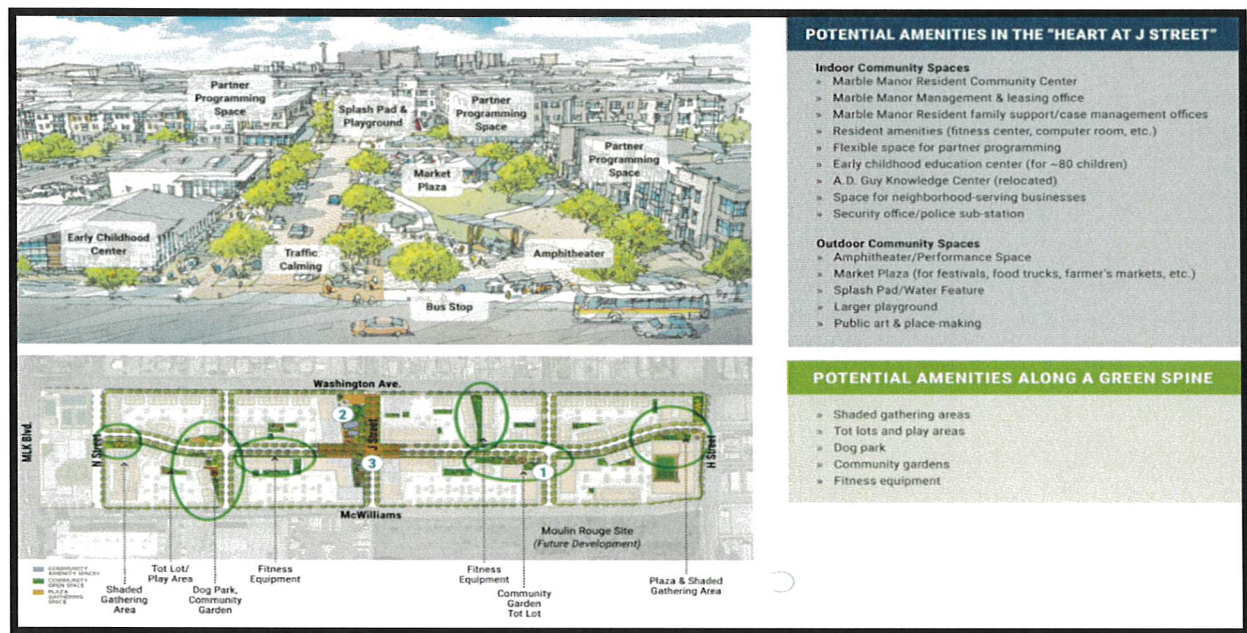
In 2021 the *Coalition to Make Homes Possible* was formed by the Urban Chamber of Commerce, Nevada Housing Division, the City of Las Vegas, National Association of Real Estate Brokers, Neighborhood Assistance Corporation of America, NID Housing Counseling Agency of Southern Nevada and AmeriFirst Financial, with the goal of helping 25,000 Black families buy their own home over the next 10 years.

- b. Micro-level (Historic Westside): The Choice Neighborhood Initiative identified multiple factors that are social impacts to the Marble Manor site and larger Historic Westside. Those four impacts are critical to improve the lives of residents within the Historic Westside. The

factors include: Recreational, Key institutions to support families and children, Institutions for education, jobs, and training, and Health and Wellness.

1. Marble Manor: From the Choice Neighborhood initiative, Figure 11 identifies the desired amenities to be included in the redevelopment of Marble Manor:

Figure 11: Amenities to Include in Design



2. Infill Housing Development Program: The Infill Development Program aligns with the HUNDRED Plan, a plan developed by community members and key stakeholders. The plan seeks to make the Historic Westside an attractive place for urban living. This involves eliminating vacant sites. Below are "The Big Moves to Neighborhood Rebirth", as outlined in the HUNDRED Plan.

- 1) Welcome to the historic Westside;
- 2) Revitalize historic Jackson Street;
- 3) Small Steps: Vacant No More;
- 4) Establish Washington Live;
- 5) Repairing the Edges;
- 6) Establish Compete & Safe Streets;
- 7) Reclaim James Gay Park; and
- 8) Moulin Rouge Entertainment District.

Herein, the Infill Housing development program focuses on 3) Small Steps; Vacant No More. Starting small involves small and incremental neighborhood infill. The project seeks to

develop vacant lots into single-family homes for first time homebuyers and multi-family affordable housing. While the focus of the Infill Housing Project is affordable housing development on vacant lots, this is being done in conjunction with the other “Big Moves” listed above. The neighborhood as a whole is undergoing a revitalization and is expected to once again become a thriving community. Affordable housing development will help to ensure low-income families are not priced out of the neighborhood, but rather can partake in the amenities that are to come.

3. *Other investments and amenities:* There is already planned investment throughout the Historic Westside as shown in the figures below and all development will take into account the existing infrastructure of the community, including how development is accessible for all populations throughout the Historic Westside:

Figure 12: Additional Investment in Historic Westside to Support Children & Families

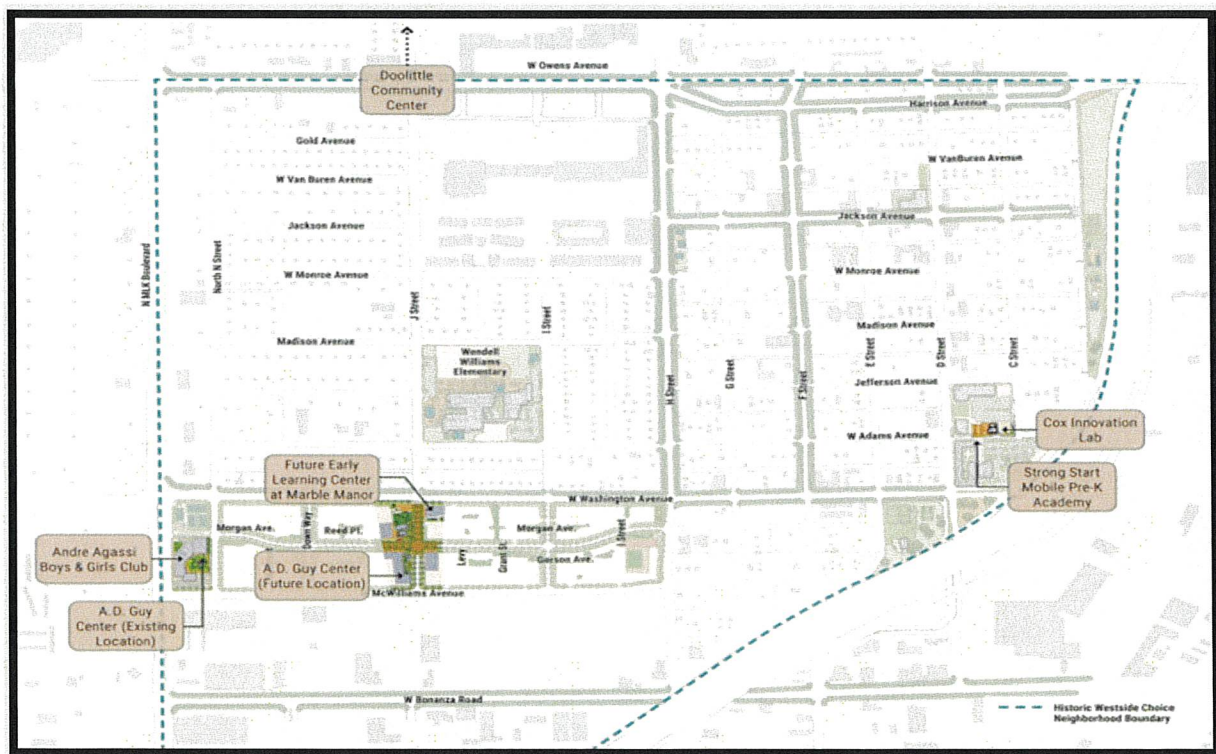


Figure 13: Additional Investment to Bolster Opportunity through Education, Training, Jobs, and Entrepreneurship

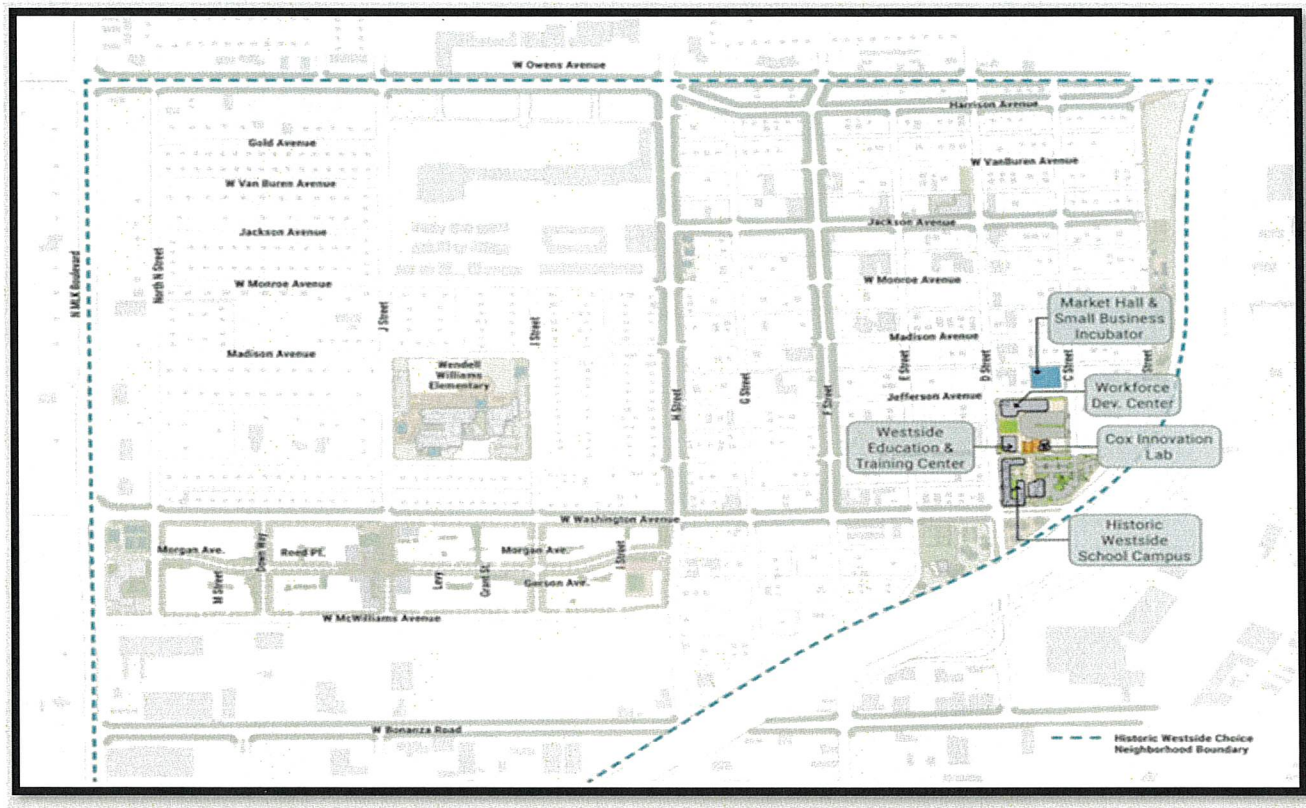
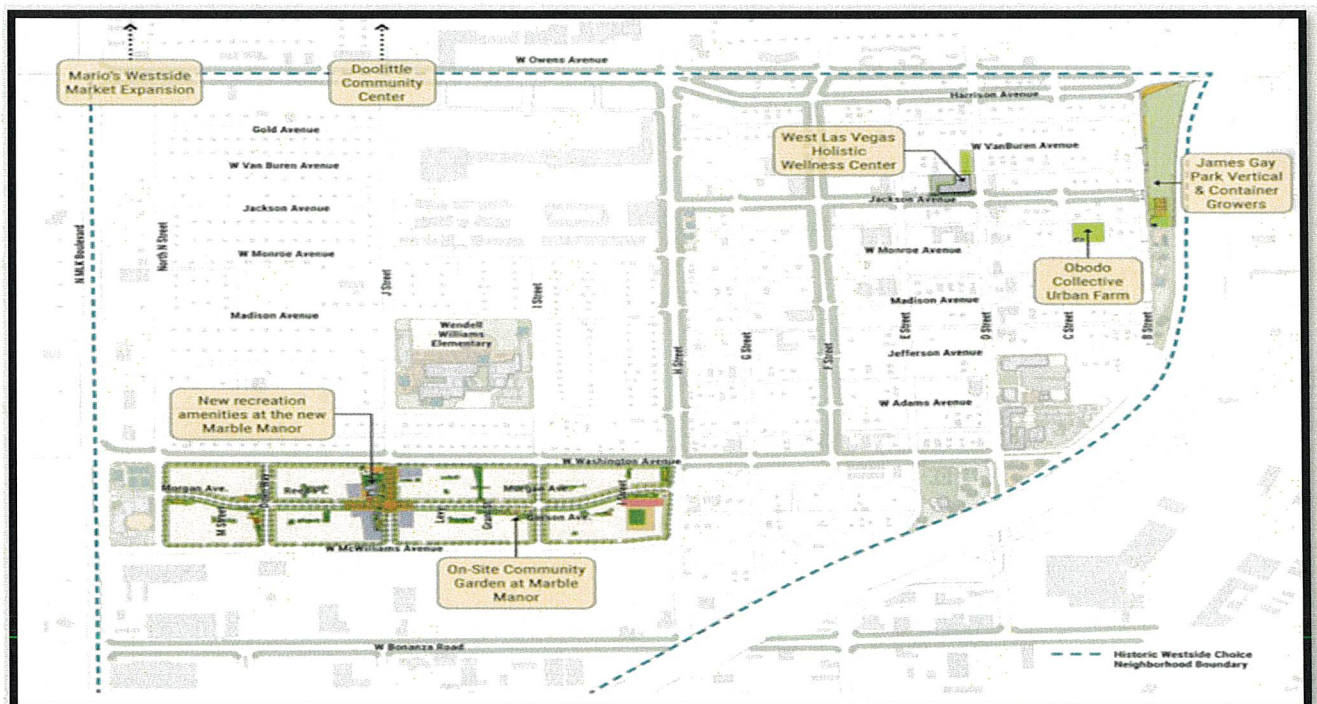


Figure 14: Investment to Foster Health & Wellness



When identifying the long-term effects of redeveloping the Historic Westside it is important to take a holistic approach, as it is not just the physical improvement to the properties but the transformation and opportunities for people that can truly lead to change. The physical changes can be the catalyst for further investment by the private sector within the Historic Westside, which in turn can provide better opportunities for the residents within the community.

Providing affordable housing has many positive effects such as a higher influx of money to be spent in local communities, fewer evictions, creates a healthier population resulting in a healthier economy, creates more job opportunities, improves government infrastructure, and produces better opportunities for investing in the future.

III. Challenges

- a. *Mable Manor*: While not necessarily roadblocks, the scale of this proposal pertaining to Marble Manor will take time to implement between construction timelines and obtaining all the financing for Phase 1 and the ongoing phases. To combat this, the project could move in smaller incremental stages, as these funds could be utilized for some or all the infrastructure (i.e. roads, sidewalks, etc.) in Phase 1.
- b. *Infill-Development Housing Program*: The infill development portion of this proposal will be able to move forward relatively quickly as the properties are already vacant and the city owns the properties. The City will be able to issue Request for Proposals fairly quickly for the vacant properties. The length of time will only pertain the design and construction of the affordable housing units and awarded funds would be utilized for the pre-development costs to the developers.
- c. *Brownfields*: Another anticipated roadblock is brownfields. Infill housing development often comes with the risk of contamination on the land.
- d. *Overall*: This proposal requires a public-private partnership between the City and developers. While the City is offering the land at no cost to help to combat the costs associated with affordable housing development, it is well known that building materials and labor costs have increased over the past several years. As a result, ensuring developers have their funding in place and are able to bring the project to fruition, is an anticipated roadblock.

Combat Challenges

In an effort to ensure developers are able to bring projects to fruition, the City has required that developers submit their pro-formas with their applications. This ensures that only feasible projects are selected. Moreover, the City has facilitated Capacity Building Workshops, Technical Assistance Workshops, and provides support along the way to ensure developers are well versed in and prepared for working with the City.

IV. Measure of Success

- a. Mable Manor: It is anticipated that the Marble Manor site will take at least eight (8) years to be developed due to the estimated costs and the need to phase the development. There are expected to be 5 phases of completion for the entire site. The number of affordable, re-placement and market rate units is also shown below within each phase. Based on the projected timeframe of 8 years, the City of Las Vegas would view the redevelopment of Marble Manor as a success if phase 1-3 as shown in figure 1 is completed by September 30, 2029. If awarded funding, it will be utilized in phase 1 of the development.
- b. Infill Development Program: Since the City of Las Vegas will be bringing the 25 vacant lots as leverage, the city believes that developing 20 of the vacant lots by the September 30, 2029 deadline would be a measure of success. It is up to the developer to determine the design and management of units either as single-family dwelling or rental housing. Therefore the city cannot measure the exact number of units that would be produced other than a 1 for 1 ratio, although its anticipated more units may be developed. Ultimately, success is measured by adding additional affordable units to the community; helping low-income families obtain their dream of homeownership for first time homebuyers and helping to eliminate blight within the community, while furthering the community's vision of the HUNDRED Plan. The City is committed to assisting with Phase 1 and Phase 2 Environmental Site Assessment work through its US EPA Brownfields Assessment Grant.

V. Future Success

- a. Large Scale Development Project: There are multiple components to this proposal that other communities could replicate or follow when it comes to large-scale redevelopment projects like Marble Manor. The key component to this model is planning and managing expectations pertaining to timeframe. With a geographic area as large as the Historic Westside, it is important to start at the planning phase and involve the community in project discussions early and often.

This proposal demonstrates the public-private partnership and the investment between all levels of government and the Historic Westside community. Like many important factors, collaboration and communication are vitally important and making sure there are a few trusted community member to be the point of contact can help with information. It is also important to provide the community with updates either by flyers, community meetings, or emails and to designate a central location for all updates.

- b. Infill Development Program: There are many communities that have land banks that could implement an infill development program to create affordable housing or redevelop dilapidated housing for affordable housing. The scale of the program is up to the community, but it is important to develop a vision and what that will look like for the program. The key to this type of program is making sure elected officials understand the end result by informing them about the processes for redeveloping property and how redevelopment can be utilized on single sites or larger geographic areas to best benefit the community.



**LAS VEGAS
CITY COUNCIL**

CAROLYN G. GOODMAN

Mayor

BRIAN KNUDSEN

Mayor Pro Tem

CEDRIC CREAR

VICTORIA SEAMAN

OLIVIA DIAZ

FRANCIS ALLEN-PALENSKE

NANCY E. BRUNE

MIKE JANSSEN

City Manager

DEPARTMENT OF
NEIGHBORHOOD SERVICES

KATHI THOMAS

DIRECTOR

CITY HALL

495 S. MAIN ST.
LAS VEGAS, NV 89101
702.229.6011 | VOICE
711 | TTY



cityoflasvegas | lasvegasnevada.gov

October 10, 2023

Funding Title: Pathways to Removing Obstacles to Housing (PRO Housing)
Opportunity Number: FR-6700-N-98

To: United States Department of Housing and Urban Development,

The City of Las Vegas has earmarked approximately 25 City-owned vacant parcels to be donated at no/or minimal costs under the Infill Housing Development Program in the Historic Westside neighborhood for affordable housing development. The current parcels being donated are listed below:

- F Street and Van Buren Avenue; APN 139-27-110-037; 0.15 acres
- M & Madison; 2.21 acres
 - APN 139-28-303-001
 - APN 139-28-303-003
 - APN 139-28-303-004
 - APN 139-28-303-005
 - APN 139-28-303-007
- 610 W. Washington Avenue; APN 139-27-210-131; 0.16 acres
- 1012 E Street; APN 139-27-210-065; 0.11 acres
- 1014 E Street; APN 139-27-210-064; 0.05 acres
- 1016 G Street; APN 139-27-210-076; 0.16 acres
- 412 Jefferson Avenue; APN 139-27-210-057; 0.17 acres
- 410 Jefferson Avenue; APN 139-27-210-058; 0.15 acres
- 422 Jefferson Avenue; APN 139-27-210-055; 0.17 acres
- 204 Madison Ave; APN 139-27-211-012 0.15 acres
- H Street & Jackson Avenue; APN 139-27-110-069; 0.36 acres
- Van Buren & H Street; APN 139-27-110-066; 0.16 acres
- 305 Harrison Avenue; APN 139-27-111-010; 0.17 acres
- 951 E. Street APN 139-27-201-002; 0.32 acres
- 304 Madison Avenue; APN 139-27-210-055; 0.18 acres
- 210 Jackson Avenue; APN 139-27-111-045; 0.16 acres
- 713 Jefferson Avenue; APN 139-26-210-080; 0.15 acres
- 618 W. Washington Avenue; APN 139-27-210-129; 0.16 acres
- 415 W Adams Avenue; APN 139-27-210-105; 0.16 acres

This letter serves as approval and authorization to be included as leverage in the PRO-Housing Application.

Sincerely,

Kathi Thomas, Director

Cc: Arecelia Barajas, Deputy Director
Melanie Riley, Administrator



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

1 June 2022

Mrs. Elizabeth Cota
City of Las Vegas
495 S. Main St.
Las Vegas, NV 89101
ecota@lasvegasnevada.gov

RE: Availability of FY2022 U.S. Environmental Protection Agency Brownfields Funding

Dear Mrs. Cota:

Congratulations! The City of Las Vegas has been selected to receive an U.S. Environmental Protection Agency (EPA) Brownfields Assessment Grant in the amount of \$500,000. This letter lays out the programmatic and administrative materials needed to complete the application for federal assistance. This letter is not an official Notice of Award.

I will serve as the EPA Brownfields Project Officer for the city's grant and will work with you on programmatic issues, such as development of the work plan and implementation of the project once the award is made. I can be reached at 415-972-3152 or hanusiak.lisa@epa.gov.

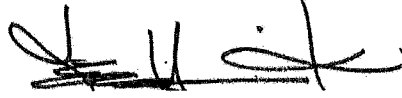
Your assigned EPA Grants Specialist, Danielle Carr, will assist with the administrative aspects of the grant, such as processing the grant award document and annual financial reporting. Danielle can be reached at 415-972-3871 or carr.danielle@epa.gov.

To complete your application, you will need to develop a project work plan and complete the forms listed below. I would like to set up a call at your earliest convenience to discuss the work plan and budget before you begin. **The work plan, budget and associated administrative documents are due to me by email (hanusiak.lisa@epa.gov) on June 22, 2022.** Once all materials are final, I will share them with Danielle, the assigned EPA Grants Specialist, to complete the grant award.

1. **Work Plan:** Use the attached template to develop a project work plan. The work plan is based on the project described in the original funding proposal.
2. **Administrative:** Complete the forms listed below. Download the forms [here](#).
 - a. Budget Information for Non-Construction Programs (SF 424A) – **Note:** *I am attaching the form submitted with the city's original application. You only need to re-submit this form if it needs corrections or changes.*
 - b. Certification Regarding Lobbying (EPA Form 6600-06)
 - c. Budget Detail (sample template is attached; refer to the R9 Grants 2022 Application Guide for budget development guidance)

We recognize this is still a challenging time for all communities. If you have questions or concerns about the required documents and due dates, please let me know, and we can adjust the schedule accordingly. Again, on behalf of the U.S. Environmental Protection Agency Brownfields Program, congratulations on Las Vegas's selection to receive a grant award. We look forward to partnering with you on this project!


Sincerely,

A handwritten signature in black ink, appearing to read 'Lisa Hanusiak', with a horizontal line drawn underneath.

Lisa Hanusiak, EPA Region 9
Brownfields Team

Attachments: Work Plan Template
Budget Detail Sample Template
EPA R9 2022 Application Guide
SF 424A Las Vegas Original Submission

cc: Danielle Carr, EPA Grants Specialist

	U.S. ENVIRONMENTAL PROTECTION AGENCY Cooperative Agreement	GRANT NUMBER (FAIN): 98T43901 MODIFICATION NUMBER: 0 PROGRAM CODE: BF	DATE OF AWARD 09/28/2022
		TYPE OF ACTION New	MAILING DATE 10/03/2022
		PAYMENT METHOD: ASAP	ACH# 90035
		Send Payment Request to: Contact EPA RTPFC at: rtpfc-grants@epa.gov	
RECIPIENT TYPE: Municipal		PAYEE: City of Las Vegas 495 S. Main St. Las Vegas, NV 89101	
RECIPIENT: City of Las Vegas 495 S. Main St. Las Vegas, NV 89101 EIN: 88-6000198			
PROJECT MANAGER Elizabeth Cota 495 S. Main St. Las Vegas, NV 89101 Email: ecota@lasvegasnevada.gov Phone: 702-229-5426	EPA PROJECT OFFICER Lisa Hanusiak 75 Hawthorne Street, LND-2-1 San Francisco, CA 94105 Email: hanusiak.lisa@epa.gov Phone: 415-972-3152	EPA GRANT SPECIALIST Danielle Carr Grants Branch, MSD-6 75 Hawthorne Street San Francisco, CA 94105 Email: carr.danielle@epa.gov Phone: 415-972-3871	
PROJECT TITLE AND DESCRIPTION BROWNSFIELD ASSESSMENT COOPERATIVE AGREEMENT See Attachment 1 for project description.			
BUDGET PERIOD 08/01/2022 - 08/31/2025	PROJECT PERIOD 08/01/2022 - 08/31/2025	TOTAL BUDGET PERIOD COST \$500,000.00	TOTAL PROJECT PERIOD COST \$500,000.00
<p align="center">NOTICE OF AWARD</p> <p>Based on your Application dated 11/29/2021 including all modifications and amendments, the United States acting by and through the US Environmental Protection Agency (EPA) hereby awards \$500,000.00. EPA agrees to cost-share 100.00% of all approved budget period costs incurred, up to and not exceeding total federal funding of \$500,000.00. Recipient's signature is not required on this agreement. The recipient demonstrates its commitment to carry out this award by either: 1) drawing down funds within 21 days after the EPA award or amendment mailing date; or 2) not filing a notice of disagreement with the award terms and conditions within 21 days after the EPA award or amendment mailing date. If the recipient disagrees with the terms and conditions specified in this award, the authorized representative of the recipient must furnish a notice of disagreement to the EPA Award Official within 21 days after the EPA award or amendment mailing date. In case of disagreement, and until the disagreement is resolved, the recipient should not draw down on the funds provided by this award/amendment, and any costs incurred by the recipient are at its own risk. This agreement is subject to applicable EPA regulatory and statutory provisions, all terms and conditions of this agreement and any attachments.</p>			
ISSUING OFFICE (GRANTS MANAGEMENT OFFICE)		AWARD APPROVAL OFFICE	
ORGANIZATION / ADDRESS U.S. EPA, Region 9, U.S. EPA, Region 9 Grants Branch, MSD-6 75 Hawthorne Street San Francisco, CA 94105		ORGANIZATION / ADDRESS U.S. EPA, Region 9, Land, Chemicals and Redevelopment Division, LND-1 R9 - Region 9 75 Hawthorne Street San Francisco, CA 94105	
THE UNITED STATES OF AMERICA BY THE U.S. ENVIRONMENTAL PROTECTION AGENCY			
Digitally signed by EPA Award Official Carolyn Truong - Grants Management Officer Angela Mendiola - Grants Management Specialist			DATE 09/28/2022

Grant Application Detailed Budget Worksheet

Detailed Description of Budget			
Analysis of Total Estimated Costs		Estimated Cost	Percent of Total
1	Personnel (Direct Labor)	0.00	0.0%
2	Fringe Benefits	0.00	0.0%
3	Travel	0.00	0.0%
4	Equipment	0.00	0.0%
5	Supplies and Materials	0.00	0.0%
6	Consultants	0.00	0.0%
7	Contracts and Sub-Grantees	0.00	0.0%
8	Construction	290,135,502.00	100.0%
9	Other Direct Costs	0.00	0.0%
10	Indirect Costs	0.00	0.0%
Total:		290,135,502.00	100.0%
Federal Share:		10,000,000	3.45%
Match (Expressed as a percentage of the Federal Share):			

8a. Administrative and legal expenses	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
10% Administrative Costs			\$1,000,000	\$1,000,000							
Subtotal - Administrative and legal expenses			\$1,000,000	\$1,000,000							
8b. Land, structures, rights-of way, appraisal, etc	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Land, structures, rights-of way, ...					Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
8c. 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 Income
Subtotal - Relocation expenses and payments					Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
8d. Architectural and engineering fees	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Developers Preconstruction Costs	25	20,000	\$500,000	\$500,000							
Infill Project											
Subtotal - Architectural and engineering fees			\$500,000	\$500,000	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
8e. Other architectural and engineering fees	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Environmental Reviews, design fees, permits	25	20,000	\$500,000	\$500,000							
Infill Project											
Subtotal - Other architectural and engineering fees			\$500,000	\$500,000	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
8f. Project inspection fees	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Project inspection fees					Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
8g. 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
Includes Demolition and Removal			\$21,394,028	\$1,000,000						\$20,394,028	
Marble Manor											
Subtotal - Site work			\$21,394,028	\$1,000,000						\$20,394,028	
8h. Demolition and removal	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Demolition and removal											
8l. Construction	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Marble Manor			\$185,598,064	\$7,000,000						\$178,598,064	
Subtotal - Construction			\$185,598,064	\$7,000,000	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
8j. Equipment	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Equipment					Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
8k. Contingencies	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Marble Manor			\$10,349,605							\$10,349,605	
Subtotal - Contingencies			\$10,349,605		Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
8l. Miscellaneous	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Soft Costs, Financing Costs, Reserves & Escrow, Developer Fee			\$70,793,805							\$70,793,805	
Marble Manor											
Subtotal - Miscellaneous			\$70,793,805							\$70,793,805	
Total Construction Costs			\$290,135,602								
9. Other Direct Costs	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Item											

Application for Federal Assistance SF-424

* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision		* If Revision, select appropriate letter(s): <div style="border: 1px solid black; height: 15px; width: 100%;"></div> * Other (Specify): <div style="border: 1px solid black; height: 15px; width: 100%;"></div>	
* 3. Date Received: <div style="border: 1px solid black; padding: 2px;">Completed by Grants.gov upon submission.</div>		4. Applicant Identifier: <div style="border: 1px solid black; height: 15px; width: 100%;"></div>			
5a. Federal Entity Identifier: <div style="border: 1px solid black; height: 15px; width: 100%;"></div>			5b. Federal Award Identifier: <div style="border: 1px solid black; height: 15px; width: 100%;"></div>		
State Use Only:					
6. Date Received by State: <div style="border: 1px solid black; width: 80px; height: 15px;"></div>		7. State Application Identifier: <div style="border: 1px solid black; width: 200px; height: 15px;"></div>			
8. APPLICANT INFORMATION:					
* a. Legal Name: <div style="border: 1px solid black; padding: 2px;">City of Las Vegas</div>					
* b. Employer/Taxpayer Identification Number (EIN/TIN): <div style="border: 1px solid black; padding: 2px;">88-6000198</div>			* c. UEI: <div style="border: 1px solid black; padding: 2px;">HJS3TZHHWJX5</div>		
d. Address:					
* Street1:		<div style="border: 1px solid black; padding: 2px;">495 South Main Street</div>			
Street2:		<div style="border: 1px solid black; height: 15px; width: 100%;"></div>			
* City:		<div style="border: 1px solid black; padding: 2px;">Las Vegas</div>			
County/Parish:		<div style="border: 1px solid black; padding: 2px;">Clark</div>			
* State:		<div style="border: 1px solid black; padding: 2px;">NV: Nevada</div>			
Province:		<div style="border: 1px solid black; height: 15px; width: 100%;"></div>			
* Country:		<div style="border: 1px solid black; padding: 2px;">USA: UNITED STATES</div>			
* Zip / Postal Code:		<div style="border: 1px solid black; padding: 2px;">891016318</div>			
e. Organizational Unit:					
Department Name: <div style="border: 1px solid black; padding: 2px;">Neighborhood Services</div>			Division Name: <div style="border: 1px solid black; padding: 2px;">Neighborhood Services</div>		
f. Name and contact information of person to be contacted on matters involving this application:					
Prefix:		* First Name: <div style="border: 1px solid black; padding: 2px;">Melanie</div>			
Middle Name:		<div style="border: 1px solid black; height: 15px; width: 100%;"></div>			
* Last Name:		<div style="border: 1px solid black; padding: 2px;">Riley</div>			
Suffix:		<div style="border: 1px solid black; height: 15px; width: 100%;"></div>			
Title: <div style="border: 1px solid black; padding: 2px;">Adminstrator</div>					
Organizational Affiliation: <div style="border: 1px solid black; padding: 2px;">City of Las Vegas</div>					
* Telephone Number: <div style="border: 1px solid black; padding: 2px;">702-229-2381</div>			Fax Number: <div style="border: 1px solid black; height: 15px; width: 100%;"></div>		
* Email: <div style="border: 1px solid black; padding: 2px;">mriley@lasvegasnevada.gov</div>					

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:

US Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.023

CFDA Title:

Community Development Block Grant- PRO Housing Competition

* 12. Funding Opportunity Number:

FR-6700-N-98

* Title:

Pathways to Removing Obstacles to Housing (PRO Housing)

13. Competition Identification Number:

FR-6700-N-98

Title:

Pathways to Removing Obstacles to Housing (PRO Housing)

14. Areas Affected by Project (Cities, Counties, States, etc.):

Ward Map.docx

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

Activities that take steps to remove barriers to affordable housing and seek to increase housing production and lower housing costs.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="10,000,000.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="10,000,000.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title: * Telephone Number: Fax Number: * Email: * Signature of Authorized Representative: * Date Signed:

The following attachment is not included in the view since it is not a read-only PDF file.

Upon submission, this file will be transmitted to the Grantor without any data loss.

Ward Map.docx

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:

HJS3TZHHWJX5

* Report Type:

INITIAL

1. Applicant/Recipient Name, Address, and Phone (Include area code):

* Applicant Name: City of Las Vegas

* Street1: 495 South Main Street

Street2:

* City: Las Vegas

County: Clark

* State: NV: Nevada

* Zip Code: 891016318

* Country: USA: UNITED STATES

* Phone: 702-229-2381

2. Employer ID Number (do not include individual social security numbers):

88-6000198

* 3. HUD Program Name:

Community Development Block Grant- PRO Housing Competition

* 4. Amount of HUD Assistance Requested/Received: \$

10,000,000.00

5. State the name and location (street address, City and State) of the project or activity:

* Project Name: City of Las Vegas PRO Housing Program

* Street1: 495 South Main Street

Street2:

* City: Las Vegas

County: Clark

* State: NV: Nevada

* Zip Code: 891016318

* Country: USA: UNITED STATES

Part I Threshold Determinations

* 1. Are you applying for assistance for a specific project or activity? These terms do not include formula grants, such as public housing operating subsidy or CDBG block grants. For further information see 24 CFR Sec. 4.3.

☐ Yes

☒ No

* 2. Have you received or do you expect to receive assistance within the jurisdiction of the Department (HUD), involving the project or activity in this application, in excess of \$200,000 during this fiscal year (Oct. 1-Sep. 30)? For further information, see 24 CFR 4.9.

☐ Yes

☒ No

If you answered "No" to either question 1 or 2, **Stop!** You do not need to complete the remainder of this form. However, you must sign the certification at the end of the report.

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:

1. All developers, contractors, or consultants involved in the application for assistance or in the planning, development, or implementation of the project or activity.

* 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 Participation in Project/Activity

* Financial Interest in Project/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).

* Alphabetical list of all persons with a reportable financial interest in the project or activity (For individuals, give the last name first)

City of Residence

* Type of Participation in Project/Activity

* Financial Interest in Project/Activity (\$ and %)

			\$		%
			\$		%
			\$		%
			\$		%
			\$		%

Note: Use additional pages if necessary.

Add Attachment

Delete Attachment

View Attachment

Certification

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

Warning: If you knowingly make a false statement on this form, you may be subject to criminal and/or civil penalties under Section 1001 of Title 18 of the United States Code. In addition, any person who knowingly and materially violates any required disclosures of information, including intentional non-disclosure, is subject to civil money penalty not to exceed \$10,000 for each violation.

* Signature:

* Date: (mm/dd/yyyy)

Completed Upon Submission to Grants.gov

Completed Upon Submission
to Grants.gov

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 required 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 zip 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:

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 calculated.

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.

**Applicant and Recipient
Assurances and Certifications**

**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 Representative Name:

Prefix: *First Name:
Middle Name:
*Last Name:
Suffix:

*Title:

*Applicant Organization:

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).

3. 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.

8. That no Federal appropriated 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 Federally-recognized 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).

*Signature:

Completed Upon Submission to Grants.gov

*Date:

Completed Upon Submission to
Grants.gov

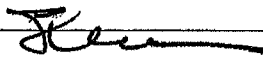
DISCLOSURE OF LOBBYING ACTIVITIES

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: <input type="checkbox"/> a. contract <input checked="" type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	2. * Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input checked="" type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	3. * Report Type: <input checked="" type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change
4. Name and Address of Reporting Entity: <input checked="" type="checkbox"/> Prime <input type="checkbox"/> SubAwardee * Name: City of Las Vegas * Street 1: 495 South Main Street Street 2: * City: Las Vegas State: NV: Nevada Zip: 891016318 Congressional District, if known: 1 & 2		
5. If Reporting Entity in No.4 is Subawardee, Enter Name and Address of Prime: 		
6. * Federal Department/Agency: Housing and Urban Development	7. * Federal Program Name/Description: Community Development Block Grant- PRO Housing Competition CFDA Number, if applicable: 14.023	
8. Federal Action Number, if known: 	9. Award Amount, if known: \$ 	
10. a. Name and Address of Lobbying Registrant: Prefix * First Name N/A Middle Name * Last Name N/A Suffix * Street 1 N/A Street 2 * City N/A State Zip		
b. Individual Performing Services (including address if different from No. 10a) Prefix * First Name N/A Middle Name * Last Name N/A Suffix * Street 1 N/A Street 2 * City N/A State Zip		
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when the transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be reported to the Congress semi-annually and will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure. * Signature: Completed on submission to Grants.gov * Name: Prefix * First Name Kathi Middle Name * Last Name Thomas Suffix Title: Neighborhood Services Director Telephone No.: 702-229-1836 Date: Completed on submission to Grants.gov		
Federal Use Only:		Authorized for Local Reproduction Standard Form - LLL (Rev. 7-97)

Code of Ethics Policy/Procedure

No:	CM115	Type:	Citywide Policy/Procedure
Department:	City Manager's Office		
Original Effective Date:	10/11/2012	Approval Signature:	
Revision Date:	7/3/2018	Expiration Date:	7/3/2023

Purpose

To establish a Code of Ethics that promotes faith in the integrity, impartiality and transparency of city employees by maintaining an ethical organization built on the highest standards of public service.

Scope

All employees and elected officials. The term "elected officials" does not include municipal judges since they are instead subject to the Nevada Code of Judicial Conduct.

Definitions

Term	Definition
Public Officer	Per NRS 281A.160 and NRS 281.005, for purposes of this policy, "Public Officer" has been interpreted to include the following: <ul style="list-style-type: none">• City Manager• City Attorney• City Auditor• Mayor• City Council Members
Public Employee	Any person who performs public duties under the direction and control of a public officer for compensation paid by the State or any county, city or other political subdivision, or who otherwise qualifies under NRS 281A.150.
Employee	The term "employee" refers to both public officers and public employees unless otherwise stated.

Policy

A. Statement of Principle

1. The city of Las Vegas Code of Ethics bases acceptable behavior for all city employees on our city values (currently Kind, Committed, and Smart)
2. The Code of Ethics is designed to further underscore the importance of our values by highlighting moral principles and commitments that shall guide city employees in their public service.
3. The Code of Ethics reinforces what the city of Las Vegas represents, the expectation that the city has for all of its employees, and what to expect when doing business with the city.

4. This Code of Ethics shall serve as a reference guide and supplement State law set forth in NRS Chapter 281A – Ethics in Government, the guidelines set forth in the Nevada Commission on Ethics' Ethics in Government Manual for Nevada Public Officers and Public Employees (Attachment A), and municipal ordinances and policies within which employees must operate and conduct themselves.

**The Manual will serve as a guide. For the most recent legislative changes, refer to Legislative News on the Nevada Commission on Ethics' website.*

B. General Standards

1. Employees will carry out their responsibilities in a manner to bring respect to their profession, their department and to the city.
2. Employees will always conduct themselves in a way that reflects positively on themselves and the organization.
3. Employees will be dedicated to the highest levels of honor and integrity in order to merit the respect and confidence of the public.
4. Employees shall adhere to the Fraud Policy/ Procedure (CM105).
5. Employees will maintain a sense of social responsibility as trusted public servants.
6. Employees will work to reach the ideal that the function of local government is to serve the best interests of all people.
7. Employees will continuously seek to improve the quality and image of public service.
8. Employees shall maintain in confidence the affairs of any client, colleague or organization, and shall not disclose confidential information obtained in the course of professional activities.
9. Employees will treat all citizens with impartiality, fairness and equity.
10. Employees will provide courteous and excellent customer service.
11. Employees will serve the public in a way that promotes public confidence and builds community to make life better.

C. Conflicts of Interest

1. As set forth in NRS 281A.420, all public officers and employees must publicly disclose conflicts of interest that arise due to matters involving:
 - a. A person with whom the public officer or employee entered into a loan either as a borrower or a lender;
 - b. A person from whom the public officer or employee received a gift;
 - c. Persons, entities, or issues with which the public officer or employee has a significant financial interest;
 - d. Persons to whom the public officer or employee has a commitment in a private capacity, as defined in NRS 281A.065; and
 - e. The nature of any representation or counseling that the public officer or employee provided to a private person for compensation before another agency within the immediately preceding year, provided such representation or counseling is permitted by NRS 281A.410.
2. The provisions of subsection 1 do not require a public officer to disclose:

- a. Any campaign contributions that the public officer reported in a timely manner pursuant to NRS 294A.120 or 294A.125; or
- b. Any contributions to a legal defense fund that the public officer reported in a timely manner pursuant to NRS 294A.286.
- 3. A public officer or employee is prohibited to act on an item (including approving, disapproving, voting, abstaining from voting, etc.) until public disclosure of a conflict of interest is made.
- 4. In addition to disclosure, a public officer or employee must abstain from voting on or advocating the passage or failure of a matter with respect to which the independence of judgment of a reasonable person in the public officer's situation would be materially affected by:
 - a. The public officer's acceptance of a gift or loan;
 - b. The public officer's significant financial interest;
 - c. Any person to whom the public officer has a commitment in a private capacity; or
 - d. A private person who was represented or counseled by the public officer or employee.

For additional information regarding disclosure and abstention, see the Ethics in Government Manual for Nevada Public Officers and Public Employees by the Nevada Commission on Ethics.

D. Prohibited Conduct

- 1. Employees will not use their positions or city resources for personal gain.
- 2. Gifts
 - a. Employees should not accept any gifts or favors that have a cumulative value of over \$200 in any given calendar year.
 - b. Employees who work in the Purchasing & Contracts Division of the Finance Department are required to follow a higher standard laid out in the Purchasing & Contracts Division Ethics Policy FNPC1. Purchasing employees may not seek or accept any gift, service, favor, gain, or economic opportunity in the performance of the duties of work in the Purchasing & Contracts Division.
 - c. If a public officer receives any gifts or favors with an aggregate value of over \$200 in any given calendar year, he/she must complete a financial disclosure statement that lists all such gifts and favors, including the identity of the donor and value of each gift, per NRS 281.571.
 - d. Gifts to a department as a whole may be accepted, but must be made available to all employees of the department (e.g. holiday gift baskets should be left in a break room or other common area).
 - e. No gifts should be accepted by a public officer or public employee, regardless of the value, if they influence or affect the recipient's duty to serve the taxpayers.
 - f. Exceptions to this code:
 - i. A gift received from a person who is related to the receiving employee within the third degree of consanguinity or affinity; and
 - ii. Ceremonial gifts received for a birthday, wedding, anniversary or other ceremonial occasion, if the donor does not have a substantial interest in the

- legislative, administrative or political actions in city operations, and such gift(s) will not compromise the employee's ability to perform objective public service.
3. Employees should use city resources for city business purposes only.
 4. Employees will not use or attempt to use their city position to obtain special privileges for themselves or others.
 5. Employees will not endorse private companies.
 6. Employees should not engage in outside political or other activities that compromise their ability to perform objective public service. Employees shall adhere to the Las Vegas Municipal Code Section 2.51.020 - Public Official Activities (Attachment B) when engaging in activities related to a municipal, county, state, or national election. Employees shall also adhere to the Running for Political Office and/or Serving as an Elected Official Policy/Procedure (CM109).
 7. Employees are responsible for reviewing and complying with the items listed in the "Prohibited Conduct" section of the Ethics in Government Manual for Nevada Public Officers and Public Employees by the Nevada Commission on Ethics (Attachment A).

Procedure

A. Disclosing a Conflict of Interest

1. In the event a member of the City Council has a conflict of interest, he/she must disclose the conflict verbally on the record at the time the matter is being considered, pursuant to NRS 281A.420.
2. In the event an appointed public officer or public employee has a conflict of interest, he/she must make the disclosure to his/her supervisor or appointing authority.
3. Any officer or employee whose duties require participation in the formulation of, or to approve plans or policies for the redevelopment of a redevelopment area who owns, purchases, or has or acquires any direct or indirect financial interest in such property, shall immediately make a written disclosure of it to the Office of the City Clerk and the City Council, which must be entered on their minutes, pursuant to NRS 279.454.

B. Filing a Financial Disclosure Statement

1. Public officers will follow state law related to financial disclosure statements (NRS 281.5584 – 281.581).
2. The City Clerk will provide the Nevada Secretary of State a list of each public officer who is required to file a financial disclosure statement on or before December 1 of each year, pursuant to NRS 281.574.
3. Public officers who are required to file a financial disclosure statement must do so with the Secretary of State through their online system, Aurora, no later than January 15 of each year of their term including the year the public officer leaves office, and the following year unless the public officer leaves office before January 15 in the prior year, pursuant to NRS 281.559.
4. Financial disclosure statements provided to the Secretary of State shall contain information on sources of income, real property, creditors, meetings/events/trips, gifts and business entities.

5. The State of Nevada Financial Disclosure Statement Guide provided by the Secretary of State may be used to help prepare and file the required statements.

C. Acknowledgment of Statutory Ethical Standards

1. Elected Public Officers: In accordance with NRS 281A.500, the City Clerk will notify elected public officers of the statutory ethical standards and the duty to file an acknowledgment of the statutory ethical standards on or before the date the elected public officer swears or affirms the oath of office.
 - a. The acknowledgment must be executed on a form prescribed by the Nevada Commission on Ethics and filed with the Commission on or before January 15 following the general election, or if elected in an election other than a general election, on or before the 30th day following the date on which the elected public officer swears or affirms the oath of office.
 - b. The acknowledgment will be executed and filed once for each term of office for elected public officers.
 - c. This acknowledgment will be included in the Newly Elected Official Guide provided to new councilpersons by the Clerk's office. The City Clerk will ensure the execution of the form and deliver the acknowledgment to the Commission in accordance with NRS 281A.500(6).
 - d. At the time the elected public officer is provided with a copy of the acknowledgment, he/she will be provided with a printed copy of the statutory ethical standards, pursuant to NRS 281A.500(8).
 - e. The Clerk's office will scan the executed acknowledgement, file it with the Nevada Commission on Ethics, and retain a copy for their records.
2. Appointed Public Officers: In accordance with NRS 281A.500, the City Clerk will notify appointed public officers of the statutory ethical standards and the duty to file an acknowledgment of the statutory ethical standards on or before the date the appointed public officer swears or affirms the oath of office.
 - a. The acknowledgment must be executed on a form prescribed by the Nevada Commission on Ethics and filed with the Commission on or before on or before the 30th day following the date on which the appointed public officer swears or affirms the oath of office.
 - b. After the initial filing, the acknowledgment will be executed and filed with the Commission on or before January 15 of each even-numbered year while the public officer holds that office.
 - c. At the time the appointed public officer is provided with a copy of the acknowledgment, he/she will provided with a printed copy of the statutory ethical standards, pursuant to NRS 281A.500(8).
 - d. The Clerk's office will scan the executed acknowledgement, file it with the Nevada Commission on Ethics, and retain a copy for their records.
3. Public Employees: During new employee onboarding, the Department of Human Resources will provide each new employee with a hyperlink to access the Ethics in Government Manual for Nevada Public Officers and Public Employees. This serves to

satisfy NRS 281A.500(2) which requires the city to provide each new public employee with the information prepared by the state Ethics Commission concerning the statutory ethical standards.

References

CM 109 Running for Political Office and/or Serving as an Elected Official Policy/Procedure

CM 105 Fraud Policy/Procedure

FNPC1 Purchasing & Contracts Division Ethics Policy

NRS 281A – Ethics in Government

NRS 281 – Public Officers and Employees

NRS 279.454 - Interest in property included in redevelopment area forbidden; disclosure of interest; exception

Nevada Acknowledgment of Ethical Standards for Public Officers -

<http://ethics.nv.gov/uploadedFiles/ethicsnvgov/content/Forms/Acknowledgement%20form%20as%20amended%20by%20SB%2084.pdf>

NV Secretary of State Financial Disclosure Statement Guide -

<https://nvsos.gov/sos/home/showdocument?id=4010>

Nevada Secretary of State: Aurora individual search -

https://nvsos.gov/SoSCandidateServices/AnonymousAccess/CEFDSearchUU/Search.aspx#individual_search

Nevada Secretary of State: Aurora file a report -

<https://nvsos.gov/SOSCandidateServices/loginuu.aspx?timeout=true&ReturnUrl=%2fSOSCandidateServices%2fMyFilingsuu.aspx>

Attachments

A. Ethics in Government Manual for Nevada Public Officers and Public Employees: NRS 281A

B. Las Vegas Municipal Code Section 2.51.020 - Public Official Activities (excerpt)