

City of Phoenix, Arizona  
Preservation and Reinvestment Initiative for Community Enhancement Application  
U.S. Department of Housing and Urban Development  
Community Planning and Development  
Preservation and Reinvestment Initiative for Community Enhancement (PRICE)  
Funding Opportunity Number: FR-6700-N-99

**Table of Contents**

**Table of Contents**..... i

**Narrative Exhibits**

Exhibit A: Executive Summary ..... 1  
Exhibit B: Threshold Requirements and Other Submission Requirements ..... 4  
Exhibit C: Need..... 6  
Exhibit D: Soundness of Approach..... 13  
Exhibit E: Capacity ..... 32  
Exhibit F: Leverage..... 43  
Exhibit G: Long-term Effect..... 44

**Attachments**

- Attachment A: Advancing Racial Equity
- Attachment B: Affirmative Marketing
- Attachment C: Affirmatively Furthering Fair Housing
- Attachment D: Eligible Applicants
- Attachment E: Evidence of Partnership Letters
- Attachment F: Match or Leverage
- Attachment G: Application Certifications and Standard Forms
- Attachment H: Summary of Comments on Published Application

**Exhibit A - Executive Summary**  
**City of Phoenix**

## City of Phoenix, Arizona

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

The City of Phoenix is the fifth most populous city in the United States, covering 518 square miles and a rapidly growing population exceeding 1.6 million. As one of the fastest-growing major cities, Phoenix is characterized by its vibrant diversity and deep-rooted history. Despite its growth, the city faces a pressing housing crisis exacerbated by population increases that outpace the availability of affordable housing, rising costs, and aging private infrastructure. In response, Phoenix has embarked on an ambitious journey to create or preserve 50,000 housing units by 2030.

In the last three years alone, the City of Phoenix has dedicated over \$110 million toward affordable housing initiatives, significantly impacting housing stability and accessibility across the community. This commitment is part of a broader strategy to increase housing availability and enhance the quality of life for all residents, focusing on vulnerable populations such as low-income families, non-white, indigenous, people of color, seniors, and individuals with disabilities.

In 2022, over 165 households of three mobile home communities within the City of Phoenix, Las Casitas, Weldon Court, and Periwinkle, faced displacement due to private acquisition and redevelopment plans of existing mobile home park sites. Many residents of these communities contacted the City of Phoenix to seek assistance. In response to these concerns and in coordination with the Phoenix City Council, the City Manager formed a task force to determine how the city could assist families facing displacement. The team evaluated all legal and financial assistance the City could offer to the residents impacted by the private displacement, including both short-term and long-term solutions.

To provide immediate solutions, in 2023, the Mobile Home Resident Relocation Team comprised of staff from the Human Services, Housing, and Neighborhood Services departments, and the Office of Homeless Solutions engaged impacted residents in partnership with the Phoenix IDA, Trellis, and Helping Families in Need. This team collaborated with City executives from various departments and provided housing navigation, case management, housing vouchers, and rent and utility assistance to residents displaced from three mobile home parks. As of November 2023, over 160 residents have secured permanent housing, with two remaining residents finalizing permanent housing. Staff, including over 45 Human Services Department caseworkers and supervisors, participated in numerous community meetings, resource events, one-on-one engagements, and stakeholder coordination meetings and provided regular updates to the respective council offices... All impacted households avoided homelessness.

Utilizing American Rescue Plan Act funds, housing navigation, case management, housing vouchers, and rent and utility assistance were offered to households at risk of displacement as an immediate solution.

The team also reviewed options to develop long-term strategies to prevent this from happening again. The City of Phoenix is seeking \$75M in funding from the HUD PRICE Main Program to provide the necessary financial resources to help establish and expand these vital programs.

City of Phoenix, Arizona  
Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Application

*PRICE Grant Utilization Plan*

With the HUD Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Main grant, the City of Phoenix has a clear plan to modernize, revitalize, and preserve our city's Manufactured Housing Communities (MHCs) and individual manufactured homes to maintain this Naturally Occurring Affordable Housing (NOAH) stock. These initiatives are designed to continue the short-term solutions implemented as a result of previous displacement concerns, in addition to creating programs that would allow the city to embark on long-term preservation strategies. Our targeted initiatives under the PRICE grant are as follows:

- **Rehabilitation, Repair, and Replacement:** We plan to rehabilitate or repair Manufactured Homes with critical upgrades like roofing, HVAC systems, electrical and plumbing, and weatherproofing to withstand extreme heat and monsoon seasons, preserving and promoting healthy, safe and sustainable housing for LMI residents. We will also offer financial assistance for the replacement of units where rehabilitation is not viable due to cost and/or condition, and for pre-1976 manufactured homes that fail to meet current safety and efficiency standards.
- **Community Transformation through Preservation:** A significant milestone will be converting two to three MHCs into resident-owned communities (ROCs) in collaboration with ROC USA or another non-profit, promoting long-term affordability to prevent displacement and foster community ownership.
- **Infrastructure Enhancements:** We are committed to bolstering the resilience of Manufactured Housing Communities (MHCs) against natural disasters and significantly enhancing their livability. Our strategy includes comprehensive upgrades to crucial infrastructure components such as drainage systems, lighting, plumbing, electrical systems, and site pad repairs. Additionally, we will revitalize communal facilities to enrich community life. We have strategically prioritized MHCs where more than 51% of the residents are classified as low to moderate-income (LMI), ensuring that our efforts directly benefit those most needing improved living conditions.
- **Comprehensive Resident Services:** In partnership with the City of Phoenix Human Services Department, beginning in year two, we will provide comprehensive case management to an estimated 480 manufactured housing households per year (2,400 in total), helping them navigate and connect with essential resources such as educational materials, financial programs, utility assistance, and other critical services. This support aims to enhance residents' overall well-being and stability, ensuring they have access to the necessary tools to improve their living conditions and maintain housing security.

These actions are integral to the City's Housing Phoenix Plan, prioritizing preserving our existing housing supply and maintaining affordable living conditions. By improving housing stability, we aim to prevent displacement, reduce the risk of homelessness, and enhance community resilience.

City of Phoenix, Arizona

Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Application

*Financial Strategy and Program Oversight*

The City of Phoenix intends to fund these crucial housing initiatives by strategically utilizing \$75,000,000 from the PRICE grant. This will be supplemented by Phoenix's other financial resources to ensure comprehensive project support and sustainability. The Phoenix Housing Department will oversee the administration of this grant, coordinating closely with the Neighborhood Services and Human Services departments to ensure effective implementation and adherence to all regulatory requirements.

The Housing Department's robust oversight capabilities and proven track record in managing large-scale projects position us to leverage these funds successfully and make a lasting impact on our community's housing landscape.

This PRICE grant initiative represents a pivotal component of Phoenix's comprehensive approach to resolving critical housing issues. By enhancing the infrastructure of MHCs and upgrading individual housing units, the City of Phoenix will improve the quality and safety of housing and empower residents through sustainable community ownership models like ROCs. This strategic approach aligns with our overarching goal of creating a resilient, inclusive city where every resident has access to safe, affordable housing, supporting our broader mission to preserve and expand our housing stock as we march toward our 2030 goal.

City of Phoenix, Arizona  
Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Application

**Exhibit B - Threshold Requirements and Other Submission Requirements**  
**City of Phoenix**

### *Resolution of Civil Rights Matters*

As of the submission date of this application, the City of Phoenix Housing Department (the proposed recipient of HUD's PRICE Grant) has not:

1. Received charges or cause determinations from HUD concerning a systemic violation of the Fair Housing Act or receipt of a cause determination from a substantially equivalent state or local fair housing agency concerning a systemic violation of a substantially equivalent state or local fair housing law proscribing discrimination because of race, color, religion, sex (including sexual orientation and gender identity), national origin, disability or familial status;
2. Been a defendant in a Fair Housing Act lawsuit filed by the United States alleging a pattern or practice of discrimination or denial of rights to a group of persons raising an issue of general public importance under 42 U.S.C. 3614(a);
3. Been a defendant in any other lawsuit filed or joined by the Department of Justice, or in which the Department of Justice has intervened, or filed an amicus brief or statement of interest, alleging a pattern or practice or systemic violation of Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Section 109 of the Housing and Community Development Act of 1974, the Americans with Disabilities Page 14 of 80 Act, Violence Against Women Act, or a claim under the False Claims Act related to fair housing, non-discrimination, or civil rights generally including an alleged failure to affirmatively further fair housing;
4. Received a letter of findings identifying systemic non-compliance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Section 109 of the Housing and Community Development Act of 1974; Violence Against Women Act; or the Americans with Disabilities Act; or
5. Received a cause determination from a substantially equivalent state or local fair housing agency concerning a systemic violation of provisions of a state or local law prohibiting discrimination in housing based on sexual orientation, gender identity, or lawful source of income.

The City of Phoenix has faced, and still faces, lawsuits by individuals alleging violations of their civil rights, but no judgments have been entered against the City for a pattern or practice or systemic violation of civil rights laws. For the record, the U.S. Department of Justice is currently undertaking an investigation of the Phoenix Police Department. This investigation is in the fact-finding phase, and no conclusions have been drawn as of the submission date of this application.

### *Timely Submission*

The City of Phoenix has submitted this application by the application deadline.

### *Eligible Applicant*

The City of Phoenix certifies that it meets the Threshold Requirements and Other Submission Requirements outlined in the Notice of Funding Opportunity (NOFO) and is eligible to apply. The City of Phoenix is an eligible applicant designation of "02" (City or township governments.)

City of Phoenix, Arizona

Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Application

*Number of Submissions*

The City of Phoenix has submitted only one application for the PRICE funding opportunity.

*Standard Application, Assurances, Certifications, and Disclosures*

The City has completed and/or attached to this application the following required forms/assurances:

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

*Code of Conduct*

The City of Phoenix has included, in the Attachments to this application, its written code of conduct/Ethics Handbook that complies with the requirements included in the “Conducting Business in Accordance with Ethical Standards” section of the Administrative, National and Department Policy Requirements and Terms for HUD Financial Assistance Awards, as well as any program-specific requirements.

*Other Program-Specific Requirements*

During the application process the City of Phoenix:

- Proposed an activity that is consistent with Affirmatively Furthering Fair Housing, the Fair Housing Act, and the City of Phoenix Analysis of Impediments to Fair Housing Choice
- Conducted its planning process in accordance with Limited English Proficiency (LEP) guidance.
- Ensured the in-person public hearing was in a facility that was physically accessible to persons with disabilities.
- Ensured the notices of and communications were provided in a manner that was effective for persons with hearing, visual, and other communication-related disabilities or provided other means of accommodation for persons with disabilities.

If awarded funding, the City of Phoenix will carry out its program in accordance with LEP, physical accessibility, communicate in a manner for persons with hearing, visual, and other communication-related disabilities and provide reasonable accommodations. It will also comply with all applicable environmental requirements related to any awarded funds.



**Exhibit C - Need**

**City of Phoenix**

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

The City of Phoenix is in the grip of a housing crisis. Despite the efforts of the current City initiatives, the creation of affordable housing is failing to keep pace with the demand spurred by a growing population, escalating rent and ownership housing costs, and a distressing surge in eviction rates. Phoenix, the fifth most populous city in the United States, spans 518 square miles and has witnessed the most rapid growth of any major city, with an estimated July 2022 population exceeding 1.6 million people. In 2020, Phoenix was ranked as the nation’s fastest-growing large city for the fifth consecutive year, according to U.S. Bureau’s estimates. The data unequivocally reveals Phoenix's need for affordable housing, and many Manufactured Housing households that meet the criteria could significantly benefit from the PRICE grant activities.

Phoenix hosts approximately 400+ MHCs, inclusive of over 19,000 mobile home units, with a significant portion of these communities serving low-income, under-resourced populations majorly composed of non-white populations. Phoenix, as per the 2020 census, is a vibrant tapestry of diversity, with 42% White, 42% Hispanic, 7% Black, 4% Asian, and 3.5% Mixed. This rich mix of cultures and backgrounds underscores the need for inclusive and equitable housing solutions. Alarmingly, 19.9% of the population, including 19% of children under 18 and seniors 65+, are living below the poverty line, further underscoring the urgency of the affordable housing crisis.

*Poverty Rates*

Phoenix’s remarkable growth has come at a cost. Recent years have seen a surge in housing prices, eviction rates, and homelessness in the area.

<b>INCOME<sup>1</sup> AND HOUSING PROFILE - CITY OF PHOENIX</b>	
<i>Median Area Income</i>	<i># Households</i>
Households earning less than 30% Area Median Income	76,870
Households earning 30% -50% Area Median Income	72,490
Households earning 50% - 80% Area Median Income	115,900
<i>Total Households Low- to Moderate- Income</i>	<i>183,050</i>
<i>Housing Problems and High-Cost Burden</i>	<i># Households</i>
At least one of four housing problems	205,365
At least one of four SEVERE housing problems	114,130
High Cost Burden - Renters/Owners paying <u>30 – 50%</u> of monthly income on housing expenses	99,180
High Cost Burden – Renters/Owners paying <u>more than 50%</u> of monthly income on housing expenses	79,565
Total Households City of Phoenix	580,835

<sup>1</sup> U.S. Census Bureau. (2022). American Community Survey 5-year estimates: 2016-2020.

City of Phoenix, Arizona  
 Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Application

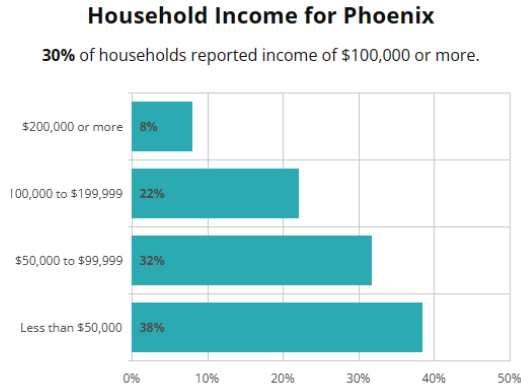


Figure 1: Household Income for Phoenix Households Source: Maricopa Association of Governments. <https://azmag.gov/Programs/Maps-and-Data/Community-Profiles>

Phoenix has experienced extreme rent and home purchase increases since 2020. This data is captured at the local level, and the Census-level data from 2020 has not yet caught up to reflect recent trends in housing pricing. Figure 2 below illustrates the steeply climbing median home sales price, and Figure 3 highlights that the availability of apartment units with rental rates under \$1,000 has decreased by a staggering 83% since 2020.

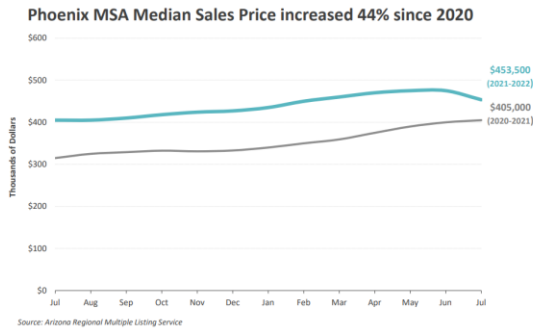


Figure 2: Phoenix MSA Median Sales Prices 2020-2022 Source: Maricopa Association of Governments. Demographic and Housing Trends. September 27, 2022.

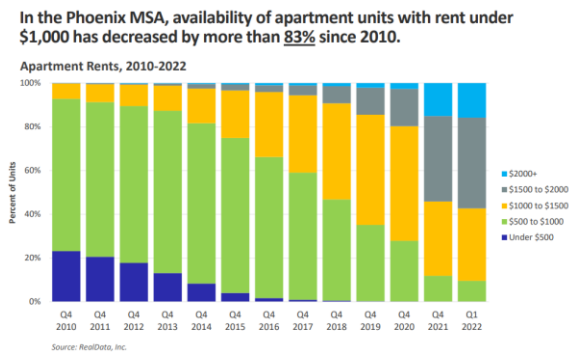


Figure 3: Phoenix MSA Availability of Rent Under \$1,000 Source: Maricopa Association of Governments. Demographic and Housing Trends. September 27, 2022.

## City of Phoenix, Arizona

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

#### *Demographic Makeup and Economic Challenges*

According to the U.S. Census and a Lincoln Land Institute's presentation on manufactured housing, Phoenix's MHCs house nearly 19,000 manufactured home units, 3% of the housing stock of Phoenix and over 400 manufactured home communities, where the Manufactured Housing to subsidized housing ratio stands at 6:4:1—a figure significantly higher than in other states. Approximately 62% of Manufactured Housing in Arizona is affordable compared to only 32% of all housing statewide. Notably, 48% of manufactured housing residents in Arizona are seniors over the age of 65, and the median income of these homeowners is \$39,690, well below the \$72,092 median for all homeowners. The low-income threshold for a family of three in Phoenix is \$55,550, placing many MHC residents below or near this economic benchmark.

#### *Unmet Housing Needs*

In Phoenix, as in the surrounding communities, there is a shortage of rental housing that is both affordable and available to extremely low-income households (with incomes at or below 30% AMI). According to the National Low Income Housing Coalition's Report, The Gap, in 2024, within Maricopa County alone, there were 110,775 extremely low-income renter households and only 20,719 affordable and available rental homes, which is down from the 23,252 rental homes reported in the 2019 The Gap report. There are reportedly only 34 rental homes that are affordable and available in Maricopa County to every 100 households at or below 50% AMI. This is a deficit of 128,908 rental units for the county.

#### *Unmet Homeless Needs*

The number of people experiencing homelessness is directly related to the lack of affordable housing and rising rental rates for people with low incomes. 4,076 persons were experiencing unsheltered homelessness on a given night in all of Maricopa County, AZ in 2024 as identified by the Point-in-Time Count, 2,701 of those in the City of Phoenix alone. It should be noted that many more people experience homelessness throughout the year than during any one given night. Manufactured housing, often a source of Naturally Occurring Affordable Housing (NOAH), faces increasing costs and rising rents. This, coupled with redevelopment pressures, significantly elevates the risk of existing residents becoming homeless as affordable housing options diminish and financial strains grow.

According to the needs assessment performed by the Maricopa Association of Governments (MAG) titled Pathways Home: A Regional Homelessness Action Plan for Local and Tribal Governments, the percentage of homelessness grew faster in Arizona than anywhere else in the country in 2021. One of the main three steps to reducing homelessness by 25% by 2027 is increasing safe, affordable housing options. To meet the needs of these unsheltered people experiencing homelessness, new temporary and permanent housing units will need to be created to reduce homelessness by 25%. The Pathways Home Plan identified the following gaps in increasing safe housing options as necessary to meet the growing needs of the homeless population in the region by 2027:

- Add 770 units of temporary housing.
- Add 1,125 units of permanent housing (rapid re-housing and permanent supportive housing).  
MAG recommends expanding and creating permanent housing projects with supportive

## City of Phoenix, Arizona

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

services strategically spread throughout the region where gaps exist. Offering a range of housing options will contribute to the region's balanced housing portfolio.

- Increase access to and maintain existing rental units. MAG recommends supporting existing efforts and launching additional efforts to increase the number of landlords renting to people experiencing homelessness.

#### *City of Phoenix Manufactured Housing Communities*

The City of Phoenix is addressing an urgent need for affordable and accessible housing within its numerous Manufactured Housing Communities (MHCs). Currently, Phoenix estimates approximately 400+ MHCs, with a significant portion of these communities serving low-income, under-resourced populations predominantly composed of non-white, Indigenous, and people of color. These communities also have a high representation of seniors, veterans, and individuals living with disabilities, who are disproportionately affected by Phoenix's extreme weather conditions, including intense heat and flooding.

Phoenix's MHCs are located throughout the city, with many prominently situated in over 20 census tracts, each housing at least five MHCs, forming dense, affordable housing hubs. These tracts are characterized by lower income levels, with significant portions of their populations living below the poverty line. Specifically, the aggregated data from these tracts show a high percentage of households earning less than \$35,000 annually (approximately 34.7%), starkly contrasting with the city's median household income of \$48,760. These areas also experience high racial and ethnic diversity, with notable percentages of Hispanic or Latino (69.5%), Black or African American (3.1%), and other minority groups, which aligns with the broader demographic trends of Phoenix.

Eight of the twenty census tracts are in a flood plain, all in FEMA-designated areas of extreme heat and high wind risks.

The residents of these tracts, particularly within MHCs, face compounded vulnerabilities. The prevalence of low incomes and demographic makeup suggests a higher risk of housing instability and economic hardship. Notably, the percentage of individuals below the poverty line in these tracts is 26.4%, nearly double the national average. These factors are crucial in understanding the acute need to preserve the affordability and accessibility of housing in these communities.

The concentration of MHCs in these lower-income, high-poverty tracts underscores their role as bastions of affordable housing. However, this concentration also highlights the vulnerability of these communities to socioeconomic shifts, potential redevelopment pressures, and escalating living costs. With the city's overall population growth and the increasing strain on housing affordability, these MHCs are at a heightened risk of displacement or conversion to higher-cost housing options, which would exacerbate the existing challenges their residents face.

#### *Housing Affordability Crisis and MHCs at Risk*

The median rent in Phoenix has soared to \$2,095 (Zillow rental data 5/2024). In contrast, the median lot rental in MHCs remains comparatively lower at \$552, indicating the crucial role of MHCs in providing affordable housing options. Despite their affordability, MHCs face

## City of Phoenix, Arizona

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

continuous threats of conversion to market-rate housing or non-residential uses. Recent years have seen significant redevelopment, with notable instances in 2022-23, including the displacement of hundreds from communities such as Periwinkle, Weldon Court, and Las Casitas. The redevelopment of these three manufactured housing communities underscores the fragile stability of naturally occurring affordable housing stock within the city.

For the residents of these three MHCs, relocating their homes proved challenging due to the age of the units. Although the state offered \$5,000-\$8,000 to those unable to move their homes, this assistance fell short of securing affordable living alternatives for most families. For those eligible to relocate their homes, incentives ranged from \$12,500 to \$20,000, but the scarcity of available lots in other MHCs often rendered this option impractical. In response, the City of Phoenix enhanced support by providing additional funding, housing vouchers, housing assistance, and comprehensive case management.

#### **Is your project within or does it include any communities that meet distress criteria?**

While the City of Phoenix is not within a FEMA-designated Community Disaster Resilience Zone, the city's FEMA National Risk Index score is of significant concern.

With a Risk Index score of 97.33%, placing it in the 97th percentile nationally, Phoenix is categorized at relatively high risk compared to other U.S. locations. This high percentile ranking indicates that Phoenix's exposure to natural disasters, social vulnerabilities, and challenges to community resilience requires urgent attention and strategic planning.

#### *Breakdown of Risk Factors*

##### **1. Natural Hazards:**

- **Heat Waves:** Phoenix scores an alarming 99.8, indicating a very high risk. This is not surprising given Phoenix's desert climate, which results in extremely high temperatures during the summer months.
- **Wildfires:** With a score of 99.7, the risk is also categorized as relatively high, driven by the area's dry conditions and frequent droughts.
- **Strong Winds and Hail:** Scores of 98.9 and 99.3, respectively, place these hazards in the relatively high-risk category, which can significantly impact infrastructure and personal property.
- **Earthquake and Lightning:** Both hazards are scored above 98, suggesting moderate to high risk levels. Lightning strikes are frequent during monsoon season.
- **Flooding:** With a score of 94.5, the risk is moderate. However, flash flooding is a serious concern given Phoenix's variable terrain and occasional heavy rainfalls.

##### **2. Social Vulnerability:**

Phoenix's relatively high social vulnerability score indicates that a significant portion of the population may lack the resources to adequately prepare for, respond to, or recover from natural disasters. Factors contributing to this vulnerability include economic disparities, age demographics (particularly a higher proportion of seniors), and healthcare accessibility challenges.

### 3. Community Resilience:

Phoenix's resilience score is relatively low, reflecting challenges in the community's capacity to recover from disasters. This includes limitations in infrastructure robustness, emergency preparedness, and the availability of resources necessary to rebound from adverse events.

#### *Implications for Phoenix's Housing and Infrastructure*

The FEMA National Risk Index underscores the need for Phoenix to integrate disaster risk reduction into urban planning and housing policies, especially considering the expected annual loss and the existing vulnerabilities:

- **Infrastructure Enhancement:** Developing essential infrastructure such as roads, sidewalks, and utility systems, including environmentally sustainable options like solar arrays and electric vehicle hookups. These upgrades ensure long-term sustainability and resilience against environmental stresses.
- **Health and Safety:** Prioritizing the structural soundness of homes through the Weatherization Assistance Program (WAP) and upgrading HVAC systems to mitigate extreme temperatures. This includes rehabilitating homes to improve physical accessibility and replacing pre-1976 units to meet modern safety standards, enhancing the community's ability to withstand environmental hazards.
- **Community and Accessibility Improvements:** Enhancing recreational and service areas to foster community cohesion and ensure inclusivity, particularly for residents with disabilities. These spaces are vital for community well-being and emergency preparedness.

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

While no Manufactured Housing Communities (MHCs) within the City of Phoenix are located directly within Low-Income Community Opportunity Zones, several of these communities are situated in census tracts identified by the Community Development Financial Institutions (CDFI) as meeting poverty rate qualifications. Specifically, there are more than 20 such census tracts across the city that meet the distress criteria as defined in 12 CFR 1805.201(b)(3)(ii)(D), which include indicators of high rates of poverty, low income, high unemployment, and population loss.

These census tracts, characterized by significant socioeconomic challenges, are home to multiple MHCs housing thousands of Phoenix's most vulnerable populations. The high rates of poverty and low-income levels in these areas directly impact the availability and condition of housing, making it challenging to maintain or upgrade living conditions without external assistance. For many residents, the economic strain limits their ability to afford repairs or move to higher-quality housing, leading to poverty and housing instability.

The presence of MHCs in these distressed areas underscores the critical need for targeted interventions to preserve and improve housing quality. Focusing on these communities, our project aims to address and mitigate the issues arising from the distress criteria. Through the proposed interventions, we strive to enhance the infrastructure of these MHCs, improve living conditions, and provide comprehensive support services to the residents.

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

For the City of Phoenix, several significant barriers exist that impede the preservation and revitalization of Manufactured Housing Communities (MHCs), especially within the context of rising land values and urban development pressures.

1. **Skyrocketing Land Prices and Development Pressure:** With Phoenix's growing population and increasing land prices, MHCs are becoming attractive targets for developers interested in more lucrative residential or commercial projects, as they are already zoned for high-density usage. This trend puts existing MHCs at risk of being bought out and redeveloped, exacerbating residents' displacement. In 2023 alone, three communities faced redevelopment, and several others were listed for sale, highlighting the urgency of this issue.
2. **Perceptions of Manufactured Housing:** Prevalent biases and misconceptions about the quality and livability of manufactured homes hinder their integration into urban infill and redevelopment projects. These perceptions affect the willingness of communities and local governments to support and invest in MHCs.
3. **Financing Challenges:** Manufactured homes are often financed as personal property (chattel) rather than real estate, subjecting buyers to higher interest rates and shorter loan terms than traditional mortgages. This financing structure makes it difficult for low-income, entry-level homebuyers to afford a manufactured home, limiting their access to affordable homeownership.
4. **Limited Availability of Affordable Land:** There is a scarcity of large plots of available land within the urban area, and a shortage of affordable land for manufactured housing. Although recent updates have allowed for smaller lot sizes and the possibility of developing tiny home communities, these changes are insufficient to address the needs for new manufactured home communities (MHCs). This shortage is compounded by the high demand and nearly total capacity of existing MHCs, restricting the placement of new units and the expansion of existing communities.
5. **Organizational and Governance Challenges Among Residents:** Many MHC residents have limited capacity for self-governance and organizing, which hinders their ability to form resident associations or cooperatives.
6. **Protected Class Challenges:** The primary residents affected by these barriers include low-income individuals, mainly from non-white communities, as well as seniors and veterans. These groups often face hurdles such as technology gaps, language barriers, and systemic obstacles like historic segregation and discrimination that limit their housing options and exacerbate their vulnerability to displacement.



**Exhibit D - Soundness of Approach**

**City of Phoenix**

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

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

#### *Vision*

The City of Phoenix envisions a future where Manufactured Housing Communities (MHCs) are revitalized and preserved as fundamental affordable housing solutions for low- and moderate-income households. The vast expanse of Phoenix is home to approximately 400 MHCs, crucial for the housing security of a diverse population, particularly those from under-resourced non-white, Indigenous, and people of color communities.

Phoenix's goals are to foster community stability and empowerment by enhancing the resiliency, safety, and affordability of manufactured homes.

#### *Goals*

1. **Revitalization:** We plan to collaborate with landowners to bring MHC properties up to code and support residents with necessary repairs or replacements of their units, securing long-term affordability through deed restrictions.
2. **Preservation:** Initiatives will be launched to facilitate the formation of resident-owned communities (ROCs). This approach preserves housing and empowers residents by allowing them to control their living environments, reducing the risk of displacement.
3. **Resident Support:** Enhanced case management, education and navigation services will assist residents at risk of displacement, particularly those from communities recently sold or threatened with redevelopment. This support is crucial in maintaining community stability and preventing homelessness.

Through these targeted interventions, the City of Phoenix aims to protect and enhance its Naturally Occurring Affordable Housing (NOAH) stock, particularly within MHCs, as part of a broader commitment to preserving affordable housing and increasing community resilience against natural disasters.

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

To address the needs outlined in Factor (a), the City of Phoenix will focus on:

- **Manufactured Home Upgrades:** Implement a city-wide initiative to retrofit and repair manufactured homes, focusing on critical areas such as roofing, HVAC systems, climate resilience, and weatherproofing.
- **Community Conversion Projects:** Explore partnerships with non-profit partners like ROC USA to identify and transition eligible MHCs into Resident-Owned Communities (ROC's), ensuring that residents are actively involved in their communities' governance and operation.
- **Infrastructure Improvement Initiatives:** Execute a series of infrastructure upgrades within MHCs to enhance residents' safety and quality of life. These projects will include improvements to electrical systems, flood management, and communal spaces.

City of Phoenix, Arizona  
Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Application

*Innovation and Added Benefit*

Our approach is innovative in its strategy to enhance the physical structures of MHCs and revolutionize governance models by transitioning to ROCs wherever feasible. This model preserves housing, improves community cohesion, and empowers residents. Focusing on resident ownership and participatory governance models represents a transformative step forward in affordable housing, ensuring long-term sustainability and resilience for these communities.

*Insights from Past Engagements*

In the City of Phoenix, residents of mobile home communities have increasingly faced the threat of displacement due to redevelopment. Following consultations with the Mayor and City Council, an internal work group was established on September 28, 2022, to explore how the city could assist families facing imminent displacement and devise strategies to mitigate such risks in the future. The group's findings, detailed in a research report first issued on November 25, 2022, with a subsequent update on February 23, 2023, have been instrumental in shaping the programs proposed in our grant.

In 2022, over 165 households from three mobile home communities within the City of Phoenix faced displacement due to private acquisition and redevelopment plans. In response, the City Manager formed a task force to determine how the city could assist these families. The team evaluated legal and financial assistance options and provided immediate solutions, such as housing navigation, case management, housing vouchers, and rent and utility assistance.

In 2023, the Mobile Home Resident Relocation Team engaged impacted residents in partnership with the Phoenix IDA, Trellis, and Helping Families in Need. This team collaborated with City executives from various departments and provided comprehensive support to displaced residents. By November 2023, over 160 residents had secured permanent housing, with two remaining residents finalizing permanent housing. Thanks to the concerted efforts of over 45 Human Services Department caseworkers and supervisors, all impacted households avoided homelessness.

These experiences have underscored the critical need for the services we propose, ensuring that the lessons learned from past engagements directly inform and enhance our current and future initiatives. By leveraging these insights, we aim to promote fair housing and ensure equitable treatment for all community members.

*Compliance and Eligibility*

The proposed activities align with the National Objectives for benefiting Low-Moderate Income (LMI) individuals by directly addressing their housing needs within the scope of eligible activities under the PRICE guidelines. These activities include development-related hard costs, ensuring that all interventions are directly linked to improving housing outcomes for LMI populations.

*Geographic and Community Connection*

## City of Phoenix, Arizona

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

The project will encompass multiple MHC sites across Phoenix, specifically targeting areas with high social vulnerability and low community resilience. These sites will enhance access to community amenities and essential services, further supporting residents' overall well-being.

#### Program Design

The City of Phoenix's PRICE Main grant application encompasses a multi-faceted approach that integrates activities across three central City departments—Housing, Human Services, and Neighborhood Services—to effectively manage and deliver comprehensive solutions.

The program's core is the MHC Acquisition Program, which aims to transition MHCs to Resident-Owned Communities (ROCs) wherever feasible. This initiative stabilizes housing by preventing displacement due to land sale or redevelopment and empowers residents to own the land under their homes. Given the critical role of manufactured homes in providing affordable housing options and residents' vulnerability to fluctuations in land rent and redevelopment risks, this approach directly addresses the primary needs for security and affordability.

#### **Housing Department**

The Housing Department will lead the acquisition and conversions of MHCs. The activities include:

- Financial assistance to acquire MHCs to be managed as ROCs, enhancing community stability and resident control.
- Supporting homeownership through land and site acquisition assistance for manufactured housing renters aiming to transition from renters to homeowners.

#### *Eligibility and Use of Funds:*

- Applicants must be within Phoenix city limits and can include resident organizations or qualified non-profit housing sponsors.
- All participating organizations must demonstrate the capability to manage and sustain the operational demands of an ROC.
- Funds are allocated for project costs, including purchase prices, associated professional fees, and necessary infrastructural improvements.
- Financial assistance will range from 50% to 95% of approved project costs, with long-term, low-interest, or forgivable loan terms to ensure continued affordability through a minimum 15-year deed restriction. Funding priority will be given to resident organizations.

#### **Human Services Department**

The Human Services Department (HSD) of Phoenix is dedicated to enhancing the stability and quality of life for residents within Manufactured Housing Communities (MHCs) through various critical resident services. Based on insights from past engagements and experiences with resident displacement, HSD has identified and prioritized essential services to meet the immediate and long-term needs of MHC residents.

City of Phoenix, Arizona  
Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Application

*Resident Services:*

HSD will implement comprehensive programs to support both new and existing MHC residents by providing essential services that include:

*Relocation Assistance:*

HSD will offer relocation assistance to residents displaced from MHCs, ensuring they receive both advisory and financial support. This assistance encompasses:

- Providing relocation advisory services tailored to individual needs.
- Offering temporary and permanent relocation assistance to facilitate smooth transitions.
- Covering applicable costs as required under federal regulations such as 49 CFR part 24 and 24 CFR parts 570.606 and 42, ensuring the move does not financially burden residents.

*Housing Mobility and Stability Services:*

- Housing Mobility Counseling to assist residents in navigating the complexities of the housing market, empowering them with the knowledge to make informed decisions about their housing options.
- Eviction Prevention Assistance to prevent the destabilizing effects of eviction, this program will provide:
- Legal and housing counseling to educate residents on their rights and their protections.
- Assistance with rental arrears where appropriate, helping residents to maintain their current housing.
- Support understanding of local ordinances that protect renters and homesite renters from eviction in addition to landlord and property owner education.

*Goals and Implementation:*

These services address immediate needs and ensure long-term housing stability for MHC residents. By empowering residents through education and direct support, HSD aims to strengthen neighborhood ties and build a more resilient community.

The Human Services Department's strategic focus ensures that essential support mechanisms are in place, significantly impacting the lives of MHC residents by enhancing their ability to secure and maintain stable, affordable housing.

**Neighborhood Services Department**

The Neighborhood Services Department (NSD) is dedicated to preserving homes and promoting sustainable communities. It will lead the rehabilitation or replacement of manufactured homes and the revitalization of MHCs through the following activities:

*MH Rehabilitation or Replacement:*

City of Phoenix, Arizona  
Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Application

- Rehabilitation of MHs, prioritizing health and safety with a particular emphasis on structural soundness, access to utilities, and mitigating extreme temperatures through HVAC and Weatherization Assistance Program (WAP) activities.
- Financial assistance for the replacement of MH units where rehabilitation is not viable due to cost and/or condition, and pre-1976 homes, which are eligible only for replacement to ensure compliance with modern safety and efficiency standards.
- Implementation of ADA and disability modifications to enhance accessibility and livability.

*Eligibility and Use of Funds:*

- Applicants must reside within Phoenix city limits
- All activity must support the Community Development Block Grant (CDBG) national objective of benefitting LMI individuals or households
- Rehabilitation activities will be capped at 75% of the value of the unit
- Replacement assistance will be based on need and capped at 75% of the value of the unit.
- Minimum of 15-year forgivable liens/deed restrictions on rehabilitation projects and a minimum of 20-year forgivable liens/deed restrictions for replacement projects to ensure affordability.
- Funding priority will be given to applicants residing in ROCs or MHCs approved for infrastructure and enhancement activities.

*MHC Infrastructure and Enhancement:*

- Development or improvement of essential infrastructure supporting MHCs, including roads, sidewalks, foundational supports, water and wastewater infrastructure, and utility hookups such as electricity and broadband internet.
- Installation of environmentally sustainable options like electric vehicle (EV) hookups or solar arrays and improving community-accessible recreation or service areas.

*Eligibility and Use of Funds:*

- MHC must be located within Phoenix city limits
- Must demonstrate at least 51% of residents are LMI and meet established underwriting criteria.
- Financial assistance for infrastructure and enhancement activities may cover up to 95% of approved project costs, with long-term, low-interest, or forgivable loan terms to ensure continued affordability through a minimum 30-year deed restriction.
- Funding priority will be given to resident owned MHCs.

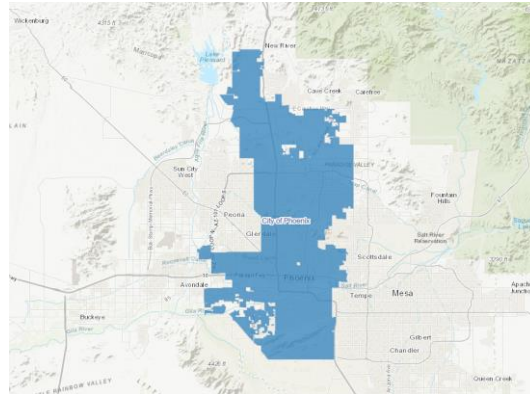
*Comprehensive Improvements:*

Beyond individual improvements, NSD initiatives may encompass extensive community upgrades to utility and public facilities, including enhancing flood and drainage systems, creating fire breaks by reducing deadfall and brush, and enhancing community open space. These efforts are integral to bolstering the resilience of MHCs against natural hazards and extreme weather events, further ensuring these communities' long-term viability and sustainability.

City of Phoenix, Arizona  
 Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Application

**Geographic Scope**

Our geographic scope encompasses the entire City of Phoenix, which spans 518 square miles and is home to over 1.64 million residents. Phoenix is a vibrant, racially diverse city with about 253,000 of its residents, or 15.4%, living in poverty. Manufactured Housing Communities (MHCs) are distributed throughout Phoenix, and to ensure we address the needs across all neighborhoods, we will keep the geographic scope for eligible projects open to any location within city limits. This approach allows us to accept applications for projects anywhere within Phoenix. *Figure 4 illustrates the Phoenix city limits.*



*Figure 1: City of Phoenix City Limits Map*

*Source: City of Phoenix Maps and Geographic Information Systems (GIS) Data.  
<https://www.phoenix.gov/imap>*

**2What is your timeline and key tasks along that timeline?**

***Timeline***

<b>PRICE Grant Program</b>	
<b>Design and Implementation Timeline</b>	
<b>Activity</b>	<b>Estimated Date</b>
Project Award	October 2024
Stakeholder Engagement on Program Design (Approx. 3-4 Months)	October 2024 – February 2025
Monthly Program Team Meetings to Coordinate Processes during Initial Launch and Implementation Phase	October 2024 – September 2026
<i><u>Phase I: Resident Assistance</u></i>	
Phase I Develop Program Application, Policies, and Procedures (Approx. 3 Months)	February 2025 – May 2025
Phase I Procurement of Non-Profit/Partner (Approx. 9 Months)	May 2025 – January 2026

City of Phoenix, Arizona  
 Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Application

Phase I Begin Hiring Process - Staffing Contracts for Program Execution	May 2025
Phase I Create Program Website and Communication Tools	January 2026
Phase I Program Launch	February 2026
Phase I Rolling Applications Accepted on and Approved on First-Come First-Served Basis	February 2026 – July 2030
Design Program Monitoring Guidelines, Begin Monitoring of Approved Projects	February 2026
Quarterly Program Team Meetings to ensure regular communication during implementation	March 2026 – July 2030
<i><u>Phase II: Infrastructure and Enhancement, Rehabilitation Program</u></i>	
Phase II Develop Program Application, Policies, and Procedures (Approx. 5 Months)	September 2025 – January 2026
Phase II Begin Hiring Process - Staffing Contracts for Program Execution	September 2025
Phase II Create Program Website and Communication Tools	January 2026
Phase II Program Launch	February 2026
Phase II Rolling Applications Accepted on and Approved on First-Come First-Served Basis	February 2026 – July 2030
Design Program Monitoring Guidelines, Begin Monitoring of Approved Projects	February 2026
Quarterly Program Team Meetings to ensure regular communication during implementation	March 2026 – July 2030
<i><u>Phase III: Loan/Grant Program for Acquisition</u></i>	
Phase III Community Identification (Approx. 8 Months)	February 2025 – September 2025
Phase III Develop Program Application, Policies, and Procedures (Approx. 6 Months)	October 2025 – March 2026
Phase III Create Program Website and Communication Tools	April 2026
Phase III Program Launch	May 2026
Phase III Rolling Applications Accepted on and Approved on First-Come First-Served Basis	May 2026 – July 2030



City of Phoenix, Arizona  
 Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Application

Design Program Monitoring Guidelines, Begin Monitoring of Approved Projects	June 2026
Quarterly Program Team Meetings to ensure regular communication during implementation	July 2026 – September 2030
<i>Implementation and Monitoring Phase</i>	
Yearly Program Monitoring of Approved Projects	Ongoing
Project Closeout	August – September 2030

**What is your budget?**

*Budget*

The budget for our comprehensive program is strategically designed to support a significant number of households and Manufactured Housing Communities (MHCs) within the City of Phoenix. Our Human Services Department will assist 2,400 households, allocating \$5,000 per unit to enhance resident services and support. In alignment with our goals for physical improvements, Neighborhood Services will facilitate up to 250 MH unit rehabilitations or replacements and up to \$2 million dedicated to essential MHC infrastructure enhancements. Additionally, to foster Resident-Owned Community (ROC) development, an average of \$100,000 - \$160,000 will be invested per homesite, benefiting up to 275 units.

<b>Category</b>	<b>Amount</b>
Program Activities:	
Phase I: Resident Assistance	\$12,000,000
Phase II: Infrastructure and Enhancement, Rehabilitation Program	\$18,000,000
Phase III: Loan/Grant Program for Acquisition	\$37,500,000
Program Administration:	
Not to exceed 10% for salary and indirect costs	\$7,500,000
<b>TOTAL REQUEST</b>	<b>\$75,000,000</b>

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

Our proposal under the PRICE Main grant seeks to significantly enhance the quality and accessibility of affordable housing, increase the resilience of manufactured homes, and improve the overall infrastructure and services of Manufactured Housing Communities (MHCs) within the City of Phoenix. In addition, with this funding, the City of Phoenix will provide

Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Application

comprehensive case management services including relocation assistance and housing mobility and stability services for those at risk of displacement.

*Access to Quality Affordable Housing*

We aim to increase opportunities for low- and moderate-income (LMI) households to access affordable housing by rehabilitating and preserving manufactured homes and MHCs. This effort will focus on extensive repairs, modernizations, and sustainability improvements to extend the usability of these homes and protect their affordability for future generations. These efforts directly support the retention of unsubsidized affordable housing units, providing long-term housing security for current residents and future occupants.

*Enhanced Resilience of Manufactured Homes*

Our project will address the vulnerabilities of manufactured homes to natural hazards—particularly heat waves, flooding, and strong winds—identified as significant risks in our area. We plan to retrofit existing structures with weather-resistant materials, improve insulation and cooling systems to withstand extreme heat, and reinforce anchoring systems to better resist high winds. These enhancements will make homes safer and more energy-efficient, reducing overall living costs for residents.

*Improvements to MHC Infrastructure and Services*

Infrastructure upgrades within MHCs are a **vital** component of our proposal. We plan to overhaul outdated water and sewage systems, improve roadways and communal lighting, and introduce green spaces and **tree-planting** initiatives to combat heat islands and enhance community livability. These infrastructure enhancements will substantially improve the quality of life for residents and contribute to the environmental sustainability of the communities.

*Retention and Increase of Unsubsidized Affordable Housing*

By investing in the rehabilitation and modernization of MHCs and their homes, we directly contribute to the retention and increase of unsubsidized affordable housing options. These efforts will prevent the displacement of existing communities and ensure that these housing options remain affordable and accessible to LMI households.

*Overall Community Benefit*

The comprehensive enhancements planned for manufactured homes and MHCs will benefit the community broadly. Improved housing quality and infrastructure will lead to healthier living environments, greater community cohesion, and increased resident pride. The project will also stimulate local employment through construction and maintenance jobs tied to the rehabilitation efforts.

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

The City of Phoenix promotes long-term affordability and financial security for residents benefiting from the PRICE funding, particularly those within Manufactured Housing

City of Phoenix, Arizona

Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Application

Communities (MHCs). Our approach aims to maintain affordability and enhance homeownership's potential, enabling residents to build wealth and secure their financial future.

**How will you ensure the availability of manufactured housing options to LMI households? What protections will be in place for residents?**

We will align our affordability with existing program requirements to ensure that all assisted units and lots remain affordable for 15-30 years after receiving support. This commitment will be enforced through a Land Use Restriction Agreement (LURA), which will legally guarantee the long-term affordability of these homes.

Recognizing the critical role of land ownership in securing financial stability for manufactured homeowners, our initiatives will include opportunities for lot ownership. Plans for lot ownership include working with residents to establish ROCs wherever possible to enhance individual and community resiliency. This strategy stabilizes housing costs for homeowners and allows them to accumulate equity over time, a fundamental aspect of building wealth.

*Monitoring and Compliance*

Our strategy includes a collaborative monitoring approach between departments to ensure affordability and compliance standards adherence for each program. This partnership aims to reduce the administrative load on our staff and streamline oversight processes.

*Promotion to LMI*

*Households and Protected Classes*

Our project will actively promote affordable homeownership and rental opportunities to low—and moderate-income (LMI) households, focusing on reaching protected classes often underserved in the housing market. This outreach will ensure that sustainable and affordable housing benefits reach those most in need, supporting our broader social equity and inclusion goals.

*Sustainability and Long-Term Affordability*

By securing long-term affordability through legal agreements and fostering opportunities for wealth-building through property ownership, Phoenix has positioned these housing initiatives to be sustainable for decades. The goal is to provide not just housing but a stable foundation that supports the financial well-being of its residents.

Protections for Residents

In alignment with HUD's expectations and to ensure robust protections for the residents of Manufactured Housing Communities (MHCs) benefiting from the PRICE funding, the City of Phoenix is committed to pursuing comprehensive tenant protection measures. These measures safeguard tenants' rights, preserve housing affordability, and promote community stability.

Protection from Adverse Actions

The City of Phoenix will take active steps to provide residents valuable information on lot rent increases, eviction, and other adverse actions by:

## City of Phoenix, Arizona

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

- Resident Rights Information: Actively informing residents of their rights under local, state, and federal laws through community meetings, informational brochures, and dedicated online resources.
- Housing and Legal Counseling: Providing access to housing and legal counseling services to assist residents in understanding their rights and options and advocating when necessary.
- Land Acquisition: Exploring opportunities for land acquisition to control the land under MHCs, thereby securing long-term affordability and community stability.

#### *Compliance with Civil Rights Laws*

All proposed tenant protections and community improvements will comply with the Fair Housing Act and other relevant federal civil rights laws. We will also ensure alignment with applicable state, local, or tribal laws and regulations.

#### Access to Resources and Financing

Our proposal is strategically designed to enhance access to resources and financing for underserved communities within Phoenix, mainly focusing on residents of Manufactured Housing Communities (MHCs) and owners of manufactured homes. These communities often include impoverished individuals, those without personal transportation, and residents of overcrowded homes. To address these challenges, our proposal includes several key initiatives:

#### *Enhanced Access to Housing for Individuals with Disabilities*

We are committed to increasing accessible and affordable housing opportunities for individuals with disabilities. Our approach includes adapting manufactured homes to meet accessibility standards, ensuring that these homes are both physically accessible and equipped with the necessary adaptations to support independent living. This effort will be coordinated through our proposed enhancements to building codes and standards for MHCs, focusing on features that facilitate accessibility, such as ramps, wider doorways, and adapted bathroom fixtures.

#### *Integration of Supportive Services*

To support integrated living and enhance the quality of life for residents, our proposal emphasizes the integration of voluntary supportive services directly within MHCs. Through a close partnership with the City of Phoenix Human Services Department, we will provide comprehensive wraparound case management services. These services will assist residents in connecting with essential resources including health services, transportation, and social supports, which are crucial for promoting independence and integrated living within their communities.

#### *Financial Empowerment and Access to Financing*

A critical aspect of our proposal is to improve access to financial resources for underserved residents. The Human Services Department will be pivotal in connecting MHC residents and manufactured homeowners with financing opportunities offered through the Housing and Neighborhood Services departments as part of this grant. This includes assistance with securing loans for home purchases or improvements, accessing grants for retrofitting homes for accessibility, and providing guidance on land purchases to ensure the long-term stability of their homes.

#### *Creation of Resident-Owned Communities (ROCs)*

City of Phoenix, Arizona

Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Application

Our proposal encourages the formation of ROCs to empower residents further and provide sustainable housing solutions. This initiative will support residents of MHCs in collectively purchasing their communities, thus securing land tenure and promoting community governance.

*Relocation Assistance*

Our proposal ensures that comprehensive relocation assistance is available for residents impacted by redevelopment or those needing to relocate for accessibility reasons. This includes financial aid to cover moving costs, support finding new housing that meets their needs, and continuity of care and service access.

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

**What significant hazards could impact your project site(s)? How will your activities address the current and future threats of natural hazards, extreme weather, and disaster events?**

The City of Phoenix in Maricopa County is susceptible to various environmental hazards, as the FEMA National Risk Index indicates, with concerns for heat waves, strong winds, hail, flooding, and wildfires. Due to the city's extreme temperatures, heat waves are a significant threat, evidenced by a risk score of 99.8. The relentless heat has had devastating impacts on the community. In 2023, Maricopa County recorded 645 heat-related deaths, a 52% increase from the previous year and the most ever documented in Arizona, marking a 1,000 percent increase over ten years. These soaring heat mortalities coincide with record-setting temperatures and increasing eviction rates, leading to a collision of homelessness and extreme heat.

Phoenix's population is booming, making it the second-fastest-growing U.S. city from 2021 to 2022, according to the U.S. Census Bureau. The National Weather Service reported that Phoenix hit 110°F on 54 days in 2023, setting a new heat record. In July alone, there was a 31-day streak of highs at or above 110°F from June 30 to July 30. Additionally, the city's 2023 monsoon season was the driest on record, exacerbating the heat crisis.

The Maricopa County 2023 Heat Related Deaths Report highlights further alarming statistics: 59% of all heat-related deaths were directly caused by heat, and 71% occurred on days when the Weather Service issued an excessive heat warning, a significant increase from the 32% average over the past five years. During July, there was an average of 13 heat-related deaths per day, with daily temperatures not dropping below 91°F from July 10-25. The hottest temperatures of 119°F were recorded on July 19, 20, and 25. Excessive heat warnings were issued for a total of 42 days. Indoor heat injuries were notably high in mobile homes, where the average ambient air temperature during indoor deaths was 102°F.

City of Phoenix, Arizona  
 Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Application

<b><i>Phoenix Statistics</i></b>		
<b><i>2023</i></b>	<b><i>Value</i></b>	<b><i>Rank</i></b>
<b>Avg High</b>	88.8	5th Warmest
<b>Avg Low</b>	65.3	4th Warmest
<b>Avg Temp</b>	77.0	4th Warmest
<b>Rain</b>	4.21	15th Driest

***Phoenix Annual Temperature Rankings (Warmest Years)***

<b><i>Year</i></b>	<b><i>Avg Daily Temp</i></b>	<b><i>Year</i></b>	<b><i>Avg Max Temp</i></b>	<b><i>Year</i></b>	<b><i>Avg Min Temp</i></b>
2017	77.3	1989	89.8	2017	65.4
2020	77.2	2020	89.5	2015	65.4
2014	77.1	2017	89.1	2014	65.4
<b>2023</b>	<b>77.0</b>	2014	88.9	<b>2023</b>	<b>65.3</b>
1989	76.9	<b>2023</b>	<b>88.8</b>	2016	65.0
2016	76.7	2012	88.7	2020	64.9
2015	76.7	2016	88.5	2003	64.9
2012	76.7	1934	88.3	2007	64.8
2018	76.4	2021	88.2	2018	64.7
2007	76.4	2018	88.1	2012	64.7

To combat this, our initiatives will focus on installing energy-efficient roofing and cooling systems, enhancing shading with tree planting and covered areas, and using reflective materials to decrease heat absorption.

Additionally, strong winds and hail, with risk scores of 98.9 and 99.3, respectively, will be addressed by reinforcing home anchoring systems and using durable, hail-resistant materials for construction. For flooding, which holds a risk score of 94.5, improvements in drainage systems and elevating infrastructure will mitigate water-related damages, particularly during monsoon season. Additional monsoon prevention includes cleaning out roof drains and scuppers, thinning trees and vegetation, and cleaning out dry wells for water to collect.

The Flood Control District of Maricopa County is currently conducting a Flood Hazard Study covering approximately 90 square miles of Metro Phoenix to further assess flooding and drainage problems, and to determine if there are updates needed to the FEMA Special Flood Hazard Areas. This plan will influence decisions for geographical flooding needs to provide potential solutions in flood prone areas.

## Metro Phoenix ADMP STUDY AREA BOUNDARY



Wildfire risks, scored at 99.7, necessitate creating defensible spaces, applying fire-resistant materials, and robust community education on fire safety and emergency evacuations.

Overall resilience will be bolstered by developing comprehensive emergency preparedness and response plans, incorporating hazard mitigation into maintenance routines, and fostering collaboration with local emergency services to enhance disaster readiness and recovery efforts.

The *2021 Maricopa County Manufactured and RV Homes: Raising Awareness about Extreme Heat, Safety Tips, and Available Community Resources* report underlines residents' severe challenges in manufactured and RV homes during extreme heat, guiding our protective measures to adapt to escalating temperatures and evolving climate conditions.

The Neighborhood Services activities conducted through this grant funding will address these environmental concerns and build the resilience of the Manufactured Housing communities.

*Key Findings of the Report:*

The report highlights that many heat-related deaths and injuries occur within manufactured and RV home communities. In fact, 30% of indoor heat deaths occur in these settings, underscoring the acute risk residents face due to inadequate cooling systems and the heat-retentive nature of manufactured housing materials.

Initiated in 2020, the awareness campaign included distributing Heat Toolkits that contained crucial information on heat illness prevention, safety tips, and local community resources. Despite these efforts, the survey results indicated that while most residents (92%) recognized their risk of heat-related illnesses, a majority (89%) did not take action when feeling ill, primarily due to lack of health insurance and financial constraints impacting their ability to cool their homes effectively.

The report's economic analysis showed that electricity costs significantly restrict air conditioning use in these homes. 69% of residents limit their AC use due to high energy costs, which is particularly concerning given that 97% cite cost as the primary reason for restricted use.

Although more than half of the survey respondents knew of utility bill assistance and cooling system repair programs, very few had utilized these services. Barriers to accessing these programs included a lack of detailed contact information, assumptions of ineligibility, perceived complexity of the application processes, and lack of internet access.

The report concluded with a call for more robust community engagement and detailed suggestions from residents on improving access to cooling system repairs and medical services. Notably, almost all residents who received the Heat Toolkit found it helpful, indicating a strong community desire for continued education and support services.

These findings from the 2021 Maricopa County report illustrate the critical need for targeted interventions to enhance the resilience of manufactured and RV home communities against extreme heat. They also underscore the importance of continued outreach and improved accessibility to assistance programs that can help mitigate the health and economic impacts of rising temperatures.

Current and Future Threats

To address the current and future threats of natural hazards, extreme weather, and disaster events in Phoenix, our project aims to enhance the safety and stability of manufactured housing significantly. This commitment focuses on immediate mitigations and long-term resilience strategies to protect low- and moderate-income (LMI) households, particularly vulnerable due to economic constraints and limited disaster preparedness and recovery resources.



### **Mitigation Strategies for Weather-Related Hazards**

Our projects will address multiple weather-related hazards through programmatic development and specific requirements to reduce these risks. For wildfires and extreme heat, we will use fire-resistant materials to renovate manufactured homes, alongside installing energy-efficient cooling systems and reflective roofing. Strategic tree planting will further mitigate heat impacts.

Enhancing site pads within Manufactured Housing Communities (MHCs) will help address flooding risks for residents while promoting water runoff. We will seek to strengthen homes with stronger building materials, anchoring systems, and impact-resistant, energy-efficient windows to counter strong desert winds.

Support for Low and Moderate-Income (LMI) households will focus on building resilience through infrastructure upgrades, such as reinforced community centers and improved access to communication systems. We will also facilitate access to disaster recovery financial assistance as needed.

Material choices will be climate-appropriate, including heat-reflective paint and moisture-resistant flooring, while promoting sustainability with environmentally friendly materials.

We will also conduct detailed risk analyses for homes that have experienced repetitive loss and implement targeted mitigation strategies to manage and reduce future risks. This comprehensive approach ensures the safety and sustainability of our communities against various environmental challenges.

### **How does your proposal address Environmental Justice (as defined in section I.A.4 of this NOFO)?**

Our proposal for the PRICE grant is deeply committed to advancing Environmental Justice by specifically targeting manufactured housing communities and individual homeowners, who are often part of underserved and overburdened populations in Phoenix/Maricopa County. Through a series of targeted interventions, this proposal aims to significantly enhance the living conditions in these communities, directly addressing the disparities outlined by the Climate and Economic Justice Screening Tool.

#### Reducing Exposure to Environmental and Health Hazards

- **Heat Mitigation:** Installation of energy-efficient roofing and air conditioning systems will be prioritized to combat the extreme heat prevalent in Phoenix. This will directly address the high energy costs that disproportionately affect low-income residents. These improvements are crucial as our area ranks in the 94th percentile for the burden of average annual energy costs relative to household income.
- **Pollution Mitigation:** With the proximity to hazardous waste facilities ranking in the 93rd percentile, our project will implement green buffer zones around manufactured housing communities where possible. These zones will contain vegetation barriers that help filter air pollutants and reduce residents' exposure to harmful substances.

#### Improving Protection and Resilience to Environmental Harms

City of Phoenix, Arizona  
Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Application

- **Weatherization and Fire-Resistance:** Incorporating weather-resistant building materials and fire-resistant construction will be central to our efforts. This initiative will protect homes from wildfires and extreme weather events, directly improving the resilience of historically vulnerable homes.
- **Floodproofing:** Enhancing drainage systems and implementing flood barriers will protect these communities from flooding, a crucial intervention given the projected risk increase due to climate change.

Expanding Environmental Benefits

- **Green Technology:** Assistance with the installation of solar panels in community areas will reduce dependency on the traditional energy grid and lower energy costs, promoting clean energy use among the most vulnerable populations.
- **Public Health and Recreation:** Promoting the development of community gardens and recreational spaces will enhance biodiversity and provide safe, accessible areas for physical activity, addressing health disparities like diabetes and heart disease that are prevalent in these communities.

Overcoming Prior Disinvestment in Environmental Infrastructure

- **Green Spaces and Pollution Control:** Our proposal aims to reverse the effects of historical disinvestment in environmental infrastructure by investing in green spaces and advanced pollution control measures. This will provide residents with improved air and water quality and more livable community spaces.
- **Community Engagement and Education:** We plan to provide residents with information on environmental stewardship programs, educating them on sustainable practices and involving them in the upkeep and enhancement of their surroundings.

This proposal aligns closely with Environmental Justice goals by ensuring that interventions mitigate current disparities and build long-term sustainability and resilience in communities facing systematic neglect. Through these concerted efforts, we aim to advance a more equitable environmental future for Phoenix's most vulnerable populations, directly addressing the factors highlighted by the Climate and Economic Justice Screening Tool and ensuring compliance with all relevant federal, state, and local regulations.

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

To ensure diverse stakeholder participation in the PRICE Main program, we will adopt a comprehensive and inclusive approach that prioritizes engagement with all community segments impacted by our activities. This will include groups such as, but not limited to: manufactured housing community residents, local government agencies, non-profits, Community Development Financial Institutions (CDFIs), cooperatives, tenant advocates, fair housing organizations, developers, builders, general contractors, and unions.

*Engagement Strategies:*

We will develop and implement engagement frameworks that are culturally sensitive and responsive to the specific needs and contexts of each community we serve. This will involve:

City of Phoenix, Arizona  
Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Application

- Conduct community meetings and/or forums to gather input and feedback directly from MHC residents and other stakeholders before finalizing and launching programs included in this application.
- Utilizing a variety of communication channels (e.g., social media, newsletters) to ensure information reaches a broad audience, including those who might not typically participate in traditional engagement processes.

*Targeted Outreach to Underserved Communities:*

Conduct targeted outreach efforts to ensure the participation of groups least likely to engage, such as non-English speakers, elderly residents, and economically disadvantaged groups. The City will host discussions with those involved in previous displacement activities to review lessons learned.

*Feedback and Continuous Improvement:*

Establish mechanisms to continually collect and utilize ongoing feedback from participants and stakeholders to improve engagement strategies and program outcomes. This may include surveys, focus groups, and feedback forms distributed at various program stages.

*Transparency and Accountability:*

Ensure transparency in all project phases by openly sharing plans, progress reports, and outcomes with the community and stakeholders, building trust, and maintaining strong partnerships.

This inclusive approach aligns with broader organizational goals of fostering equitable community development and ensuring that every resident can contribute to and benefit from our initiatives.

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

Our proposal for the PRICE Main grant is designed to align with several existing comprehensive and strategic plans within the City of Phoenix. These include the Housing Phoenix Plan, the HUD 5-Year Consolidated Plan and 1-Year Action Plan, the Strategies to Address Homelessness Plan, the Analysis of Impediments to Fair Housing Choice, and the Phoenix General Plan. Additionally, it aligns with regional initiatives such as MAG's Pathways Home: A Regional Homelessness Action Plan for Local & Tribal Governments.

*Alignment with Current Plans*

- Housing Phoenix Plan: Our proposal supports the plan's goal to create or preserve 50,000 housing units by 2030, specifically by targeting the preservation and enhancement of Manufactured Housing Communities (MHCs), a critical part of the city's Naturally Occurring Affordable Housing (NOAH) stock.
- HUD 5-Year Consolidated Plan and 1-Year Action Plan: These plans emphasize the need for affordable housing and community development projects that benefit low- and moderate-income individuals. Our proposal supports these goals by rehabilitating and preserving affordable manufactured homes.

City of Phoenix, Arizona  
Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Application

- Strategies to Address Homelessness Plan: Our proposal improves the quality and affordability of manufactured homes, helping prevent displacement and homelessness, directly contributing to the plan's objectives.
- Analysis of Impediments to Fair Housing Choice: Our efforts to enhance MHCs and support the establishment of Resident-Owned Communities (ROCs) align with this plan's recommendations to address housing discrimination and promote equitable housing options.

*Housing Phoenix Plan*

In 2019, the Phoenix City Council launched an initiative to address the city's housing crisis comprehensively. This initiative involved identifying housing needs, creating an inventory of affordable housing, documenting housing gaps, and compiling best practices. Through extensive community engagement and feedback, the Housing Phoenix Plan was developed and adopted in 2020, with a vision to create or preserve 50,000 housing units by 2030. The plan outlines nine policy initiatives to increase housing options for residents across all income levels.

*Integration of PRICE Grant and MHCs into the Housing Phoenix Plan*

To enhance the stability and quality of MHCs, the City of Phoenix intends to use the PRICE Main grant to support substantial improvements and resident empowerment initiatives. This targeted support is designed to dovetail with several key objectives of the Housing Phoenix Plan:

Initiative 2: Amend Current Zoning Ordinance to Facilitate More Housing Options - This initiative, which has seen the approval of mobile home text amendments, directly impacts MHCs by facilitating the development and expansion of these communities, thereby ensuring they remain viable housing options.

Initiative 7: Expand Efforts to Preserve Affordable Housing Stock - By revitalizing MHCs and converting them into Resident Owned Communities (ROCs), this initiative directly preserves critical NOAH stock, maintaining affordability and preventing displacement.

Initiative 8: Enhance Public-Private Partnerships—Collaboration with organizations like ROC USA to transform MHCs into ROCs exemplifies strategic public-private partnerships that bolster community ownership and long-term sustainability.

**Exhibit E - Capacity**

**City of Phoenix**

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

The lead agency for PRICE grant administration will be the Phoenix Housing Department. The Housing Department has 129 full-time staff, 51 contract staff, and an operating budget of \$199 million. The Housing Department offers various services and programs to help residents and their families achieve their highest economic and social independence. Our programs provide public housing, Housing Choice Vouchers, affordable rental apartments, and single-family homes to more than 35,000 area residents. This includes partnering with non-profit and for-profit community organizations to preserve and develop affordable housing units. Our partnerships have led to sustainable and affordable rental housing and homeownership opportunities.

The Housing Department administers multiple HUD-funded programs and has considerable knowledge of cross-cutting regulations. These programs include the HOME Investment Partnerships Program (HOME) and the HOME Investment Partnerships-American Recovery Plan Program (HOME-ARP). The Housing Department administers over 7,500 vouchers through the Housing Choice Voucher program, where participants pay at least 30% of their monthly income toward their rent to a private landlord of their choice, and the program will pay the landlord the remaining balance of the rent. The Department administers the Veterans Affairs Supportive Housing (VASH) Program, which provides housing to veterans experiencing homelessness. Further, the Housing Department administers the HUD Housing Opportunities for Persons with AIDS (HOPWA) Program. The goal is to help persons living with HIV/AIDS and their families maintain a stable living environment that will allow access to healthcare and supportive services.

PRICE activities will be assigned to the Affordable Housing Division within the Housing Department and supported by the Management Services Division with fiscal and procurement support. This division is responsible for organizing, planning, directing, implementing, researching, and managing all nine policy initiatives listed in the Housing Phoenix Plan. These responsibilities include meeting timelines and performance objectives; identifying funding for potential projects and programs; issuing affordable housing development opportunities and managing development projects; advocating for housing with internal and external partners; working with partners to develop strategies to increase housing for our community; and ensuring excellent customer service for customers.

Below is the Housing Department's organizational chart, which includes the Affordable Housing and Management Services Divisions. These divisions will be primarily responsible for grant implementation and fiscal and procurement duties.

City of Phoenix, Arizona  
 Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Application



3/8/2023

**HOUSING DEPARTMENT**  
 Organizational Chart

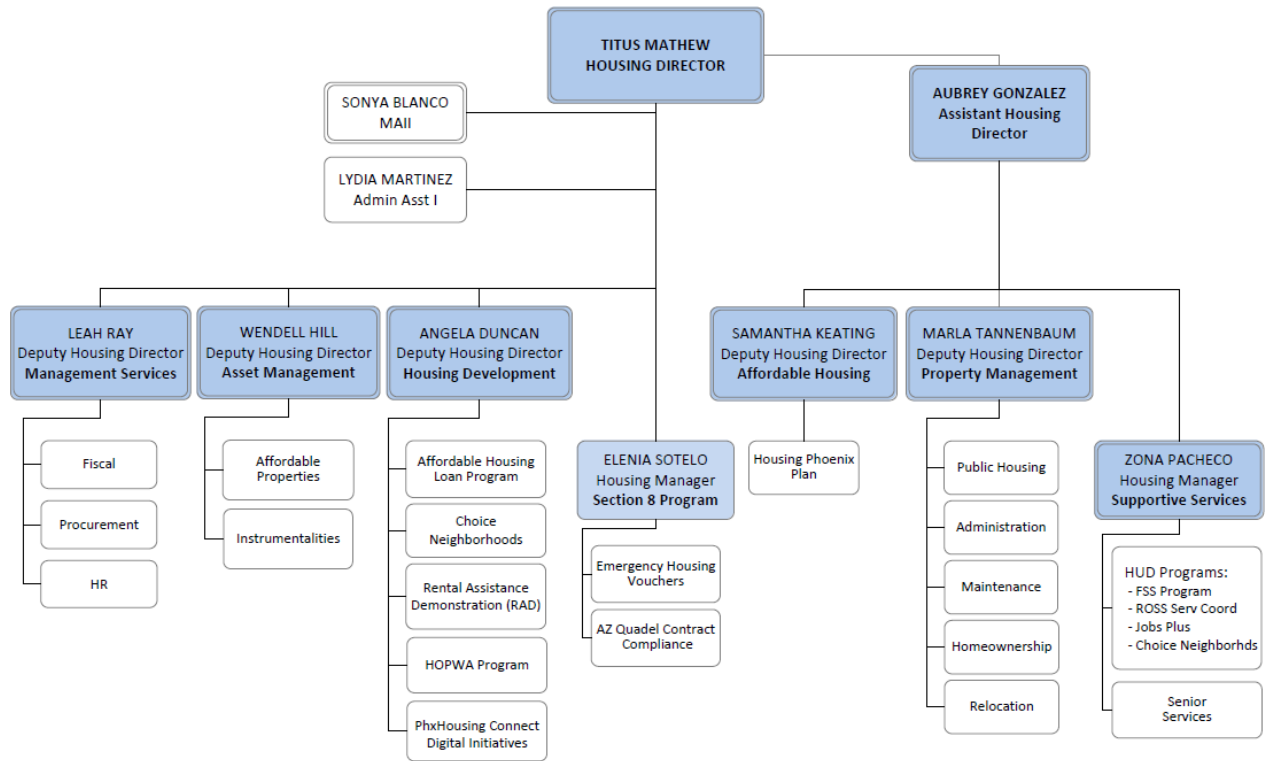


Figure 1: Phoenix Housing Department Org Chart

**Describe how your organization will manage partner organizations, if applicable, to ensure they meet the expectations for successful project implementation. Describe any gaps, vacancies, and contingency plans addressing potential staff or partner loss during the project.**

The Phoenix Housing Department will administer the PRICE Housing grant in close partnership with the City of Phoenix Human Services and Neighborhood Services Departments.

The City of Phoenix Neighborhood Services Department (NSD) plays a pivotal role in enhancing Phoenix neighborhoods' physical, social, and economic health. Tasked with fostering neighborhood self-reliance and improving residents' quality of life, the NSD employs community-based problem-solving techniques and neighborhood-oriented services and fosters public-private cooperation to achieve its goals.

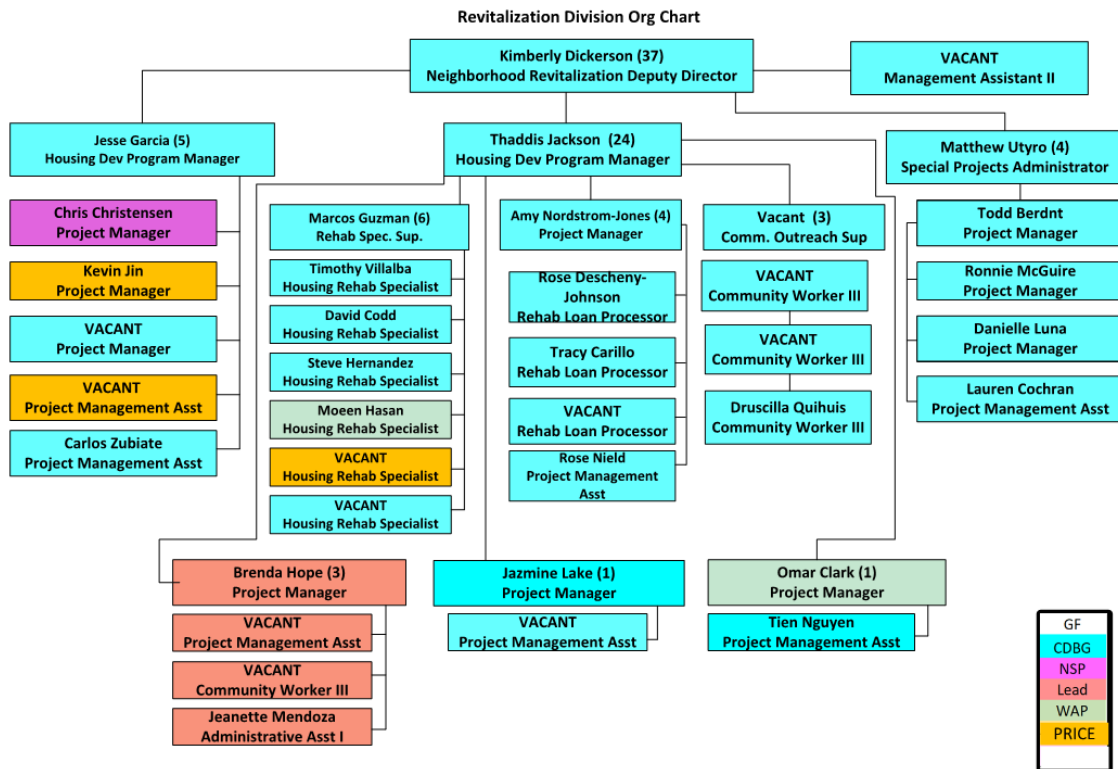
NSD is responsible for managing HUD entitlement grants, such as the Community Development Block Grant (CDBG). Integral to its operations, NSD oversees the preparation of the Consolidated Plan (ConPlan), Annual Action Plans, and Consolidated Annual Performance

City of Phoenix, Arizona

Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Application

Evaluation Reports (CAPER). Additionally, the department is crucial in administering the Request for Proposal (RFP) process and recommending CDBG subrecipients to the City Council for approval.

For the 2023-2024 budget year, NSD is managing a significant budget of \$50 million allocated for various initiatives, including Blight Elimination, Neighborhood Engagement, Neighborhood Infrastructure, Neighborhood Commercial Revitalization, and Special Programs.



The Human Services Department (HSD) of Phoenix, designated as a Community Action Agency, plays a pivotal role in enhancing the city's framework by promoting its residents' economic, physical, and social well-being. Funded through a diverse array of sources, including the General City Sales Tax, Primary Property Taxes, State Shared Revenues, and a variety of grants and donations, HSD is equipped to deliver a comprehensive suite of services aimed at fostering self-sufficiency and addressing both immediate and long-term needs across the community.

For the fiscal year 2023-2024, the department manages a budget of \$172.8 million, supporting a broad spectrum of programs such as Workforce Development, the Central City Addiction Recovery Center, and extensive homeless services, including emergency shelter, housing, and outreach programs. The department also oversees the Office of Refugee, Asylee, and Immigrants, Victim Advocacy Services, and several victim-centered programs focusing on housing and traumatic event services.

As a Designated Community Action Agency, HSD administers critical programs, including the those that utilize other funding, Temporary Assistance for Needy Families (TANF), State Small



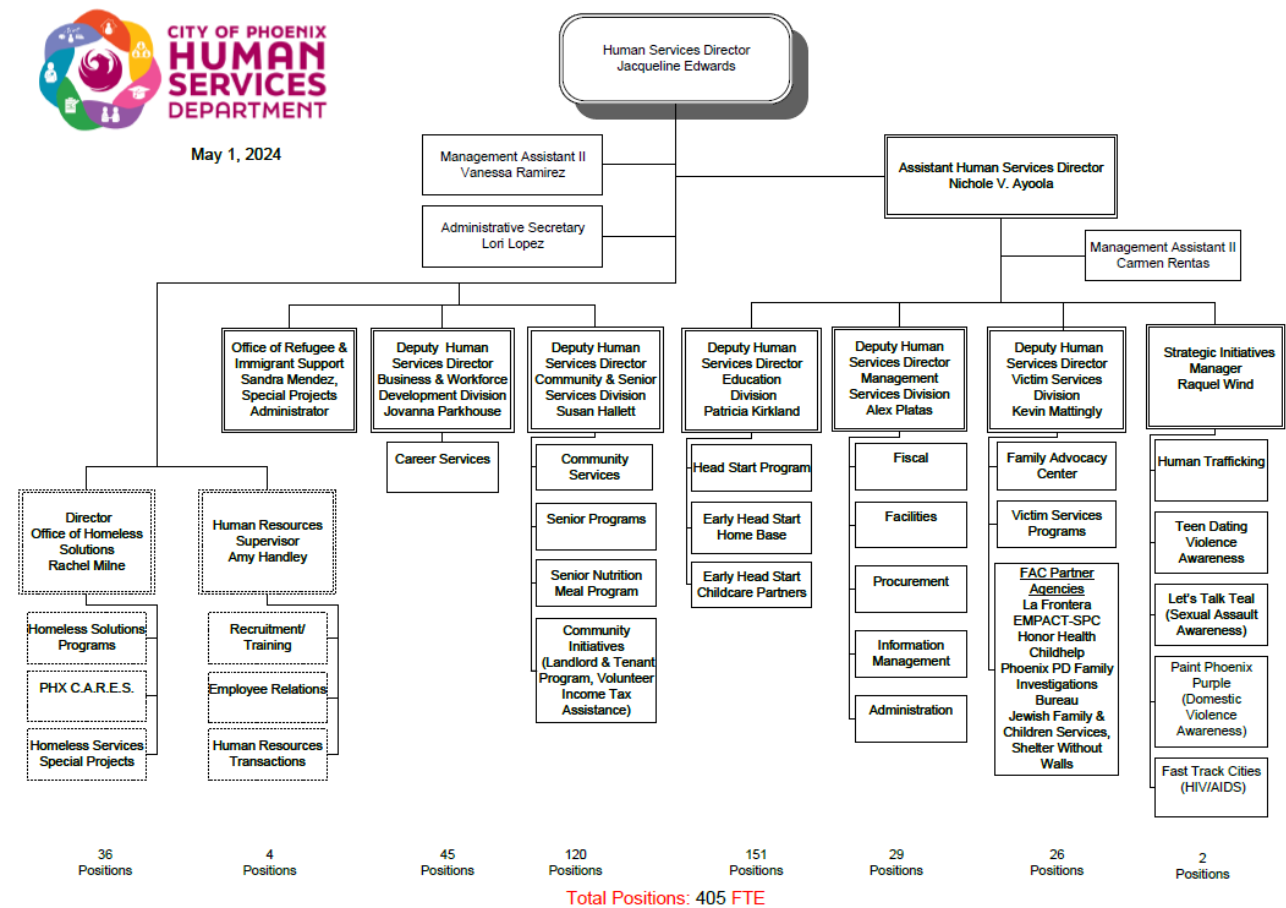
City of Phoenix, Arizona

Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Application

Business Credit Initiative (SSBCI), and the Local Utility Assistance Fund. These initiatives provide vital support for Phoenix residents, from emergency relief to sustainable development opportunities.

HSD’s robust service delivery system includes three family service centers offering case management and eviction prevention, emergency utility bills and rental assistance, and 15 senior centers providing activities, classes, on-site meals, and transportation services for seniors. The department also facilitates home-delivered meals to homebound and disabled seniors, including education on landlord and tenant rights, free tax preparation, and financial education.

HSD’s strategic initiatives enhance community resilience and economic stability. This includes a significant partnership with Phoenix IDA, utilizing \$600,000 in ARPA funds to assist 126 households in three Manufactured Housing Communities (MHCs) facing redevelopment. This program has supported 393 individuals with housing navigation, case management, rental and utility assistance, relocation support, resource referrals, and health and mental health services.



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

**Provide at least one example of your experience managing and expending grant funds (ideally, but not necessarily federal grant funds such as CDBG, NSP, CDBG-DR, HOME, or Section 108) to complete a project. Describe funds expended, for what purpose, and any challenges you experienced.**

**Example:**

In 2021, Phoenix faced significant challenges when three Manufactured Housing Communities (MHCs)—Las Casitas, Weldon Court, and Periwinkle—were slated for redevelopment. These communities predominantly housed Hispanic/Latino populations, with Las Casitas hosting 124 individuals, Weldon Court 198 individuals (96.5% Hispanic/Latino, 0.5% Asian, and 3% White), and Periwinkle 71 residents (97.2% Hispanic, 1.4% Black, and 5.6% White). Many of these residents were seniors or elderly who had lived in their homes for many years, deeply rooted in their community.

Many of the MH units were pre-1976 and not eligible for relocation or severely worn, and a high percentage of residents were non-English speakers or had limited English proficiency, so there was a limited understanding of available resources.

“It's very frustrating and confusing that people can just sit down and watch us head towards homelessness,” said Alondra Ruiz, a Periwinkle resident, at a Feb. 1 City Council committee meeting.

“Mobile home park residents are being caught in the difficult convergence of rising property values, raising rents and rising homeless in our city. We need to put every tool at our disposal on the table to ensure these residents are protected,” said City Councilmember Betty Guardado, “We cannot have mobile home park residents pushed onto the street.”

The city intervened to negotiate extended eviction timelines. It adopted a plan utilizing \$600,000 in American Rescue Plan Act (ARPA) funds to assist these residents with relocation and case management services managed by the Human Services Department, in collaboration with Phoenix IDA and partnerships with the Housing and Neighborhood Services Departments.

Assistance provided to the residents included housing navigation, case management, rental and utility support, health and mental health services, and resource referrals. Efforts were made to accommodate the diverse needs of the residents: some were relocated to live with family, others moved into affordable housing rental units, and some qualified for home purchase programs. The city also facilitated the legal abandonment process, ensuring residents received maximum compensation for their homes.

This initiative demonstrated effective grant fund management and underscored the need for preemptive support to maintain MHC stability and prevent redevelopment. It also highlighted the importance of coordinated efforts among city departments and external NGO partners to support the necessary infrastructure and environmental improvements in MHCs.

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

The City of Phoenix has extensive experience managing grant funds effectively across multiple

## City of Phoenix, Arizona

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

departments, with over 750 staff collectively involved. The Phoenix Housing Department, the primary administrator of the PRICE Main grant, oversees an operating budget of \$199 million and a wide array of HUD-funded programs, including HOME, HOME-ARP, and the Housing Choice Voucher program.

The Neighborhood Services Department (NSD) manages a \$50 million annual budget, directing HUD entitlement grants like CDBG towards blight elimination and neighborhood revitalization. Similarly, the Human Services Department, a Designated Community Action Agency, administers significant funding from sources such as CDBG and TANF to support services ranging from homelessness assistance to workforce development, contributing to the city's overall grant management portfolio.

These departments manage over \$360 million in grant funding in total, exemplifying Phoenix's commitment to leveraging these resources to enhance community well-being and infrastructure.

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

Phoenix is placing the administration of the PRICE grant in three competent, high-performing Departments with a combined total of over 750 employees. Within each department, a lead division has been identified. The key positions that will participate in grant activities are described below. The Affordable Housing Division is increasing staffing by adding a Project Management Assistant to their team. This will further expand the capacity of the team to undertake PRICE Main activities.

Housing Department—Housing Director Titus Mathew and Assistant Housing Director Aubrey Gonzalez will be involved in setting policy objectives and monitoring, evaluating, and acting as technical advisors on management and program matters for staff working on the PRICE grant. They will confer with other officials, residents, and community organizations to explain the City's housing objectives, policies, services, and needs. They will also recommend policy, procedure, and program development and implementation changes as needed for the program.

The Deputy Housing Director – Affordable Housing Samantha Keating will have general oversight of the PRICE grant activities and is also responsible for serving as the Affordable Housing Division leader, overseeing the Council-approved Housing Phoenix Plan (HPP), as well as managing and overseeing the implementation of all programs and policy initiatives identified in the HPP and assisting in meeting the goal of creating or preserving 50,000 homes by 2030. This position supervises the HPP team, which comprises a Housing Manager, Project Manager, and a new Project Manager Assistant position. For the PRICE grant, these positions will be responsible for organizing efforts of multiple city departments, managing contractors, managing contracts, researching, analyzing, reporting, providing recommendations to management on department processes, and communicating with external stakeholders on behalf of the City as needed.

The Affordable Housing Division Project Manager, Nicole Garcia, will be responsible for the day-to-day responsibilities of the grant. These responsibilities will include meeting the grant's timeline and performance objectives; advocating for housing with internal and external partners;

## City of Phoenix, Arizona

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

working with partners in the Neighborhood Services and Human Services departments to ensure the smooth implementation of the grant; and providing excellent customer service for applicants of the program and stakeholders. The Project Manager will establish cooperative working relationships and make decisions according to PRICE requirements, applicable CDBG regulations, cross-cutting requirements, and existing laws and City policies.

The Affordable Housing Division Project Management Assistant position is currently in recruitment. Once this position is filled and training is complete, some duties may be transferred from the Project Manager based on staffing needs. This may include collaboration on the implementation of the nine HPP initiatives and tracking key performance indicators related to their progress and goals which PRICE Housing will bolster; preparing Council reports concerning HPP initiatives; assisting with development projects, and monitoring funding and development contracts and timelines.

Under the leadership and guidance of the Deputy Management Services Director Leah Ray, the Accounting Manager will oversee all grant funding, including grant accounting, accounts payable and receivable, financial reporting, auditing, and monthly monitoring of expenditures and budgeting for the grant. The Fiscal team consists of the following full-time employee positions: Accounting Manager, Budget Supervisor, Accounting Analyst, two Budget Analyst II positions, two Accountant II positions, and two Account Clerk III positions.

The Housing Manager—Contracts/Procurement reports to the Deputy Management Services Director and is responsible for ensuring compliant and fair procurement of any needed grant activities and the completion of a contracting process.

#### **Human Services Division**

Susan Hallett, MEd, BSW - Deputy Human Services Director, City of Phoenix Susan Hallett serves as the Deputy Human Services Director for the City of Phoenix, leading the Community and Senior Services Division within the Human Services Department. With a robust social work and education background, holding both a Master of Education (MEd) and a Bachelor of Social Work (BSW), Susan has dedicated over 35 years to serving vulnerable populations across various capacities.

Under her leadership, the Human Services Department is the state's largest Community Action Agency, impacting over 8,000 households annually through services provided at three Family Services Centers. Additionally, her division administers critical programs for nearly 5,000 seniors across 15 Senior Centers in Phoenix and manages the Senior Nutrition Meal Program, which delivers 300,000 meals each year to homebound and disabled seniors.

Since March 2021, in response to the COVID-19 pandemic's severe impact on employment and housing stability, Susan has directed a significant emergency assistance initiative, managing a \$148 million U.S. Department of Treasury fund. This program provides vital rental and utility assistance to Phoenix residents, reflecting her commitment to community welfare and support during critical times.

City of Phoenix, Arizona

Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Application

Before joining the City of Phoenix, Susan's career included pivotal roles such as deputy and regional director positions within the Maricopa County Superior Court Juvenile Division and First Things First. She also contributed significantly to the Arizona Department of Economic Security and the Department of Child Safety and later advanced to become the Senior Director for Arizona and New Mexico at Casey Family Programs, a national foundation focused on improving child welfare systems.

Neighborhood Services Department— Neighborhood Services Revitalization Division, Community Development Housing Development Manager, Jesse Garcia, and Project Manager, Kevin Jin, will be responsible for the day-to-day responsibilities of the NSD portion of the PRICE grant. These responsibilities will include meeting the grant's timeline and performance objectives; overseeing the acceptance and approval of applications for the program; procurement, contracting, and payment processes involving contractors, subcontractors, and sub-recipients; working with partners in Housing and Human Services to ensure the smooth implementation of the grant; and provide excellent customer service for applicants of the program and stakeholders. The staff will establish cooperative working relationships and make decisions according to the PRICE program and CDBG requirements, applicable regulations, existing laws, and City policies.

Mr. Garcia joined the City of Phoenix in April 2004 and has held job titles of Project Management Assistant and Project Manager in the Economic Development and Neighborhood Services Departments. Mr. Garcia has 23 years of experience as a real estate/housing professional with current responsibilities including HUD Funded CDBG Community and Economic Development Programs, Neighborhood Revitalization, Housing Development, Down payment Assistance, Commercial Redevelopment, Real Estate Acquisition/Disposition, and Asset Management. Mr. Garcia has a Bachelor of Science from Arizona State University and is a certified Housing Development Finance Professional (HDFP) from the National Development Council (NDC).

Mr. Jin has worked for the City for 26 years, with the last 15 years in project management and program delivery as a real estate/housing professional. Mr. Jin has experience with program eligibility for federally funded programs, procurement and contract management, real estate and redevelopment activities, and oversight of housing development, rehabilitation, infrastructure and enhancement, and weatherization programs, incorporating many federal funding sources, including NSP, CDBG, HOME, LIHEAP, URRD, and DOE Weatherization and Energize PHX. Mr. Jin has a Bachelor of Science Degree from Arizona State University and is pursuing a Housing Development Finance Professional (HDFP) certification from the National Development Council (NDC).

**Describe how your organization will manage partner organizations, if applicable, to ensure they meet the expectations for successful project implementation. Describe any gaps, vacancies, and contingency plans addressing potential staff or partner loss during the project.**

In managing partner organizations, the City of Phoenix employs a rigorous approach to ensure accountability and the achievement of project expectations for successful implementation. This

management process begins with a structured set of agreements and conditions tailored to each project, which outlines clear expectations, timelines, and accountability measures. Our team of experienced project managers ensures that all projects progress by these predefined parameters. To address and preempt potential gaps in funding or project execution, the City convenes regular coordination meetings involving all key stakeholders, including statewide funders and partner organizations. These meetings facilitate a proactive approach to identifying and resolving funding shortfalls and ensuring continuity in project implementation.

Recognizing the complexities of project management, particularly in a dynamic economic environment, we maintain a contingency fund specifically allocated to address unforeseen cost overruns or financial gaps. This strategic reserve has proven essential, especially during periods of market volatility, such as those experienced during the pandemic, ensuring that projects continue without disruption.

Our robust monitoring processes involve formal evaluations at various project stages. These evaluations ensure that performance benchmarks are consistently met and that projects remain on track to meet their goals.

Regarding staffing continuity and human resource management, the City has implemented a cross-departmental structure to develop the project team. This ensures that multiple staff members are equipped to handle core functions of program implementation and oversight. This redundancy plan effectively mitigates the risks associated with staff turnover, safeguarding the continuous and effective administration of projects.

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

The City of Phoenix has a strong track record of promoting racial equity and working directly with underserved communities, particularly within our non-white populations.

Phoenix's demographic makeup is diverse, with approximately 42% Hispanic or Latino and 7% Black or African American residents, among other racial and ethnic groups. The city's efforts to advance racial equity are reflected in its proactive approach to addressing the needs of these populations, particularly in the context of housing and community services.

An example of Phoenix's dedication to racial equity was its response to the pending redevelopment of three Manufactured Housing Communities (MHCs)—Las Casitas, Weldon Court, and Periwinkle—mentioned above. These communities predominantly housed Hispanic/Latino residents, who represented most of those affected by redevelopment plans.

The City of Phoenix ensures that its staff are continually educated on diversity, equity, and inclusion (DEI) principles. This training enhances their understanding and responsiveness to the unique challenges faced by underserved and marginalized communities, enabling more effective service delivery and program development.

Phoenix's commitment to racial equity extends beyond crisis management. It includes long-term strategies to prevent displacement and enhance the living conditions within MHCs and other vulnerable communities. By integrating DEI practices across all city departments and fostering

ongoing dialogue with community members, Phoenix strives to create a more inclusive and equitable environment for all its residents.

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

The City of Phoenix has extensive experience conducting environmental reviews by 24 CFR Part 58, which applies to state governments, tribal governments, units of general local government, and non-profits in consortium with any of the entities mentioned above. Our teams across multiple departments, including the Neighborhood Services Department and the Housing Department, have a deep understanding of the environmental review processes required by HUD and other federal agencies.

These departments will act as the lead agencies for overseeing these reviews, ensuring that all physical development activities, property acquisitions, and other related actions comply with the necessary environmental regulations before any HUD funds are committed or expended. This process includes comprehensive assessments to evaluate the potential environmental impacts of proposed projects on the surrounding area.

For example, our environmental review process has been applied rigorously in recent large-scale urban development projects involving housing, infrastructure upgrades, and community facilities. These reviews ensure that each project adheres to HUD regulations and aligns with local environmental standards and community safety objectives. The process includes public consultation phases to gather input and address community concerns regarding environmental impacts.

Our environmental review teams collaborate with local and state environmental agencies to synchronize our reviews with broader ecological protection goals. This collaboration includes assessing Environmental Impact Statements and Environmental Assessments and making determinations based on these documents to ensure consistency with local, state, and federal environmental and land use policies.

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

The City of Phoenix is thoroughly familiar with cross-cutting federal requirements, having extensive experience in managing and complying with these standards across various departments and programs. Our adherence to 2 CFR Part 200, which encompasses Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, is fundamental to our operations. This compliance is facilitated through our centralized grants management system, which ensures that these uniform guidelines administer all federal funds.

Our procurement policies are specifically designed to align with federal regulations, including 2 CFR Part 200.318 – 327, ensuring that all purchases made with federal funds meet the stringent standards required by the government. This includes adherence to Davis-Bacon labor standards, where applicable, where we ensure that all contractors and subcontractors involved in federally funded projects pay their laborers and mechanics at least the prevailing wages and benefits as determined by the Department of Labor.

City of Phoenix, Arizona  
Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Application

The City of Phoenix is committed to affirmatively furthering fair housing and nondiscrimination. We actively enforce nondiscrimination policies and fair housing laws across all housing and community development projects. This commitment extends to compliance with the Uniform Relocation Act (49 CFR 24), ensuring that individuals and businesses displaced by federal or federally assisted projects are fairly compensated and assisted in relocation.

The City also rigorously adheres to other cross-cutting requirements such as anti-lobbying, anti-discrimination, and lead-based paint regulations, which are integral to our operations when dealing with CDBG (Community Development Block Grant) and HOME (HOME Investment Partnerships Program) activities. Our Human Services, Housing, and Neighborhood Services Departments participate in the city's annual single audit process to review compliance with federal funds, ensuring that all standards are met, and any discrepancies are addressed promptly.

By maintaining strict internal controls and continuous training for our staff on these federal regulations, the City of Phoenix ensures comprehensive compliance and effective management of federal awards, supporting our programs' integrity and success.



**Exhibit F - Leverage**

**City of Phoenix**

### **Sources and amounts of leverage**

The City of Phoenix is committed to providing substantial in-kind staff time to carry out the program, which is expected to increase over the grant period as costs for staff time and employee-related expenses increase annually. Formal letters of leverage commitment from the (Housing Department, Human Services, and Neighborhood Services Department) are included in the Attachments.

For this application, the City of Phoenix has secured leveraged funding of \$1,100,000 in local utility assistance funds, which will provide weatherization and energy assistance support for PRICE manufactured home repair and rehabilitation activities. Funds are provided by local utility providers APS, SRP, and Southwest Gas.

### **Risks and Contingency**

In developing our proposal, we have carefully designed our programs to be adaptable and scalable. Should the City of Phoenix not receive the full \$75 million requested through the PRICE program, our strategy will involve scaling the scope of our activities accordingly. We intend to maintain the integrity and objectives of our initial proposal, albeit on a smaller scale. This approach allows us to continue addressing the critical needs within our Manufactured Housing Communities by prioritizing projects based on urgency and impact. We will also seek to leverage partnerships and collaborations within the community to maximize the effectiveness of the funds received and ensure that our goals are met efficiently and effectively.

**Exhibit G Long-term Effect**

**City of Phoenix**

**How will your proposed activities retain other affordable housing opportunities for LMI households in the community? How will you ensure LMI households are not eventually priced out of the community? How will your proposal make manufactured housing or MHCs livable, sustainable, and resilient?**

Our proposal advances access to affordable housing and promotes long-term stability and wealth building for low- and moderate-income (LMI) households, particularly within manufactured housing communities (MHCs), in the following ways:

1. **Retention of Affordable Housing Opportunities:** To safeguard affordable housing opportunities, our strategy specifically targets the long-term affordability of manufactured homes for low-to-moderate income (LMI) households. By implementing restrictive covenants linked to our funding, we will secure the affordability of these units for varying durations based on the type of intervention: a 15-year term for rehabilitations, a 20-year term for replacements, and a 30-year term for infrastructure improvements.
2. **Stable Homeownership and Lot Ownership:** We intend to transition residents from renters to owners by facilitating the conversion of 2-3 MHCs to resident-owned communities (ROCs). Ownership of the manufactured homes and the lots on which they sit provides a stable housing environment and allows residents to build equity.
3. **Enhanced Resilience and Sustainability:** Our proposal aims to bolster the resilience and sustainability of manufactured housing and MHCs against natural hazards and climate impacts. We plan to repair or rehabilitate MHC units, adopting modern construction standards and retrofitting existing structures with weather-resistant materials. We anticipate also replacing MH units that predate June 1976 with newer models. These upgrades will improve safety and durability while contributing to their long-term sustainability.
4. **Support for Underserved Communities:** We will advance housing access and justice for vulnerable populations, including historically underserved communities of color, by integrating housing navigation, case management and financial assistance for existing residents. Educational resources will be provided to inform residents about their rights and available resources, informing their decisions about their housing needs.
5. **Community Benefits and Wealth Building:** Community development and individual wealth building are achieved through increased property values resulting from improvements and by providing residents with the tools and knowledge to maintain and capitalize on their investments.

This proposal aligns with the PRICE Main grant's goals to create lasting impacts beyond the grant's initial term. These efforts will ensure that manufactured homes and communities in Phoenix become exemplars of affordable, sustainable, and resilient housing, setting a standard for similar initiatives nationwide.

**Attachment A Advancing Racial Equity**  
**City of Phoenix**

### *Analyzing the Racial Composition*

The City of Phoenix's application for the HUD Preservation and Reinvestment Initiative for Community Enhancement (PRICE) grant intends to benefit a diverse racial demographic primarily residing in underinvested urban areas and manufactured housing communities (MHCs). According to recent census data, Phoenix has a diverse population with 42% White, 42% Hispanic, 7% Black, 4% Asian, and 3.5% Mixed. 19.9% of the population, including 19% of children under 18 and seniors 65+, are living below the poverty line. This underscores the need for inclusive and equitable housing solutions.

### *Identifying Barriers to Equitable Benefit*

- 1. Infrastructure Decay:** Many MHCs suffer from outdated infrastructure which disproportionately affects communities of color, exacerbating social and economic disparities.
- 2. Lack of Resilient Housing:** Manufactured homes in these communities often lack the necessary weatherization and climate resiliency adaptations, making them vulnerable to extreme weather conditions such as heatwaves and flooding.
- 3. Economic Constraints:** High utility costs and the financial burden of necessary repairs limit the ability of residents, predominantly from minority backgrounds, to invest in improving their living conditions.

### *Steps to Prevent, Reduce, or Eliminate Barriers*

To effectively address these challenges, the City of Phoenix proposes the following targeted actions:

- 1. Infrastructure Modernization in MHCs:** Upgrade essential infrastructure within MHCs, including lighting enhancements, road repairs, better drainage systems, and reliable electrical wiring to enhance living conditions and safety.
- 2. Climate Resiliency and Weatherization Enhancements:** Implement specific projects to increase the climate resilience of manufactured homes and MHCs, such as improved insulation, roofing, and reflective roofing upgrades, HVAC system repair or installation, low-flow water fixtures, and repair and elevation of site pads to mitigate the impacts of flooding and extreme temperatures.
- 3. Subsidized Rehabilitation, Relocation or Replacement:** Offer financial support for upgrading manufactured homes, emphasizing essential repairs and enhancements to plumbing and electrical systems to decrease utility expenses and boost energy efficiency. Funding will be provided to support these moves for homes requiring relocation. However, homes built before June 15, 1976, do not qualify for relocation and must be replaced under this initiative.

City of Phoenix, Arizona  
Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Application

This strategy ensures that the grant activities not only improve the physical and economic conditions of MHCs and manufactured homes but also contribute significantly to advancing racial equity in alignment with federal nondiscrimination requirements and the goals of Executive Order 13985. The City of Phoenix is dedicated to transforming these vulnerable communities into resilient, sustainable environments where all residents have equitable opportunities to thrive.

This approach leverages the City of Phoenix's existing Consolidated Plans and assessments to demonstrate a clear, actionable commitment to advancing racial equity.

**Attachment B Affirmative Marketing  
City of Phoenix**



## City of Phoenix, Arizona

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

The City of Phoenix is committed to ensuring equal opportunity and access for all persons, including persons in protected classes and limited English proficiency residents, to all of our programs and services. We will operate this program citywide, ensuring new affordable housing units have the best chance of being equally accessible and spread throughout the jurisdiction. The program will not include geographic prioritization in certain neighborhoods to disincentivize concentrating housing in areas that are not well-resourced and allow for greater production of housing in well-resourced areas throughout the city.

#### *Leveraging Insights from Past Engagements*

In the City of Phoenix, residents of mobile home communities have increasingly faced the threat of displacement due to redevelopment. To address these urgent concerns, an internal work group was established on September 28, 2022, following consultations with the Mayor and City Council. This group's mandate was to explore how the city could assist families facing imminent displacement and to devise strategies to mitigate such risks in the future.

The team diligently evaluated a range of legal and financial interventions that the City could employ to support tenants of the displaced communities. Moreover, they investigated long-term solutions to prevent recurrence of these issues. The group's findings were detailed in a research report first issued on November 25, 2022, with a subsequent update provided on February 23, 2023.

The insights gained from these meetings and reports have been instrumental in shaping the programs proposed in our grant. These initiatives are designed with a deep consideration of the residents' needs and aim to be implemented citywide to promote fair housing and ensure equitable treatment for all community members.

#### *Targeted Outreach and Engagement Strategies*

1. Community-Based Workshops:
  - Conduct comprehensive outreach meetings in partnership with the City of Phoenix Neighborhood Services Department (NSD) and Human Services Department (HSD) before finalizing program design, ensuring meetings are held in accessible locations and offered in a hybrid format to maximize attendance and participation. This ensures that all community members have the opportunity to engage with us directly and provide feedback on this application and on the City of Phoenix PRICE programs.
2. Multilingual and Accessible Communication:
  - All outreach materials will be available in Spanish and other relevant languages to assist limited English proficiency residents. We will ensure that our digital platforms are ADA-compliant, providing equal access to individuals with disabilities.
3. Digital Engagement:
  - Enhance digital engagement by hosting program information on our department websites for easy access and actively promoting programs and related meetings

City of Phoenix, Arizona  
Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Application

through our social media channels to ensure community awareness and participation.

*Documentation and Continuous Improvement*

We will document all marketing and outreach activities, maintaining records of stakeholder engagement, attendee feedback, and the effectiveness of different marketing channels. This data will allow us to continually refine our approach and ensure our marketing strategies effectively reach and resonate with the target demographic groups.

By integrating the insights from our previous stakeholder engagements and focusing on inclusive, accessible communication methods, the City of Phoenix aims to ensure that the benefits of the HUD PRICE grant reach all corners of our community, especially those historically underrepresented in housing and community development programs. This affirmative marketing strategy will foster inclusive growth and equitable access to improved housing solutions across Phoenix.

**Attachment C Affirmatively Furthering Fair Housing  
City of Phoenix**

## City of Phoenix, Arizona

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

The City of Phoenix is dedicated to affirmatively furthering fair housing (AFFH) as part of its application for the HUD Preservation and Reinvestment Initiative for Community Enhancement (PRICE) grant. Our efforts focus on overcoming historic patterns of segregation and transforming racially or ethnically concentrated areas of poverty into thriving communities of opportunity, particularly in Manufactured Housing Communities (MHCs) and through the rehabilitation of manufactured housing.

#### *Addressing the Need for Affordable, Accessible Housing*

The project area encompasses multiple sites within the City of Phoenix, prioritizing distressed areas where low- to moderate-income (LMI) households predominantly reside. These communities have been identified as having a critical need for affordable and accessible housing due to factors such as high poverty rates, substandard living conditions, and susceptibility to natural disasters, including extreme heat and flooding.

#### *Barriers to Fair Housing*

Our assessment identifies several barriers that inhibit fair housing:

- **Economic and Regulatory Hurdles:** High land values and restrictive land use controls make it difficult for LMI households to secure housing. Complicated permitting procedures and funding limitations for Manufactured Housing further exacerbate these challenges.
- **Infrastructure Deficiencies:** Many MHCs lack the necessary infrastructure upgrades, discouraging investment in these areas and perpetuating poverty.
- **Historical Segregation:** Patterns of segregation and concentrated areas of poverty limit access to opportunity for protected class groups, particularly non-white, and Indigenous communities, as well as seniors and individuals with disabilities.

#### *Meaningful Actions to Promote Fair Housing*

The City of Phoenix proposes the following actions to address these issues:

- **Rehabilitation, Repair, and Replacement:** We plan to renovate and repair a target of 100 Manufactured Homes, focusing on critical upgrades like roofing, HVAC systems, electrical and plumbing, and weatherproofing to withstand extreme heat and monsoon seasons. We will also offer a replacement for pre-1976 manufactured homes that fail to meet safety and efficiency standards.
- **Community Transformation through Preservation:** A significant milestone will be converting two to three MHCs into resident-owned communities (ROCs) in collaboration with ROC USA or another non-profit, promoting long-term affordability to prevent displacement and foster community ownership.
- **Infrastructure Enhancements:** We are committed to bolstering the resilience of Manufactured Housing Communities (MHCs) against natural disasters and significantly

City of Phoenix, Arizona  
Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Application

enhancing their livability. Our strategy includes comprehensive upgrades to crucial infrastructure components such as drainage systems, lighting, plumbing, electrical systems, and site pad repairs. Additionally, we will revitalize communal facilities to enrich community life. We have strategically prioritized MHCs where more than 51% of the residents are classified as low to moderate-income (LMI), ensuring that our efforts directly benefit those most needing improved living conditions.

- **Comprehensive Resident Services:** In partnership with the City of Phoenix Human Services Department, beginning in year two, we will provide comprehensive case management to an estimated 480 manufactured housing households per year (2,400 in total), helping them navigate and connect with essential resources such as educational materials, financial programs, utility assistance, and other critical services. This support aims to enhance residents' overall well-being and stability, ensuring they have access to the necessary tools to improve their living conditions and maintain housing security.

*Compliance and Integration*

These initiatives will be carried out in full compliance with the Fair Housing Act and its implementing regulations. We will maintain ongoing dialogues with the community to ensure that all actions taken effectively address the needs of protected class groups. The City of Phoenix also plans to partner with local organizations that have established trust within these communities to facilitate outreach and ensure that our efforts align with the real needs of the residents.

A key focus of our strategy is the protection and enhancement of existing naturally occurring affordable housing (NOAH) stock, particularly within Manufactured Housing Communities (MHCs). By preserving and revitalizing this crucial segment of our housing market, we aim to provide safe, accessible, and healthy housing options that not only maintain affordability but also promote integration, reduce segregation, and transform areas of concentrated poverty into vibrant areas of opportunity.

The City of Phoenix is committed to affirmatively furthering fair housing by taking meaningful actions to provide safe, accessible, and healthy housing options, promote integration, reduce segregation, and transform areas of concentrated poverty into areas of opportunity. We are committed to continuously monitoring and adapting our strategies to meet these goals effectively, ensuring compliance with all civil rights laws and furthering the principles of fair housing throughout the City of Phoenix.

**Attachment D Eligible Applicants**

**City of Phoenix**

## City of Phoenix, Arizona

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

The City of Phoenix is an eligible applicant under Section III.A of the HUD PRICE NOFO, specifically categorized as "City or Township Governments." We are committed to collaborating with internal and external partners to implement our proposed project, which focuses on the preservation, rehabilitation, and repair of, Manufactured Housing Communities (MHCs) and for individual manufactured housing units in addition to case management and relocation assistance for existing residents.

The City of Phoenix Housing Department is the sole applicant for the HUD PRICE grant. To manage and implement this project effectively, we are engaging in strategic internal partnerships within the City government.

#### *Internal Collaboration and Roles*

- **City of Phoenix Neighborhood Services Department:** This department manages the city's Community Development Block Grant (CDBG) funding and will collaborate closely with the Housing Department to handle all aspects of rehabilitation and infrastructure improvements. Their expertise in managing federal grants will ensure that the project adheres to all regulatory requirements and maximizes the impact of available resources.
- **City of Phoenix Human Services Department:** This department will provide comprehensive case management services, assisting residents in connecting with essential resources such as financial assistance programs and utilities support. Their involvement will ensure that the social and economic needs of the residents are addressed alongside physical housing improvements.

#### *Partnerships*

Although this application does not include a Memorandum of Understanding (MOU), it is supported by a strong framework of internal cooperation and a clear intention to work collaboratively across City departments. Additionally, we have secured a letter of intent from ROC USA. This letter indicates ROC USA's commitment to engage with the City of Phoenix upon grant award, aiming to identify a target of two to three Manufactured Housing Communities suitable for conversion into Phoenix's first resident-owned communities (ROC). This initiative aligns with the city's housing goal to preserve existing housing, and it is designed to protect residents from displacement and ensure long-term housing security.

#### *Compliance*

The City of Phoenix has attached a signed PRICE Certifications for Entitlement Local Government Applicants form, ensuring compliance with the PRICE Main statutory and regulatory requirements.

**Attachment E Evidence of Partnership Letters**  
**City of Phoenix**



City of Phoenix, Arizona  
Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Application

Letters will be included for:

- The City of Phoenix Housing Department
- The City of Phoenix Human Services Department
- The City of Phoenix Neighborhood Services Department
- ROC USA

**Attachment F Match or Leverage**  
**City of Phoenix**

City of Phoenix, Arizona  
Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Application

While the HUD Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Main competition does not require matching funds, the City of Phoenix recognizes the value of leveraging additional resources to enhance the impact and sustainability of our proposed projects. We are committed to a robust partnership approach that includes significant financial contributions and in-kind support, aligning with HUD's encouragement to leverage federal and non-federal resources for the project's success. The City of Phoenix is committing in-kind staff time to carry out the program, which is expected to increase over the grant period as costs for staff time and employee-related expenses increase annually. Formal letters of leverage commitment from the (Housing Department, Human Services, and Neighborhood Services Department) are included in the Attachments.

*Financial Contributions*

The City of Phoenix has strategically secured leveraged funding of \$1,100,000 in local utility assistance funds, providing weatherization and energy assistance support for PRICE manufactured home repair and rehabilitation activities. Funds are provided by local utility providers APS, SRP, and Southwest Gas.

*Leveraging Impact*

The leveraged funding increases the investment power of the HUD PRICE Main grant. This strategy fulfills HUD's encouragement for comprehensive project support and increases the project's potential for success and sustainability. By pooling resources additional sources, the City of Phoenix ensures that the project is well-equipped to address the complex needs of our Manufactured Housing Communities and Manufactured Housing residents.

**Attachment G Application Certifications and Standard Forms**  
**City of Phoenix**

City of Phoenix, Arizona  
Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Application

Application for Federal Assistance (SF-424)

Applicant and Recipient Assurances and Certifications (HUD 424-B)

Applicant/Recipient Disclosure/Update Report (HUD 2880)

Disclosure of Lobbying Activities (SF-LLL)

Certification of Lobbying Activities

Grant Application Detailed Budget Worksheet (HUD-424-CBW)

Assurances for Non-Construction Programs (SF-424D)

PRICE Certification