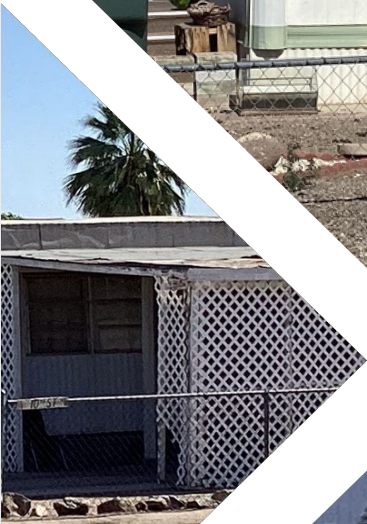




CITY OF  
*Yuma*

**PRESERVATION AND  
REINVESTMENT INITIATIVE  
FOR COMMUNITY ENHANCEMENT  
(PRICE)  
PROJECT PROPOSAL  
2024**



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**Exhibit A: Executive Summary  
City of Yuma**

The City of Yuma is pleased to submit a proposal for the Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Competition. The PRICE program strives to meet the following goals: increase housing supply and affordability for low-income persons; preserve and revitalize existing manufactured housing and manufactured housing communities (MHC); promote homeownership opportunities and advance resident-controlled sustainable communities through new and revitalized manufactured housing units that will remain affordable long term; and support accessibility modifications, repairs and replacement for persons with disabilities, facilitate aging in place for older adults and increase access to affordable housing for low-income households (LMI). The City has identified a critical area of need that will be addressed by this Manufactured Housing Rehabilitation Project proposal.

Yuma is a unique community situated near the international border with Mexico and the state border with California. The city has a diverse population of nearly 100,000 people and, like the rest of the country, is experiencing a major shortage of affordable housing. Yuma's population increases by approximately 90,000 people from October through April. The pleasant weather attracts senior visitors from regions such as Oregon, Washington, the Midwest, and Canada, where winters are harsh. It also draws many farmworkers who come to work for agricultural companies. During the winter, Yuma is known as the lettuce capital of the world due to its ideal climate for growing green leafy vegetables. Federal regulations mandate that companies provide H-2A housing, ensuring that migrant farmworkers have no issues finding accommodations. Farming companies have addressed this by purchasing existing housing, developing new units, and converting older motels to house workers. This has contributed to the affordable housing shortage for year-round residents.

The City's Neighborhood Services Division has a long history of addressing the needs of low-income persons and neighborhoods with Community Development Block Grant (CDBG), and Home Investment Partnerships funding (HOME) among other sources. The successful implementation of two Neighborhood Revitalization Strategy Area (NRSA) plans in the Carver Park Neighborhood NRSA (2000-2007) and the Mesa Heights Neighborhood NRSA (2016 - 2023). Both have substantially impacted the conditions and quality of life in these two LMI areas. In addition, the City has administered an Owner-occupied Housing Rehabilitation program since 1997. Although the City has completed many single-family reconstruction projects and hundreds of home rehabilitation projects, there is much more work to be done. With the rise in construction costs, current HUD funding does not stretch very far. Our Housing Rehab program currently has 80 families on the waiting list, but only enough funding to complete around six projects per year.

City staff conducted a citywide windshield survey (detailed in the Needs Section) and created an inventory that includes a broad assessment of conditions of all manufactured homes, mobile homes, park models, and recreational vehicles. Data from the survey is provided throughout this proposal.

Our proposed project will help meet the following PRICE goals:

- Preserve and revitalize existing manufactured housing and manufactured housing communities.
- Increase resilience to extreme weather, natural hazards, and disaster events, support energy efficiency, and protect the health and safety of manufactured housing residents.
- Support accessibility modifications, repairs, and replacement of deteriorating manufactured housing units – especially to increase accessibility and access for persons with disabilities, facilitate aging in place for older adults, and increase access to affordable housing for low-income households.

In addition to these goals, we identify the actions to be taken to achieve the goal of Affirmatively Further Fair Housing (AFFH). The elements of our proposal are parallel to the ongoing mission and practice of our division which has a long-standing commitment to the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment.

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**Exhibit B: Threshold and Other Submission Requirements**

**City of Yuma**

### Threshold Requirements

1. Resolution of Civil Rights Matters: The City of Yuma has no outstanding charges, cause determinations, lawsuits, or letters of findings for civil rights matters as referenced in Section III. D subparagraphs 1 – 5 of the NOFO.
2. Timely Submissions of Applications: The City of Yuma will submit the application by the deadline listed in the NOFO.
3. Eligible Applicant: The City of Yuma meets all the eligibility requirements outlined in the NOFO. Per Section III. A, the City is a 02-City Government.
4. Number of Applications: The City of Yuma is submitting one application and has a valid Unique Entity Identifier in sam.gov.

### Other Submission Requirements

In the following exhibits and attachments, the City addressed all Other Submission Requirements referenced in Section IV.G.

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**Exhibit C: Need  
City of Yuma**



### *Factor (a): Need*

#### **What is your project area and the need for affordable accessible housing within it?**

Two of the major economic drivers of the local economy are military bases/testing sites and agriculture. Agriculture has an adequate supply of housing, however, there is a shortage of housing that is affordable based on the Basic Allowance for Housing (BAH) for military personnel. The rest of the local population, especially low-income families and individuals have difficulty finding affordable housing based on their income. The gap between the need and supply of affordable housing only continues to grow, while the effect of recent inflation is also a contributing factor in the affordable housing crisis.

Public housing and housing choice vouchers (HCV) have three-year waiting lists for applicants. Families that get approved for vouchers, find it extremely difficult to locate safe, decent, and sanitary housing that meets the allowable rent per the HCV guidelines. Therefore, the need to preserve, rehabilitate, and/or replace existing aging manufactured housing stock is crucial to narrowing the affordable housing gap. Although we are encouraged by recent awards of low-income housing tax credit projects in Yuma, it is not enough. An investment in the preservation of manufactured housing stock would be a valuable contribution to help mitigate the affordable housing crisis.

To get a close-up evaluation of the conditions of manufactured home/mobile homes, park models, and recreation vehicles (RV), City staff undertook a windshield survey to obtain real-world data. Two-person teams were deployed to different sections of the visiting trailer parks, manufactured home communities (MHC), manufactured housing subdivisions (MHSs), and individually parceled properties to identify the types of units and existing conditions relative to the need for repairs. In addition, staff searched Yuma County assessor's records to determine the age of manufactured homes located on parceled property.

The results from the windshield survey were predictable for the trailer parks and MHCs that were presumed to be occupied by non-low-income households. Even though some of these areas had many units that were over 40 years old, the need for repairs was not obvious in the windshield survey. However, the windshield survey was a quick look at the exterior of each home, so interior repairs or modifications may still be needed. Staff observed that a large number of manufactured homes are occupied by elderly persons, and many have unsafe wheelchair ramps. It can be assumed that there is also a need for other types of handicapped modifications inside the homes.

Not surprisingly, units located in low-income areas with the same housing types and year of manufacture revealed an obvious need for repairs and replacement. This is a result of deferred maintenance caused by limited financial resources. Before detailing our intended focus for our PRICE proposal, we would like to give a broad overview of the manufactured housing conditions in Yuma.

The windshield survey counted 9,851 total units of all types with 4.8% (475) in need of minor repairs, 8.4% (828) in need of moderate repairs, and 10.4% (1,024) in need of major repairs or replacement. The survey was conducted in April which may have resulted in a lower count of RVs observed. As many as 20,000-30,000 winter visitors depart annually by the end of March (the rest in April). Since the focus of our grant proposal is to preserve manufactured homes for permanent residents, this should not be a significant factor in an analysis of the need. The windshield survey breakdown by unit type is as follows:

Type	Need for Repairs		
	Minor	Moderate	Major/ Replacement
<b>Manufactured/Mobile Homes (3,716)</b>	211 (5.4%)	336 (9%)	529 (14.2%)
<b>Park Models (3,863)</b>	119 (3.1%)	179 (4.6%)	63 (1.6%)
<b>Recreational Vehicles (being used as permanent housing) (2,272)</b>	145 (6.4%)	313 (13.8%)	432 (19%)

To put these overall statistics into perspective, it is necessary to give an overview of the types of MHCs, MHSs, and trailer parks that were surveyed. The sizes of the identified areas range from 25-unit subdivisions/trailer parks to a 1,200-space winter visitor park composed of park models and RV's. The average size of the trailer/MHC's in Yuma is approximately 300 units. The survey also found MHCs and subdivisions consisting completely of manufactured homes while other trailer parks and manufactured home parks contained every housing type noted in the survey. The survey found a trend of a higher percentage of repairs needed in single property owner MHCs (excluding 55+ and winter visitor MHCs) and trailer parks than those on parceled properties where the manufactured homes and homesite property are owned.

The survey found that under the recreation vehicle category (RV's) 60-70% were fifth-wheel trailers being used as permanent housing. Many have been in the same space for 5-25 years. Some single-property owner trailer parks contain manufactured/mobile homes that are owner-occupied, the majority are rentals. Our exposure to the conditions of the trailer parks and rental MHCs was very helpful, as we are in partnership with other agencies and resources that would be able to address some aspects of the deficiencies. However, the capacity and experience of our division are uniquely suited to the repair and replacement of owner-occupied manufactured homes with the goal of preserving affordable housing stock.

In our grant proposal, we have identified the need for repair and replacement of manufactured homes on homeowner-owned property in MHCs, MHSs, and individual lots. Below is an overview of the evaluation of these properties:

<b>Manufactured Homes on Individually Owned Parcels: 1,931</b>	
<b>Need for repairs</b>	<b>Number of Units</b>
Minor	79
Moderate	94
Major	159

<b>Age of Homes</b>	
Manufactured Pre-1976	598
1976 – 1984	392
1984 – 2023	941

It is interesting to note that although the survey shows that 159 units appear to need major repairs, the County Assessor’s records show nearly 600 units manufactured prior to 1976. As stated previously, the windshield survey was a quick look at the exterior of each home, so repair assistance may still be needed. In the survey, a number of MHCs with manufactured homes appeared to be in good condition and we do not expect to have many participate in our proposed program. However, another group of MHCs with a much higher incidence of deferred maintenance resulted in a higher percentage in need of repairs. There is a presumption that a sizeable percentage of these units are owned by low-income families or individuals who lack resources to replace their aging manufactured homes.

Without a substantial investment of resources to implement a program that addresses necessary repairs or replacement of this affordable housing stock, there will be continued deterioration reducing the number of available units in the coming years. In addition, the existing health and safety issues caused by substandard housing and/or dated manufactured homes will continue to impact low-income families negatively.

Based on our windshield survey, the following results were obtained that identify the following MHCs as examples of “high need” areas for a repair/replacement program:

<b>Manufactured Home Community</b>	<b>Minor</b>	<b>Moderate</b>	<b>Major</b>	<b>Pre-1976</b>	<b>Total Units</b>
<b>Del Oro Estates</b>	25	24	49	66	270
<b>La Mesa Mobile Home Subdivision</b>	5	2	27	18	47
<b>Magnolia Village MHC</b>	32	49	36	141	286

The proposed program will be modeled after the City of Yuma’s Owner-Occupied Housing Rehabilitation Program. The City has administered this program for over 30 years. By utilizing the existing deferred loan program policy, substantial rehabilitation will have a 15-year affordability period. A manufactured home replacement would be a 20-year affordability period.

The multi-year structure of a PRICE grant will allow adequate time for outreach to the community, to qualify applicants, and to schedule repairs or replacements within the period required by the NOFO.

**Is your project within or does it include any communities that meet Distress Criteria?**

A search of 2022 U.S Census Bureau QuickFacts data shows that Yuma is a community that meets the Distress Criteria for low income as defined in 12 CFR 1805.201(b)(3)(ii)(D): Yuma area median household income (\$59,312) is less than 80% of the national median household income of \$75,149. Yuma also meets the Distress Criteria for high unemployment defined as an unemployment rate is at least 1.5 times the national average. The Department of Labor Statistics for March 2024 shows the national unemployment rate as 3.9% and Yuma has an 8.1 % rate, which is over 2.0 times the national figure. There is a connection between high unemployment and low household income that creates a financial situation that makes maintaining a manufactured home unattainable for many families.

**Does your proposal increase resilience in any disaster-prone areas?**

The FEMA Community Disaster Resilience Zone website showed no census tracts identified as Community Disaster Resilience Zones in the Yuma area. Per the website data, the nearest zone is in La Paz County over 100 miles north of Yuma. Therefore, our program does not address increased resilience regarding that criterion. The proposed program will comply the updated HUD FFRMS floodplain requirements and emphasize energy efficiency and weatherization in replacement and rehabilitation of manufactured homes. The Manufactured Housing Rehabilitation Project will address health and safety issues associated with outdated manufactured homes which could include mold, asbestos, radon, and other health-threatening conditions.

**What are the barriers to manufactured housing preservation or revitalization in your project area?**

The Yuma community faces several significant housing challenges that impact both availability and affordability, affecting residents' overall quality of life. These multifaceted challenges include financial constraints, informational gaps, cultural and linguistic differences, and accessibility issues. Addressing these unique barriers is essential to improving housing conditions and meeting the diverse needs of Yuma's population.

Financial Barriers:

The rising costs of construction materials necessary for repairing and/or remodeling manufactured homes is a significant barrier. From the Improving America’s Housing 2023 Report (Harvard Study): “Simultaneously, the pandemic saw prices of many key building materials rise dramatically: 20–25 percent for cement, brick and clay tile, flat glass, and lumber and plywood; 34 percent for insulation materials; 42 percent for gypsum products; 54 percent for plastic construction materials; and a stunning 67 percent for steel mill products.” Given that

prices have only continued to increase since the time of the study (December 2022) it is our observation that much needed maintenance and preservation of manufactured homes has been delayed or abandoned due this overwhelming economic factor.

Alongside of the barrier of rising costs for home improvements is the barrier created by the continued rise in house prices and was followed by a rise in interest rates for new mortgages. Although the most dramatic increases may have been in stick-built homes, it is evident that every type of housing stock, including manufactured homes was similarly affected.

Limited Access to Information:

Limited access to information about available housing options, tenant rights, and fair housing laws can be a barrier. Some individuals may not know their rights or how to navigate the housing market. The City will continue to partner with Southwest Fair Housing Council to educate the community on fair housing rights.

Language and Cultural Barriers:

Language differences and cultural norms can create challenges for individuals seeking housing. Limited English language proficiency may hinder communication with landlords and real estate agents.

Disability-Related Barriers:

Non-accessible housing design, lack of reasonable accommodations and discriminatory practices can create barriers for people with disabilities.

Other Barriers:

The assessment of existing barriers did not identify any existing pattern of segregation. Although the 55+ and winter visitor MHCs do not typically have a diverse population, it is a result of economic factors that are not associated with purposeful discrimination. The MHCs and individual properties assessed as the highest need to be addressed by our proposed program appear to have diversity on a level of the local population. The infusion of replacement and repaired units as a cause of the Manufactured Housing Rehabilitation program will positively impact the quality of life in these communities.

The successful implementation of the proposed project would preserve a significant amount of affordable housing and increase the quality life of numerous households. In addition, the proven history of private investment that usually follows public investment is anticipated to add to the preservation efforts made by the proposed program.

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**Exhibit D: Soundness of Approach  
City of Yuma**

## ***Factor (b): Soundness of Approach***

### ***Subfactor (b)(i): Project Description, Management, and Impact***

#### **What are your vision and goals?**

The Manufactured Housing Rehabilitation Project focuses on addressing critical housing needs in our community through the rehabilitation of existing owner-occupied manufactured housing units and the replacement of blighted units manufactured prior to 1976. Our primary goal is to preserve and improve the condition of existing owner-occupied manufactured housing by addressing issues such as structural deficiencies, and health and safety hazards. Additionally, we seek to replace blighted pre-1976 units with modern, compliant homes, enhancing the overall quality and sustainability of Yuma's housing stock. By targeting households with low to moderate incomes, our project meets the CDBG "Benefiting Low- to Moderate-Income Persons" (LMI) national objective, ensuring that these households have access to safe, decent, and affordable housing options.

Manufactured housing represents a significant portion of our community's housing stock and provides affordable housing options for many residents. However, a substantial number of these units are in dire need of rehabilitation due to structural inadequacies, and risks to health and safety. City of Yuma staff undertook a windshield survey to broadly evaluate the condition, age, and type of housing stock in each community. The assessment involved an examination of various factors, including the number of manufactured housing units, the condition of each unit, and the presence of blighted pre-1976 units. The assessment process included utilizing GIS systems to identify Manufactured Home Communities (MHCs), the Yuma County Assessor records to identify owner-occupied units and lots, on-the-ground surveys, data analysis, and consultations with local stakeholders.

Staff systematically evaluated the condition of the housing stock to identify areas with deteriorating or substandard housing conditions. By assessing factors such as structural integrity, maintenance levels, and compliance with safety standards, we gained insights into the urgent housing needs within each community.

Additionally, we considered the age of the housing stock to understand the potential need for upgrades and modernization. By analyzing the age distribution of housing units, we could prioritize interventions in communities where older housing stock may require more extensive repairs or replacements.

Lastly, we identified blighted units manufactured prior to 1976 as a priority for replacement efforts due to their significant health and safety risks. By pinpointing communities with a high concentration of blighted units, we can allocate resources effectively to address these pressing housing challenges.

The owner of a proposed project site will own the manufactured home and the parcel where the

rehabilitated or replaced unit will be situated. The owner will collaborate with City staff to provide the necessary documentation to determine their eligibility and adhere to project requirements.

**Which eligible activities will you use to address the need(s) described in Factor (a)?**

The City of Yuma will focus on Manufactured home rehabilitation and replacement. Rehabilitation efforts will focus on repairing and upgrading individual housing units to address identified deficiencies including ADA accessibility, structural repairs, roof replacements, insulation upgrades, plumbing and electrical improvements, and the installation of safety features such as smoke detectors and carbon monoxide detectors. However, if a unit is deemed beyond repair, or if the cost of rehabilitation is deemed impractical, the manufactured home will be replaced. These activities directly address the existing need for safe, decent, and affordable housing by improving the quality and safety of existing housing stock.

In addition to rehabilitation, a replacement program for blighted pre-1976 units will be implemented. By replacing these units with modern, compliant homes, we ensure that residents have sustained access to safe and durable housing options that meet current building codes and standards. This approach provides a long-term solution to the need for quality housing, ensuring that residents are not left without stable housing options.

Although participation in the Manufactured Housing Rehabilitation Project is voluntary, we will ensure housing stability for temporarily displaced residents. To this end, the City will provide temporary relocation assistance and ongoing support services during and following the project completion. This assistance will include securing temporary alternative housing, as well as facilitating access to storage units for personal belongings while the home is being replaced or rehabilitated. Additionally, we will ensure access to essential social services to address any additional needs that may arise. To promote long term stability, the City will provide homeowner counseling, maintenance counseling resources on home maintenance and financial literacy education.

While our proposal does not include specific housing reservations for households assisted under other HUD affordable housing programs, such as Housing Choice Voucher (HCV) recipients or the Indian Housing Block Grant (IHBG), we remain committed to serving the needs of low- to moderate-income households and communities. Our approach is designed to ensure that all residents, regardless of housing assistance status, have access to safe, decent, and affordable housing options.

**What is your timeline and key tasks along that timeline?**

1. Project Planning and Preparation (Month 1-3):
  - Develop marketing materials and outreach strategies.
  - Finalize application forms and eligibility criteria.



- Begin outreach efforts to inform eligible homeowners (social media, newspaper, door-to-door flyers).
2. Application Submission and Review (Month 4-24):
    - Launch the application process and begin accepting applications.
    - Review applications as they are received.
    - Collect income documentation and make eligibility determinations.
    - Establish a waitlist based on the order of when applications are received.
  3. Construction and Rehabilitation (Month 8-48):
    - Pre-construction planning – engineering, site plans and procurement process
    - Assist program participants with finding and setting up temporary housing.
    - Proceed with construction and rehabilitation activities for approved homeowners.
    - Provide ongoing support services to temporarily displaced residents.
    - Communicate regularly with homeowners on the waitlist.
  4. Completion and Project Closeout (Month 48-60):
    - Complete construction and rehabilitation or replacement activities.
    - Conduct final inspections and ensure compliance.
    - Prepare final project reports and documentation.
  5. Post-Project Monitoring and Evaluation (Ongoing):
    - Monitor the performance and impact of rehabilitated housing units.
    - Solicit feedback from homeowners and stakeholders.
    - Conduct annual loan servicing to ensure ongoing compliance with project guidelines.

Our aim is to complete eleven replacements and five rehabilitation projects annually, allowing these projects to overlap at different stages of the project life cycle. After completing one site, we'll move to the next on our waitlist, ensuring our efforts have a widespread impact and offer timely assistance to households in need. Throughout this process, ongoing communication and collaboration with homeowners is essential to facilitate smooth project implementation and

achieve the goals of preserving and improving the condition of existing manufactured housing for low-to-moderate-income households.

**What is your budget?**

We are estimating that at least 220 owner-occupied manufactured homes are in need of repair or replacement and approximately 50% of them have low-moderate incomes. We estimate assisting 75 of these households, which would require the following financial resources:

Repairs average per unit	\$80,000	(Repairs, modifications, septic and site improvements)
Replacement average per unit	\$169,858	(Demolition, unit, installation, site and septic system improvements, additional weatherization, and relocation)
75 homeowners qualified	20 homes with repairs only	\$1,600,000
	55 homes for replacement	<u>\$9,342,120</u>
	<b>Total Cost Estimate</b>	<b>\$10,942,120</b>

**What are the projected impacts of your activities if implemented?**

The Manufactured Housing Rehabilitation Project offers practical solutions to address urgent housing challenges in Yuma. Through a strategic approach and steadfast commitment, this project aims to improve access to safe, decent, affordable housing, strengthen the resilience of Yuma’s housing stock, and enrich the fabric of our neighborhoods.

1. Increased Opportunities to Access Quality Affordable Housing:

- Through rehabilitation of 20 and replacement of 55 manufactured homes, residents will have access to safe, decent, and affordable housing options that meet their needs.
- Accessibility modifications will allow disabled and elderly people to remain in their homes, promoting inclusivity and ensuring that housing options cater to the diverse needs of the community.
- Improved housing conditions will enhance residents' quality of life and provide stability for individuals and families within the community.
- By addressing structural deficiencies and safety hazards, residents will feel more safe and secure in their homes, fostering a sense of belonging and community.

## 2. Enhanced Resilience of Manufactured Homes:

- Rehabilitation efforts will enhance the resilience of 20 manufactured housing units, making them more durable and able to withstand environmental challenges such as extreme heat weather, earthquakes, and flooding.
- Replacement of blighted 30 pre-1976 units and with modern, compliant homes will improve the overall resilience of the housing stock, reducing the risk of future damage and displacement.

## 3. Retention of the Availability of Unsubsidized Affordable Housing:

- Through the rehabilitation or replacement of 75 existing manufactured housing units, we preserve unsubsidized affordable housing options within the community, preventing displacement and preserving the affordability of existing housing stock.
- By implementing quality rehabilitation practices and utilizing durable materials, we aim to extend the lifespan of these units, reducing the need for frequent repairs or replacements and providing stable housing for residents in the long term.

## 4. Overall Benefit to the Community or Project Area:

- The implementation of these activities will result in a stronger, more resilient community with improved housing options.
- The project will have positive economic impacts, creating job opportunities, stimulating local businesses, and increasing property values within the project area.
  - Job Creation: The project will require a workforce to carry out construction, rehabilitation, and replacement activities. Hiring local contractors, construction workers, and skilled laborers will create job opportunities within the community. Additionally, the purchase of materials and supplies for the project will stimulate demand for goods and services, supporting local businesses and suppliers.
  - Increased Property Values: Rehabilitating existing manufactured homes and replacing blighted units will enhance the overall appearance and quality of neighborhoods. As a result, property values in the surrounding area may increase, benefiting homeowners and potentially attracting new investment in the community.
  - Stimulated Economic Activity: As homeowners invest in improvements to

their properties, such as installing energy-efficient appliances and implementing safety features, they contribute to local economic activity. Moreover, when improvements are made to one or more homes, it often encourages surrounding property owners to undertake similar improvements, thereby fostering a cycle of community-wide improvement and investment.

- Long-Term Cost Savings: Rehabilitating and replacing manufactured homes with modern, energy-efficient units offers residents the opportunity to achieve long-term cost savings on utility bills and maintenance expenses, thereby enhancing the affordability and sustainability of homeownership. Lower energy costs translate to more disposable income for residents, which can be spent on other goods and services, further stimulating economic activity in the community.
- Community Development: Improving the quality of housing stock can attract new residents and businesses to the area, contributing to community growth and development. A vibrant and well-maintained housing market can foster a sense of pride and stability among residents, encouraging community engagement and investment in local initiatives.

#### *Subfactor (b)(ii): Affordability and Equity*

#### **How will you ensure the availability of affordable manufactured housing options to LMI households?**

To ensure a balance between affordability and the opportunity for financial security and wealth building, the project is designed to assist those who own both the manufactured home and the lot. This approach allows us to directly impact homeowners' financial well-being and long-term stability.

The rehabilitation and replacement of owner-occupied manufactured homes will increase the overall value of each and the homeowner's equity in the home. By addressing critical housing needs such as structural deficiencies, and health and safety hazards, we not only enhance the quality of life for residents, but also boost the value of their personal and real property. These enhancements will lay a solid foundation for housing stability and wealth accumulation.

To further promote affordability and financial security, assistance will be offered through Deferred Payment Loans (DPLs) at zero percent (0%) interest. These loans will be secured by a Deed of Trust and promissory note. Replacements will have a 20-year loan term and rehabilitation will have a 15-year term. Under the terms of the DPL, the principal amount will decrease by 1/15 or 1/20 respectively each year. Participants will only need to repay the loan if they sell the property, transfer title, or cease to occupy the residence during the loan term. Upon successful completion of the commitment period, the DPL will be forgiven, providing homeowners with a valuable asset.

We will conduct annual loan servicing to ensure that participants are complying with the loan terms. During these annual reviews, participants will need to provide proof of residency, and electric bills to analyze energy use of unit before and after replacement/rehabilitation. These measures are designed to uphold the integrity of the program and to determine how much the energy efficiency improvements made to the ongoing affordability of the home.

By providing homeowners with zero-interest, deferred and forgivable loans, we provide essential repairs without the homeowner taking on additional debt. This equitable approach ensures that low-income families living paycheck to paycheck that lack resources can make repairs. It partially bridges the gap between them and non-LMI households, allowing them to allocate their minimal resources towards other pressing needs. Our goal is to foster long-term sustainability in homeownership for low and moderate-income households by not only upholding and increasing property values but also cultivating financial security.

We will ensure that the opportunity to participate in the Manufactured Housing Rehabilitation project reaches low- and moderate-income households in every corner of the community, especially those belonging to protected classes. To achieve this, we will actively engage in affirmative marketing efforts. We will partner with local community organizations that serve diverse populations, including people that physically and mentally disabled, farmworkers, the elderly, veterans, and those that serve all populations. This will allow us to effectively reach underserved communities and ensure they are aware of opportunities available to them. City staff will deliver information door-to-door in manufactured home communities.

Additionally, we will provide bilingual marketing materials to ensure language is not a barrier for anyone interested in participating. According to the City's Limited English Proficiency Language Plan, besides English, the language most spoken in Yuma is Spanish. Materials will be available in English and Spanish, ensuring that information about the project is accessible to all residents, regardless of language barriers. Furthermore, we recognize the importance of face-to-face interaction and community engagement. Therefore, we will host public meetings to provide opportunity for individuals to learn about the proposed project, ask questions, and provide input on the proposed plan. Meetings will also be accessible virtually, allowing for maximum participation and engagement.

By implementing these affirmative marketing efforts, we aim to create a level playing field and ensure that everyone in our community has equal access to participate in the project, regardless of their background.

### **What protections will be in place for residents?**

In the City's Manufactured Housing Rehabilitation project, we will not engage in rental activities, therefore lot rent and/or fee increases, eviction, paying arrearage, or other adverse actions do not apply to our project. Our focus is primarily on the rehabilitation and replacement of manufactured homes that are on lots owned and occupied by low-and moderate-income

households.

Since our project does not include rental housing, it does not directly align with federal civil rights laws such as Fannie Mae or Freddie Mac tenant protections, The White House Blueprint for a Renters Bill of Rights, or state, local, or Tribal laws and regulations related to tenant protections. However, we are fully committed to upholding the principles of the Fair Housing Act.

Neighborhood Services and contractors will comply with state and local regulations relating to housing rehabilitation and manufactured home replacement.

To adhere to the Fair Housing Act (FHA) in our project, we will implement the following measures across various aspects of the project:

- **Application Intake Process:** Ensuring fairness, transparency, and accessibility for all eligible individuals, while avoiding discriminatory questions based on race, religion, national origin, color, sex (including gender identity and sexual orientation), familial status, or disability.
- **Marketing Efforts:** Reflecting diversity and inclusivity in marketing materials, using language and imagery that promote a sense of belonging for all potential applicants, and disseminating project information through diverse channels to reach underserved populations.
- **Selection Criteria:** Using objective and non-discriminatory factors to establish selection criteria, focusing solely on housing need, eligibility, and program requirements.
- **Educational Workshops:** Referring applicants to educational workshops or informational sessions to help them understand their rights under the FHA and the project's commitment to fair housing practices.
- **Complaint Procedures:** Establishing clear procedures for addressing complaints related to fair housing issues, with staff trained to handle complaints sensitively and effectively to ensure compliance with fair housing requirements.

In the event of temporary displacement due to construction or replacement, we will adhere to guidelines outlined in the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA), as well as HUD Tenant Assistance, Relocation, and Real Property Acquisition (1378.0), and HUD Title 49 CFR Part 24. These regulations mandate that affected individuals are provided with appropriate relocation assistance and support during the temporary displacement period. The City will assist participants with securing temporary housing accommodations, facilitating access to essential services, and ensuring the safe storage of personal belongings during the construction phase.

City staff will work closely with participants to minimize disruption and inconvenience during

the relocation process. Clear communication channels will be established to keep residents informed about the timeline and progress of construction activities and to address any issues that may arise.

By following established relocation assistance policies, we will ensure that affected individuals are provided resources to navigate the temporary displacement period with minimal disruption to their lives.

**How does your proposal encourage access to resources and financing, especially for underserved communities and persons?**

Our project is designed to address the needs of underserved communities, including low-income families, communities of color, agricultural workers, the elderly, and individuals with disabilities. Here's how our project aims to increase accessible and affordable housing opportunities for these groups:

- Low-Income Families
  - We prioritize the rehabilitation and replacement of manufactured homes to preserve affordable housing options for very low and low-income families. By improving existing homes and offering replacement options with improved features, we will create safe living environments and reduce the financial burdens associated with housing.
- Communities of Color
  - Recognizing disparities in access to resources and services, we are committed to engaging with minority communities, including Hispanic or Latino populations, to ensure their voices are heard and their needs are addressed throughout the project. We will provide language-accessible materials and outreach efforts to facilitate their participation in decision-making processes.
- Agricultural Workers
  - Our project recognizes the crucial contribution of migrant workers to Yuma's agricultural industry and is committed to improving their living conditions. While many single migrant farmworkers are provided H2A housing by their employer, those with families may have a permanent home in Yuma in need of repairs. We will collaborate with community organizations and advocacy groups that work with migrant workers to ensure they are aware of the Manufactured Housing Rehabilitation program.
- Elderly Population
  - For the elderly population, we will incorporate accessibility modifications into

the rehabilitation or replacement of manufactured homes.

- Individuals with Disabilities
  - To support individuals with disabilities, we will ensure that rehabilitated and replacement homes meet accessibility standards, including wheelchair accessibility and sensory accommodations.

If assistance allocated to individual project sites exceeds the \$200,000 threshold, we will comply with Section 3 requirements. We will actively engage with local community organizations, minority business associations, and women-owned enterprises to increase awareness of contracting opportunities and encourage participation from underrepresented groups. Additionally, we aim to prioritize contracts with minority and women-owned businesses for goods and services related to the project, such as construction materials, equipment, and professional services.

### ***Subfactor (b)(iii): Environment and Resilience***

#### **What significant hazards could impact your project site(s)?**

Yuma's geographic location and climate render it susceptible to various natural hazards, including intense heat, flooding, drought, and seismic activity. Its scorching summers, often exceeding 115 degrees Fahrenheit, heighten the vulnerability of manufactured homes to adverse effects. Situated at the confluence of the Gila and Colorado rivers, the region faces significant swelling of these rivers during heavy rains, leading to flooding in low-lying areas. Despite not being directly on a major fault line, Yuma's proximity to active fault systems, such as the San Andreas Fault to the west, increases its seismic risk. Additionally, the region experiences tectonic activity associated with the Basin and Range Province to the north and northwest, further contributing to seismic concerns. Located in the Sonoran Desert, Yuma has low annual rainfall, high evaporation rates, and a heavy reliance on irrigation for crop production. These factors make Yuma inherently susceptible to drought conditions.

FEMA's National Risk Index identifies the following hazards in Yuma, including relatively moderate drought, earthquake, heat wave, and riverine flooding risks. The Manufactured Housing Rehabilitation Project will implement specific hazard mitigation activities to enhance the resilience of manufactured homes:

- Drought Risk Mitigation
  - Water Conservation Measures: Upgrade manufactured homes with water-saving fixtures and appliances to reduce water consumption and minimize the impact of drought conditions on residents' daily activities.
- Earthquake Risk Mitigation



- In accordance with the 2018 International Residential Code (IRC), overseen by the International Code Council, and the designation of the City of Yuma as Seismic Zone D, we commit to strict adherence to seismic risk reduction protocols in all residential and commercial construction projects. Specifically focusing on manufactured homes within Seismic Zone D, we will implement the comprehensive measures mandated by the 2018 IRC. These measures will include provisions for anchorage, foundation design, and structural reinforcement, which will be crucial in fortifying the structural integrity and safety of manufactured homes during seismic events.
- Heat Wave Risk Mitigation
  - We commit to implementing the International Energy Conservation Code adopted by the City of Yuma in 2009. This entails adhering to specific performance requirements for insulation, windows, heating, cooling, lighting, and other energy use items in both residential and commercial construction projects. By adopting these standards, we will address the existing gap in thermal insulation in homes and manufactured housing. This will involve the installation of comprehensive thermal barriers to minimize heat transfer through conduction, convection, and radiation. As a result, residents will benefit from reduced indoor temperatures and enhanced energy efficiency, providing a comfortable and sustainable living environment, particularly during heat wave events.
- Riverine Flooding Risk Mitigation
  - We will ensure that all manufactured homes rehabilitated or replaced within flood zones adhere to strict elevation and anchoring standards. These homes will be elevated one foot above the Base Flood Elevation and securely anchored to withstand flooding. Compliance with city regulations, including elevation standards and anchoring methods, is mandatory to guarantee safety and minimize flood damage. Certification by a professional engineer validates adherence to elevation requirements.

**How will your activities address the current and future threat of natural hazards, extreme weather, and disaster events?**

Yuma faces a range of extreme weather conditions, including heat waves, moderate drought risk, relatively moderate earthquake risk, and riverine flooding. These hazards pose significant challenges for manufactured homes in the region. Our project acknowledges the heightened vulnerability of LMI households. These households may encounter difficulties in preparing for, responding to, and recovering from extreme weather events due to limited financial resources, inadequate housing conditions, and health-related challenges.

Due to their lightweight construction and limited insulation, older manufactured homes are very inefficient and highly susceptible to overheating in the summer, exacerbated by inadequate ventilation. This prompts residents to heavily rely on air conditioning, leading to increased energy consumption. Many low-income families limit the use of air conditioning because they cannot afford the high electricity bills during the summer. This can lead to heat exhaustion and even death. Prolonged exposure to high temperatures can compromise the structural integrity, causing cracks, warping, and other damage to manufactured homes. Additionally, the heightened risk of fires during extreme heat events poses further threats, especially in fire-prone areas.

To tackle these challenges, we will comply with the 2009 International Energy Conservation Code (IECC). We will adopt energy-efficient measures outlined in Chapter 4 of the IECC, including enhanced insulation, effective air sealing, and the installation of high-performance windows to mitigate heat transfer and reduce energy consumption. Additionally, we will focus on optimizing HVAC efficiency and ventilation systems to ensure indoor comfort while minimizing cooling loads. These measures are crucial to ensure the overall comfort, safety, and long-term sustainability of housing for residents throughout the region.

To address drought challenges, our plan will aim to reduce water usage in Yuma's manufactured homes. Key steps include upgrading fixtures like faucets and toilets with water-efficient alternatives and replacing old appliances with modern, water-saving models. These measures aim to alleviate strain on local water resources, especially during dry spells, while ensuring residents' comfort and convenience.

Our project will reinforce manufactured homes to withstand earthquakes. Although Yuma is not on a major fault line, the proximity to active fault systems, like the San Andreas Fault, highlights the need for protective measures. Manufactured homes are particularly vulnerable due to their lightweight construction. Our plan includes techniques such as bracing and reinforcing connections to strengthen these homes against seismic events. Bringing existing homes up to code through retrofitting and integrating seismic-resistant design principles into replacements will bolster overall resilience to earthquakes in Yuma.

For projects in the floodplain, we will raise manufactured homes above the base flood elevation. We will ensure that all renovated or replaced homes in these areas meet strict elevation and anchoring standards, being raised one foot above the Base Flood Elevation and securely anchored to resist flooding. This approach addresses current flood risks and builds resilience against future flooding.

In addition to reinforcing manufactured homes against environmental hazards in Yuma, our proposal offers support to assisted households. We'll provide them with resources such as guidelines to create tailored hazard plans. Guidelines will cover various aspects, including receiving alerts, shelter plans, evacuation routes, family communication, and creating emergency kits. Tailored to each family's needs, these resources will help develop their own

plans that consider factors like age, responsibilities, frequented locations, medical needs, disabilities, and languages. Our goal is to equip assisted households with the tools they need for safety and resilience.

**How does your proposal help advance Environmental Justice (as defined in Section I.A.4 of this NOFO)?**

As an agricultural border community, Yuma faces a complex web of challenges intertwining occupational hazards, housing conditions, economic disparities, and social vulnerabilities that exacerbate vulnerability to heat-related environmental justice issues, particularly among low- and moderate-income (LMI) individuals, including those with occupations susceptible to high temperatures or heat waves.

Workers in occupations such as agriculture, construction, landscaping, and other outdoor labor-intensive jobs endure grueling conditions exposed to prolonged high temperatures that heighten the risk of heat-related illnesses like heat exhaustion and heat stroke. Limited access to shade and hydration adds to their vulnerability, amplifying the dangers of heat stress.

Meanwhile, housing conditions for LMI families often fall short, with substandard dwellings lacking adequate ventilation, insulation, and cooling systems. In these stifling environments, indoor heat intensifies during extreme temperatures, posing significant risks, especially for vulnerable populations such as the elderly, children, and individuals with pre-existing health conditions. Individuals who work outdoors in the summer need relief from the heat when they get home and when they sleep or they or at a higher risk of heat-related illnesses.

Compounding these challenges are economic disparities, as many LMI households struggle to afford essential cooling measures like air conditioning or protective clothing. Job insecurity and low wages further deter individuals from taking breaks or seeking relief from the sweltering heat while working.

Moreover, social vulnerabilities, including language barriers, immigration status concerns, and cultural factors, impede access to resources and information about heat-related risks and protective measures. These barriers exacerbate the community's susceptibility to heat-related environmental injustices, compounding the already significant challenges they face.

Our project will address the multifaceted challenges faced by low-income people in our community through the rehabilitation and replacement of blighted manufactured homes. We will adopt a comprehensive approach that considers their unique needs and vulnerabilities.

Efforts will focus on making upgrades to ensure adequate ventilation, insulation, and cooling systems in rehabilitated homes. This will significantly alleviate indoor heat during extreme temperatures, providing safer and more comfortable living conditions for vulnerable populations.

To address economic disparities and reduce vulnerability to heat-related illnesses, we will

incorporate energy-efficient appliances and modern cooling systems into rehabilitated homes that will make it more affordable to cool their home.

Rehabilitation and replacement projects will incorporate education and outreach information to raise awareness about heat-related risks and protective measures for assisted households. We will provide information in multiple languages, address cultural factors, and engage community leaders to overcome social vulnerabilities and empower residents to take proactive steps to protect their health and well-being during extreme heat events.

### ***Subfactor (b)(iv): Community Engagement***

#### **How will you seek and encourage diverse stakeholder participation?**

We are committed to ensuring meaningful stakeholder engagement throughout the project implementation process. We recognize the importance of considering and including input from a diverse range of stakeholders impacted by the proposed activities, including manufactured housing residents, nonprofits, fair housing organizations, manufactured housing developers, and general contractors.

Since our efforts will be directed towards low-income communities, our approach to stakeholder engagement will be even more intentional and focused on ensuring the participation of underserved groups. We acknowledge that low-income communities often face unique barriers to engagement, including limited access to resources, language barriers, and distrust of government entities.

To address these challenges, we will employ targeted outreach strategies tailored to the needs and preferences of low-income residents. This will include conducting outreach through non-profit service providers, manufactured home community centers, local churches, the food bank, and other trusted community hubs. We will also utilize culturally appropriate communication methods, such as bilingual materials and outreach conducted by community members who reflect the diversity of the population.

Additionally, we will actively seek input from community leaders, grassroots organizations, and advocacy groups that have existing relationships and credibility within low-income communities. These partnerships will help us reach residents who may otherwise be difficult to engage and ensure that their perspectives are incorporated into the decision-making process.

#### **How does your proposal align with existing community plans and policies?**

Our proposal for the Manufactured Housing Rehabilitation Project expands on the efforts described in the City of Yuma's General Plan, Consolidated Plan, and Analysis of Impediments to Fair Housing Choice. These plans collectively guide the city's efforts to address critical housing needs, promote affordable housing opportunities, and enhance community development initiatives. Our project helps to address the priorities outlined within them and contributes to meeting their goals for the community.

The project aligns closely with the Consolidated Plan. The City receives annual allocations of CDBG funds, and the Yuma County HOME Consortium receives annual allocations of HOME funds, however these resources are not nearly enough to fully address the numerous needs of low-income individuals. By focusing on the rehabilitation of existing owner-occupied manufactured housing units and the replacement of blighted pre-1976 units, our project directly supports these priorities. Leveraging existing resources and strategic priorities outlined in the City's plan, this project will help us to maximize impact. Specifically, our project contributes to a primary goal in the Plan – to improve the quality of existing owner-occupied housing stock, including home accessibility modifications, while enhancing the quality of neighborhoods with low-income concentrations, promoting inclusive community development for all residents.

In addition, our proposal is in conformance with the City's Analysis of Impediments (AI) to Fair Housing Choice, which identifies barriers to fair housing and outlines strategies to overcome them. Housing instability and displacement are most prevalent among low-income households, Limited English Proficiency (LEP) households, non-Hispanic and non-White households, and households that include a member with a disability. Through the rehabilitation and replacement of blighted manufactured homes, we will provide safe and decent housing options for these vulnerable groups facing these disparities. Moreover, the AI highlights that concentrations of poverty, racial and ethnic minorities, and poor housing quality persist. The resident survey identified low-income households, housing subsidy recipients, and residents with a disability to be most likely to deem their home in fair/poor condition. Our project aims to mitigate these challenges by improving housing quality and enhancing neighborhood conditions.

Our project also aligns with the goals outlined in the General Plan, which emphasizes the importance of supporting affordable housing initiatives and improving the overall quality of life for residents. Safe, decent, sanitary, and affordable housing for all residents is the primary housing goal of the City of Yuma. The City's definition of quality housing means integrating local standards with state and federal standards. This establishes a housing standard that the City will strive to achieve through implementation of its housing programs, as well as other City actions.

According to the Housing Element of the General Plan, housing units over 30 years old are likely to have rehabilitation needs, which may include plumbing, roof repairs, foundation work, electrical, and other repairs. If not maintained, housing can deteriorate over time, which can depress property values, discourage reinvestment, and impact the quality of life in a neighborhood. According to the 2019 American Community Survey, approximately 38 percent of the housing units in Yuma were constructed before 1980 and are now 40 years and older.

To address the issue of poor property maintenance that occurs on individual properties throughout the community, the City adopted the 2018 International Property Maintenance Code. This ensures that the safety and quality of housing in Yuma is maintained and improved.

Currently, the City does not have a distressed mobile home park/subdivision and RV park

improvement program. Many housing units needing moderate rehabilitation are mobile homes. Some RVs, which are manufactured for recreational use, are being used for permanent housing and are not well maintained. The City may consider a distressed mobile home park/subdivision and RV park improvement program to specifically target the needs of mobile homeowners. By rehabilitating existing housing stock and replacing blighted units, our proposal contributes to the city's broader vision of creating vibrant and sustainable neighborhoods where all residents have access to safe and affordable housing.

Overall, our proposal for the Manufactured Housing Rehabilitation Project is closely aligned with the City of Yuma's existing community plans and goals. By leveraging these existing strategic priorities, we can effectively address critical housing needs and promote equitable and inclusive community development initiatives.

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**Exhibit E: Capacity  
City of Yuma**

### ***Factor (c): Capacity***

#### **What experience do you have managing projects?**

The City of Yuma has implemented very successful revitalization efforts in two neighborhoods in Yuma. In around 2000 the Carver Park Neighborhood Revitalization Plan was initiated. The City developed the 10,000-square-foot MLK Neighborhood Center, rehabilitated 74 homes, partnered with a community-based development organization to construct 15 homes for first-time homebuyers, improved infrastructure and partnered with developers to build two Low Income Housing Tax Credit projects that brought 106 affordable housing units to the area.

Mesa Heights Neighborhood Revitalization efforts began in 2016. The City partnered with local nonprofit organizations to provide community services, partnered with a developer to construct 56 units of affordable housing, installed sewer infrastructure for 20 homes, installed 37 new streetlights assisted small businesses with façade improvements, and completed owner-occupied housing rehabilitation on 46 homes.

In 1997, the City implemented the Owner-Occupied Housing Rehabilitation program as a component of holistic neighborhood revitalization. The existing housing stock in need of rehabilitation is diverse, including both site-built and manufactured housing. The scope of rehabilitation projects can vary between a single minor repair, substantial rehabilitation, and complete demolition and reconstruction; with projects ranging from \$5,000 to \$280,000. Staff performs all aspects of project management, from customer intake, eligibility determination, design, procurement, on-site supervision of work performed by contractors, and ongoing loan servicing. This is to ensure that construction is completed according to contractual obligation and is in compliance with local, state, and federal standards while providing a quality finished product to the families we serve.

The City partners with many organizations when undergoing neighborhood revitalization efforts and housing rehabilitation. Our partners include:

- Frank Nunez, Principal of Gila Vista Junior High School
- Diana Veloz, Community Planning Manager at Yuma County
- Jack Valentine, Housing Program Manager at the Western Arizona Council of Governments
- Michael Morrissey, Executive Director of the Housing Authority of the City of Yuma

Furthermore, the success and positive impact of our Housing Rehabilitation Program can be attested by the residents who have benefited from it. The following participants are available to share their experiences:

- Wanda Rivera



- Leopoldo Sanchez
- Martin & Maria Torres
- Genaro & Maria Guerrero

For more detailed information or to be connected with these individuals, please contact Neighborhood Services at (928) 373-5187 or via email [neighborhoodservices@yumaaz.gov](mailto:neighborhoodservices@yumaaz.gov).

### **What is your experience using grant funds?**

The City of Yuma has been an Entitlement Community and recipient of Community Development Block Grant (CDBG) funds since 1991, acted as lead entity for a consortium of HOME funds since 2017. The City was used as an example of best practices during a U.S. Department of Housing and Urban Development National webinar for expedient and impactful use of CDBG-CV during the COVID-19 Pandemic.

The City of Yuma, on average, annually expends approximately \$900,000 in CDBG funds for a variety of neighborhood revitalization projects undertaken by staff or executed by subrecipients awarded CDBG funds through a competitive application process.

CDBG-funded projects are subjected to diligent oversight and monitoring through all phases of the project by key staff to ensure that projects are following federal regulations. Aside from foundational obligations related to CDBG projects, such as determining eligible activities, documenting national objectives and beneficiaries, compliance with federal regulations related to the Davis Bacon and Related Acts, Environmental Review, procurement requirements, Lead Safe Housing Rule, Universal Relocation Act, Section 3, and Fair Housing Act are built into the project planning and workflow to ensure successful and compliant use of grant funds.

The City led efforts to form a consortium with Yuma County, the Cities of Somerton and San Luis, and the Town of Wellton to become a participating jurisdiction of the HOME Investment Partnership Program. In 2017, the Yuma County HOME Consortium was approved by HUD and received its first allocation of HOME funds. The City continues to be the lead entity of the Consortium and manages all components of the HOME program. City staff is responsible for managing the Consortium board, developing Consolidated Plans, Annual Action Plans, CAPERs, managing subrecipients, project management, monitoring, underwriting, and all other HOME requirements.

Over the years, the City has undergone monitoring by the HUD Phoenix field office and has received very few Notices of Concerns or Findings, which were resolved expediently.

### **Who are your key staff?**

The following key City of Yuma staff responsible for project leadership, management, and implementation are:

- Nikki Hoogendoorn (Neighborhood Services Manager) brings 24 years of experience managing CDBG projects and 7 years with HOME.
- Jay Nance (Neighborhood Services Manager) possesses extensive experience managing construction projects and 8 years of experience managing CDBG and HOME construction projects.
- Jorge Alcala (Neighborhood Services Specialist) holds 4 years of experience administering housing rehabilitation projects.
- Tad Zavodsky (Neighborhood Services Specialist) has 22 years of experience managing federal grant compliance and 10 years of experience in managing housing programs.
- Kassandra Granados (Neighborhood Services Specialist) has experience coordinating and implementing the citizen participation process.
- Nadia Rangel (Neighborhood Services Specialist) focuses on grant compliance and financial management.
- Andrea Lopez (Administrative Specialist) brings 11 years of experience in office administration and customer service.

They will have the following responsibilities throughout the project:

	Initiation	Planning	Execution	Monitoring & Controlling	Closeout
<b>Nikki Hoogendoorn</b>	<ul style="list-style-type: none"> <li>• Grant Application</li> <li>• Project Charter</li> </ul>	<ul style="list-style-type: none"> <li>• Goal Setting</li> <li>• Project Scope</li> <li>• Project Schedule</li> <li>• Project Budget</li> <li>• Federal Compliance Integration</li> <li>• Equitable Outcomes</li> </ul>	<ul style="list-style-type: none"> <li>• Execute Grant Documents – City Council Process</li> <li>• Project Budget Management</li> </ul>	<ul style="list-style-type: none"> <li>• Contract Compliance Management</li> <li>• Dispute Resolution</li> </ul>	<ul style="list-style-type: none"> <li>• Close Out</li> <li>• Lessons Learned</li> </ul>
<b>Jay Nance</b>	<ul style="list-style-type: none"> <li>• Project Charter</li> </ul>	<ul style="list-style-type: none"> <li>• Goal Setting</li> <li>• Project Scope</li> <li>• Project Schedule</li> <li>• Project Budget</li> <li>• Workload Assessment</li> <li>• Federal Compliance Integration</li> </ul>	<ul style="list-style-type: none"> <li>• Project Budget Management</li> <li>• Schedule Management</li> <li>• Federal Compliance Integration</li> <li>• Contractor Procurement</li> </ul>	<ul style="list-style-type: none"> <li>• Contract Compliance Management</li> <li>• Quality Control Management</li> </ul>	<ul style="list-style-type: none"> <li>• Close Out</li> <li>• Lessons Learned</li> </ul>

<b>Kassandra Granados</b>	<ul style="list-style-type: none"> <li>• Citizen Participation</li> <li>• Public Engagement</li> </ul>	<ul style="list-style-type: none"> <li>• Public Outreach</li> <li>• Project Marketing</li> <li>• Equitable Outcomes</li> </ul>			<ul style="list-style-type: none"> <li>• Close Out</li> <li>• Lessons Learned</li> </ul>
<b>Jorge Alcala</b>		<ul style="list-style-type: none"> <li>• Workload Assessment</li> <li>• Customer Intake</li> <li>• Customer Eligibility</li> </ul>	<ul style="list-style-type: none"> <li>• Federal Compliance Integration</li> <li>• Individual Project Management</li> <li>• Customer Engagement</li> </ul>		<ul style="list-style-type: none"> <li>• Close Out</li> <li>• Lessons Learned</li> </ul>
<b>Tad Zavodsky</b>		<ul style="list-style-type: none"> <li>• Federal Compliance</li> </ul>	<ul style="list-style-type: none"> <li>• Federal Compliance Integration</li> <li>• Environmental Review</li> </ul>		<ul style="list-style-type: none"> <li>• Close Out</li> <li>• Lessons Learned</li> </ul>
<b>Andrea Lopez</b>			<ul style="list-style-type: none"> <li>• Customer Waitlist Management</li> </ul>		<ul style="list-style-type: none"> <li>• Ongoing</li> <li>• Loan Servicing</li> <li>• Close Out</li> <li>• Lessons Learned</li> </ul>
<b>Ray Roberson</b>		<ul style="list-style-type: none"> <li>• Customer Intake</li> <li>• Customer Eligibility</li> </ul>			<ul style="list-style-type: none"> <li>• Close Out</li> <li>• Lessons Learned</li> </ul>
<b>Nadia Rangel</b>	<ul style="list-style-type: none"> <li>• Grant Application</li> </ul>		<ul style="list-style-type: none"> <li>• Financial Management Draw Requests</li> </ul>	<ul style="list-style-type: none"> <li>• Reporting</li> </ul>	<ul style="list-style-type: none"> <li>• Close Out</li> <li>• Lessons Learned</li> </ul>

The City's Neighborhood Services Division effectively trains multiple staff members across various functions to mitigate the impact of staff turnover. The contingency plan for addressing vacancies or staff loss during the project is outlined as follows:

- Leadership, Management: Assumption of vacated primary project responsibilities by Neighborhood Services Managers, delegation of any auxiliary responsibilities to existing cross-trained staff.
- Implementation – Assignment of vacated responsibilities to existing cross-trained staff.

If awarded funding, the City will hire experienced contractors, including general contractors and manufactured home contractors as soon as a funding notification is received. The City will comply with federal, state, and local procurement regulations.

**What is your experience promoting racial equity?**

Due to its geographic location, The City of Yuma has long advanced racial equity through elements of customer service and outcomes.

One of the purposes of the City's holistic approach to neighborhood revitalization is to improve the quality of life for people that live in areas with highest concentrations of poverty to reduce the gap in racial equity. The goal is to create opportunities for access to decent affordable housing, upgrade infrastructure and amenities, and access to needed social services.

In a primarily Hispanic/Latino community, a language barrier exists, potentially resulting in missed housing opportunities or a lack of trust in local government programs due to ineffective communication.

The City of Yuma offers bilingual outreach, literature, and technical documentation concerning our neighborhood revitalization initiatives, aiming to overcome language barriers and ensure equitable access to housing.

**What is your experience completing environmental reviews?**

We have a dedicated specialist on our team who brings over 11 years of experience in completing 24 CFR Part 58 environmental reviews for HUD-funded projects in the City of Yuma. This specialist possesses extensive knowledge of HEROS and the RROF process, having conducted Environmental Assessments, CEST tiered reviews, both converting to Exempt and requiring the RROF process. We also have a staff person who is trained as a backup to complete environmental reviews. Both team members remain up to date with all CPD notices, regulatory changes, and updated training materials to ensure the production of accurate and timely environmental reviews for our programs and subrecipient projects.

**Are you familiar with cross-cutting federal requirements?**

The City of Yuma operates with multiple funding sources, namely CDBG and HOME, and by necessity integrates federal cross-cutting requirements into our planning and workflow to ensure compliance. The diverse scope of programs undertaken in neighborhood revitalization requires compliance with several regulations such as the Davis Bacon and Related Acts, Environmental Review, Lead Safe Housing Rule, Universal Relocation Act, Section 3, and Fair Housing Act.

Compliance with CFR 2 Part 200 is achieved through internal controls, monitoring, audits, and prompt action on audit findings.

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**Exhibit F: Match or Leverage  
City of Yuma**

***Factor (d): Match of Leverage***

The City of Yuma is committed to supporting the Manufactured Housing Rehabilitation Program by providing \$111,567 in in-kind contributions. These contributions will cover personnel, transportation, and office supply costs essential for the administration of the program. While we understand that in-kind match doesn't qualify for points under the NOFO, we believe it's crucial to demonstrate the City's support for this initiative.

The City of Yuma will match grant funds with some of the costs to administer the Manufactured Housing Rehabilitation & Replacement Project. City general funds will support various aspects of program administration, including personnel costs, vehicle expenses for site visits, telecommunication expenses for tablets and cell phones, postage, printing, and permit/inspection fees.

Specifically, the City is contributing \$81,247 in in-kind match from the general fund for personnel costs. While we understand that these funds are not eligible as match or leverage, we believe it's important to demonstrate our support for this project. Additionally, the City is covering general operating costs, including \$1,508 for vehicle expenses, \$156 for office supplies, \$146 for postage, \$238 for printing, and \$4,608 for telecommunications for cell phones and tablets. The total in-kind match amounts to \$87,903

Furthermore, the City is allocating funds for permit costs, which encompass inspection fees for all rehabilitation or replacement activities related to manufactured homes and associated construction. Depending on the specific work conducted at each site, permit/inspection fees may range from \$50 for pit set installation to \$400 for manufactured home installation. The total estimated cost for these permits is \$31,000, which is firmly committed to supporting this program. See the attached commitment letter in Attachment F.

If the City is awarded less funding than initially requested, it's crucial to adjust the program goals and activities accordingly. This may involve prioritizing certain projects or seeking alternative sources of funding to bridge the gap. By remaining flexible and adaptable, the program can still make meaningful progress toward its objectives despite potential budget constraints.

In the event of internal budget risks within the City's general fund, we will apply for Community Development Block Grant (CDBG) funds to supplement the administration of the Manufactured Housing Rehabilitation Project. CDBG funds can provide additional financial support to ensure the program's continuity and enable the completion of essential activities. Leveraging this alternative funding source allows us to mitigate the impact of budget uncertainties and sustain momentum towards achieving our goals.

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**Exhibit G: Long-Term Effect  
City of Yuma**

This project will have long-term effects for low-and moderate-income (LMI) manufactured/mobile homeowners in Yuma and the community as a whole. The primary goal of this project is to assist income-eligible homeowners with critical repairs or replacement of their units to improve the health and safety of their living environment and improve their quality of life. Manufactured home rehabilitation and replacement is an important strategy to help preserve the available housing stock and promote sustainable neighborhoods. Investment in aging housing stock is vital given the persistence of substandard housing conditions in Yuma.

The rehabilitation of existing housing stock plays an important role in addressing the general problem of housing undersupply. Simply put, there is a shortage of safe, decent, and sanitary housing in Yuma, especially housing that is affordable for low-income residents. A majority of the mobile and manufactured homes in Yuma were built 40 years ago or more. Many of them owned by LMI residents are in disrepair and need a significant amount of work to continue to be a long-term housing option.

The City of Yuma is planning to assist residents that own the property and own and occupy the manufactured home. The Manufactured Home Rehabilitation program will require homeowners who participate to live in the home for at least 15 years or repay the deferred loan. At the end of the term, the loan is forgiven. If the owner chooses to sell the home either during the loan term or after, the new or improved unit would be sold to another family. The improved manufactured housing stock that this grant can provide, will not only benefit the current homeowners, but families that may purchase one of these homes in the future. These households will not be priced out because they will already own the property. This will be an owner-occupied rehabilitation program. We do not plan to offer this program for rental housing.

The City will use guidelines from the well-established Owner-Occupied Housing Rehabilitation program. The City has operated this program for approximately 30 years. The owner must remain in the home long-term. Deferred Payment Loans (DPLs) will be provided at zero percent (0%) interest and secured with a Deed of Trust and Promissory Note. The loan amount will include the total cost of the improvements and the term is based upon the total loan amount as follows:

<b>Loan Amount</b>	<b>Loan Term</b>
<b>\$40,000+</b>	15 Years
<b>Manufactured Home Replacement</b>	20 Years

Each year the principal will decrease by 1/loan term. The City will not require payback unless the participant sells, transfers title, or ceases to occupy the residency. Upon successful completion of the loan term/affordability period, the loan is forgiven. The program will not be offered to renters.



The Manufactured Home Rehabilitation Project is designed to support stable homeownership options for residents who own both their mobile/manufactured home and the lot it sits on. By focusing on improving the safety and accessibility of these homes, the program directly contributes to the long-term viability of homeownership for (LMI) people. Many manufactured homes surveyed were found to have safety hazards, particularly concerning inadequate ramps and other accessibility issues, which pose significant challenges for elderly residents. Through the implementation of safe ramp construction, sidewalk improvements, bathroom modifications, and other necessary adjustments, this project aims to create a safer living environment conducive to aging in place. By addressing these critical needs, residents can remain in their homes comfortably and securely, reducing the likelihood of displacement to assisted living facilities.

One of the goals of the program is to enable elderly homeowners to age in place by providing essential home modifications that enhance their quality of life and overall well-being. By ensuring that manufactured homes are equipped with the necessary safety features and accessibility enhancements, residents can maintain their independence and autonomy, fostering a sense of stability and continuity within their community.

While the program may not directly promote homeownership, it plays a vital role in preserving and improving the housing stock available to LMI families. By offering much-needed replacement, repairs, and modifications that residents may otherwise be unable to afford, the program ensures that homes are safe, decent, and sanitary. This not only protects the health and well-being of residents but also helps to maintain the overall integrity of the community.

The Manufactured Home Rehabilitation Project serves as a critical intervention to promote stable homeownership options in the long term by addressing safety and accessibility concerns, supporting aging in place, and ensuring that LMI families have access to safe, decent, and sanitary housing. By investing in the preservation and improvement of manufactured homes, the program contributes to the overall stability and sustainability of homeownership within underserved communities.

This project directly addresses the needs of underserved communities by offering safety and accessibility improvements in manufactured homes, in addition to repairs or replacement. By targeting issues such as unsafe wheelchair ramps and inferior materials, the project aims to remove barriers that hinder the ability of disabled and elderly individuals to live comfortably and securely in their homes and age in place. This proactive approach not only enhances the quality of life for vulnerable populations but also fosters a sense of inclusion and belonging within the community.

In addition to addressing immediate safety concerns, our proposal recognizes the importance of enabling underserved communities, particularly low-income families and those of color, to build wealth over the long term. By improving or replacing manufactured homes, the project not only enhances the safety and quality of housing, but also increases the overall value of

properties. This, in turn, creates opportunities for homeowners to build equity and accumulate assets, contributing to long-term wealth-building prospects within the community and promoting economic empowerment.

Our project embodies a comprehensive approach to addressing housing accessibility, safety, and quality, thereby advancing housing access, justice, and long-term wealth-building opportunities for underserved communities, particularly those of color. By investing in the improvement of manufactured homes and prioritizing the needs of vulnerable populations, the project lays the foundation for a more inclusive and resilient community.

Yuma's extreme summer heat presents significant challenges for residents of older manufactured homes, many of which lack proper insulation and efficient cooling systems. Energy efficiency improvements aim to alleviate these challenges by reducing electricity consumption, lowering utility bills, and creating a more comfortable living environment. By enhancing the thermal performance of homes, residents can maintain cooler indoor temperatures, thereby reducing the risk of heat-related illnesses and improving overall comfort and well-being.

High summer utility bills often force low-income residents to limit their use of cooling systems, compromising their comfort and safety, particularly during extreme heat events. By making energy efficiency improvements, this project not only enhances affordability by reducing utility expenses but also ensures that homes can be comfortably maintained at more desirable temperatures throughout the year. This promotes resident health and productivity, especially for vulnerable populations and individuals who work outdoors during the day, by providing a cool and safe refuge from the heat.

In addition to immediate cost savings and comfort improvements, the energy efficiency measures implemented through your proposal offer long-term benefits for residents and the community as a whole. By reducing energy consumption and greenhouse gas emissions, the program contributes to environmental sustainability and resilience, helping to mitigate the impacts of climate change and enhance the overall resilience of manufactured housing in the face of future challenges.

## Attachment A: Advancing Racial Equity

In our examination of the racial composition of individuals or households expected to benefit from proposed PRICE activities, we consulted U.S Census Bureau 2023 estimated demographic data, revealing a diverse population within our community.

Racial Composition of Community (2023 US Census Estimates)	
Racial Group	Percentage
White alone	57.9%
Black or African American alone	2.2%
American Indian and Alaska Native alone	1.1%
Asian alone	2.0%
Native Hawaiian and Other Pacific Islander alone	0.0%
Two or More Races	21.9%
Hispanic or Latino	62.1%
White alone, not Hispanic or Latino	30.6%

Our Consolidated Plan identified significant housing challenges among minority households across various income brackets. Black and Asian households consistently experience disproportionately high rates of housing problems compared to White households, even when adjusted for income levels. Hispanic households constitute a larger portion of the population in certain income brackets, also face significant disparities, particularly in the 30-50% and 50-80% AMI categories, highlighting the urgent need for targeted support to address these inequalities.

Summary of NA-15 Disproportionately Greater Need: Housing Problems 91.405, 91.205 (b)(2)			
Income Range	Race/Ethnicity	Has one or more of four housing problems	Has none of the four housing problems
<b>0-30% AMI</b>	Jurisdiction as a whole	5,005	815
	White	1,350	195
	Black/African American	70	0
	Asian	300	0
	American Indian, Alaska Native	39	40
	Pacific Islander	0	0
	Hispanic	3,425	535
<b>30-50% AMI</b>	Jurisdiction as a whole	5,285	2,460
	White	1,345	1,140
	Black/African American	55	0
	Asian	45	0
	American Indian, Alaska Native	49	45
	Pacific Islander	0	0
	Hispanic	3,740	1,260
<b>50-80% AMI</b>	Jurisdiction as a whole	6,430	5,835
	White	1,765	2,335
	Black/African American	790	35

	Asian	70	25
	American Indian, Alaska Native	14	65
	Pacific Islander	30	0
	Hispanic	4,195	3,325

The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Through this analysis, we have identified potential barriers to equitable participation and benefit among communities of color, including underrepresentation, disproportionate representation, and disparities in access to resources.

In addressing these barriers and promoting racial equity in our grant activities, we have developed a multifaceted approach:

- **Equitable Access:** We will collaborate with local nonprofits and community organizations serving diverse racial and ethnic communities to maximize our outreach efforts and provide culturally competent services, ensuring equitable access.
- **Anti-Discrimination Policies:** We will strictly adhere to federal nondiscrimination requirements and implement policies that prohibit discrimination on the basis of race, ethnicity, or any other protected class throughout all stages of the project.
- **Data Monitoring and Evaluation:** We will collect demographic information as part of the application process to track the racial composition of program participants and ensure accountability in equity efforts.

To track our progress and evaluate the effectiveness of our efforts to advance racial equity, we will:

- Regularly review demographic data to evaluate the racial composition of program participants, ensuring equitable distribution of resources, assessing the effectiveness of our equity initiatives, and identifying areas for improvement.
- Engage in transparent reporting and accountability mechanisms to communicate our progress and outcomes to stakeholders and the broader community.

## **Attachment B: Affirmative Marketing**

The Manufactured Housing Rehabilitation and Replacement Program aims to both improve the quality of life in minority communities and safeguard a significant portion of affordable housing. As a city proud of its diverse community, the City of Yuma is steadfast in its commitment to fostering inclusive community participation. Our focus extends to engaging agencies offering housing or social services, as well as residents from low-and-moderate-income neighborhoods, individuals with disabilities, those with limited English proficiency, elderly individuals, and Hispanic and Black communities. Our project is dedicated to addressing the issue of limited awareness of grant-funded opportunities among individuals in marginalized communities. We aim to overcome this challenge through affirmative marketing practices.

In Yuma, a sizable segment of the population faces language barriers, primarily stemming from limited English proficiency. To ensure effective outreach to this demographic, we are implementing various initiatives. Firstly, project information will be disseminated through publication in the Spanish newspaper, Bajo el Sol. Additionally, all grant materials, including applications and instructions, will be provided in Spanish. Furthermore, our staff will offer one-on-one assistance with the application process, catering to individuals requiring additional support, such as those with limited English proficiency, disabilities, or elderly individuals. Our overarching objective is to actively engage individuals who may not typically apply due to various barriers.

To effectively promote this project, our team will undertake flyer distribution and door-to-door outreach to reach individuals facing transportation obstacles or mobility limitations. Brochures will be distributed at community events to ensure broad dissemination of project details. Moreover, project information will be prominently displayed on the City of Yuma website. Flyers will be strategically placed in key public buildings, including main libraries, City Hall, and the Housing Authority of the City of Yuma (HACY).

The City of Yuma has established strong partnerships with non-profit organizations to disseminate information about our programs and projects, and we remain committed to this collaboration. Through bi-monthly meetings, we actively engage in discussions about funding opportunities tailored to minority communities. We are dedicated to sharing project information with agencies specifically serving these populations. Our goal is to ensure that all individuals in our local area and nearby communities are aware of the opportunities provided by this grant and feel encouraged to apply.

## **Attachment C: Affirmatively Furthering Fair Housing**

The City of Yuma is dedicated to fostering an inclusive community where non-discrimination, equal access, and the preservation of housing for low- and moderate-income residents, as well as under-represented ethnic and racial groups, are paramount. We firmly stand against any form of discrimination based on race, color, national origin, religion, sex, disability, or familial status. Recognizing Yuma as a border town with a diverse growing population, we are committed to actively engaging with underserved communities to ensure their needs are met throughout our project.

In line with the City's Analysis of Impediments to Fair Housing Choice and our project-specific needs assessment, we have identified several barriers to affordable fair housing impacting our community. These encompass financial constraints, limited access to information, language and cultural disparities, and challenges associated with disabilities. Recognizing these obstacles enables us to formulate targeted strategies aimed at addressing them, thereby ensuring equitable access to housing opportunities for all residents.

To address limited access to information and language barriers, we will ensure meaningful language access for individuals with limited English proficiency. Spanish interpreters will be provided upon request during project planning and application processes. Additionally, all applications, materials, and flyers will be made available both in Spanish and online. Our selection criteria will remain objective and non-discriminatory, focusing solely on housing need, eligibility, and program requirements. Additionally, to promote fair housing practices, our publications, brochures, and outreach materials will prominently feature the Fair Housing and Equal Opportunity Logo, reinforcing our dedication to fostering equitable housing opportunities.

In our community, we have observed a significant presence of elderly individuals residing in manufactured homes, often featuring unsafe wheelchair ramps. Addressing this pressing need for accessibility modifications is essential. Our initiatives will prioritize preserving affordable housing by rehabilitating homes occupied by disabled, elderly, and low-income homeowners. These efforts aim to ensure safe, decent, and sanitary housing while improving conditions in high-poverty areas. Project priorities include eliminating health and safety code violations, enhancing accessibility for individuals with disabilities, and improving energy efficiency. Reasonable accommodations will be provided to anyone requesting adjustments due to disability at any stage of the application and homeowners' selection process. Additionally, we will refer participants to partner local non-profits that offer services such as support for the elderly, financial counseling, behavioral health resources, and childcare assistance. By addressing residents' broader needs, we aim to improve their quality of life, overcome barriers to economic stability and social mobility, and contribute to the revitalization of underserved areas.

Limited financial resources often hinder underserved communities' ability to maintain their

homes. The costs associated with major repairs, maintenance, and replacing blighted properties often exceed the means of many Low- to Moderate-Income (LMI) families. Additionally, many of these families would not qualify for a loan to cover the necessary repairs or secure a new mortgage. Our project works through Deferrable Payment Loans, for which after successful compliance of the commitment period, is forgiven. The program's participation criteria, based on income, housing need, and location, are less strict than those for purchasing a new home or obtaining a loan, with no credit checks required. By covering the costs of repairs and offering this potentially forgivable loan, we effectively reduce the financial barrier that many LMI households face.

Furthermore, our commitment to education and outreach remains steadfast. We will continue partnering with the Southwest Fair Housing Council to organize community outreach events, providing presentations on fair housing laws and guidance on reporting violations. Transparent procedures for handling fair housing complaints, along with staff training, ensure sensitivity and efficiency in upholding fair housing standards and compliance with civil rights laws. Our ongoing focus is on promoting equal access and safeguarding housing options for low-income families in our community.

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### **Attachment D: Eligible Applicants**

The City of Yuma is an eligible applicant. Under Section III.A of the HUD PRICE NOFO, the City is classified as "01-City or Township Governments."

The City of Yuma has a valid Universal Entity Identifier in Sam.gov.

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**Attachment E: Evidence of Partnership**

Not applicable. The City of Yuma is the sole applicant and is not partnering with other entities. If awarded, the City of Yuma will follow federal procurement regulations to hire licensed contractors for the rehabilitation and replacement of manufactured homes and other associated services.

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