

# Vermont Department of Housing & Community Development

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## ATTACHMENTS:

- Attachment A Advancing Racial Equity Narrative (Section III F of NOF))
- Attachment B Affirmative Marketing Narrative (Section III F)
- Attachment C Affirmatively Furthering Fair Housing Narrative (Section III F and IV G)
- Attachment D Eligible Applicants documentation (Section III D)
- Attachment F Evidence of Leverage (Section III C)
- Attachment G Application Certifications and Standard Forms (Section IV B and Append. B)
- Attachment H Summary of Comments Received, List of Commenters by name.org (Section VI E) **TO BE ADDED AFTER PUBLIC COMMENT PERIOD CLOSSES**

## Vermont Department of Housing & Community Development

### Narrative Exhibit A: Executive Summary

This application is being submitted by Vermont's Department of Housing and Community Development, the State's administrator of Community Development Block Grants, and will be sub-granted to The Vermont Housing & Conservation Board (VHCB).

VHCB's proposal will pair PRICE Main funding to address infrastructure and capital needs with state resources to provide technical assistance and feasibility to non-profit and cooperative parks, and HUD EDI funding to provide high efficiency individual homes.

The applicants propose to use an award of \$15 million in PRICE MAIN funding to address critical infrastructure needs in manufactured home communities around the State of Vermont, while utilizing Housing Subsidy Covenants secured with Mortgage Deeds to ensure that these communities remain permanently affordable to low- and moderate-income Vermonters. There is substantial data, gathered through coordination of Vermont's stakeholders and funders over the last decade, to support the urgent need for this resource. Vermont's statewide policies support an approach that involves robust tenant protections and the pairing of permanent affordability with funding opportunities to address the needs of affordable housing communities.

As an organization with more than 35 years of experiencing managing a competitive application process to award funding for manufactured home communities, affordable rental housing, shelters, and shared equity homeownership, VHCB anticipates that these funds will be fully subscribed within the first 18 months of the grant period.

Established in 1987, VHCB remains the forerunner in the nation in pioneering a comprehensive approach to funding affordable housing and community development linked with land conservation and historic preservation. **Permanent affordability** is and has always been core to VHCB's approach, and to its funding commitments. With a cadre of nonprofit organizations working at the local level to identify and develop important projects in each community, the effects of 35 years of investment are discernible in every part of the state. VHCB has supported reinvestment in older housing in town and village centers, revitalizing downtown neighborhoods where residents can walk to services, and rebuilding a sense of community while spurring other private investment. VHCB invests in manufactured home communities throughout the state, recognizing that they are an essential source of affordable homeownership opportunities for low and moderate income Vermonters.

Since the passage of the Vermont Housing and Conservation Trust Fund Act in 1987, housing that is subsidized by the State of Vermont must be **permanently affordable to lower-income Vermonters**. This goal is generally enforced with a **housing subsidy covenant**, a deed restriction recorded in the land records and monitored by VHCB, and secured with a **mortgage deed**. Housing subsidy covenants ensure that the homes will be affordable to future generations and the value and effectiveness of the public's investment in these homes will be maintained in

perpetuity. Permanent affordability means that rental and homeownership units which receive VHCB funds will continue to be occupied affordably by lower income Vermonters.

Manufactured home communities who receive funding from VHCB agree to hold this real estate to provide affordable housing permanently for current and future homesite renters. To the extent that VHCB makes investments in individual homes, resale restrictions placed which ensure that public funds benefit multiple generations of homeowners and renters and that resale prices remain well below market value.

VHCB has assisted **54 manufactured home communities** around the state with costs associated with non-profit and cooperative acquisition, capital needs, and infrastructure. As a result of those investments, these communities are subject to permanent affordability restrictions. Of the 2,470 lots in these parks, 1,964 are permanently restricted, with 1,500 restricted at or below 80% of Area Median Income, and the remainder restricted to 100% of median income.

In just the last three years VHCB has invested in capital needs, non-profit and cooperative acquisition, and infrastructure in seven parks, five of which are now cooperatively owned. We continue to see a substantial demand for resources for critical infrastructure, and later in this application provide information from just two non-profit owners of affordable manufactured home communities with capital and infrastructure needs totaling well over \$15 million. We have also invested in 30 individual homes in mobile home communities around the state since 2020, creating permanently affordable rental options within affordable manufactured housing communities.

In 2019, VHCB, in partnership with other stakeholders, commissioned a Sustainability Assessment of Vermont's Affordable Mobile Home Communities (SUSTAINABILITY ASSESSMENT OF AFFORDABLE MOBILE HOME PARKS IN VERMONT) which concluded that:

- Only 25% of communities surveyed have both municipal water and sewer;
- At least 14 communities have “substantial capital improvements needed” to their drinking water, or wastewater systems, or roads;
- Fear of infrastructure failure (leaking distribution systems, failing pumps, aging septic systems) was the “primary source of anxiety for these operators”;
- There are at least five parks in the state in the 100 or 500 year floodplain;
- Ten parks around the state were identified as having capital improvement needs in the range of \$200,000 to \$3 million per community.

Three key recommendations of this report include:

- **Provide a competitive pool of technical assistance funding to help park owners navigate the increasingly complex process of financing a major capital project; and**
- **Low cost long term financing to cover acquisition and needed infrastructure improvements for affordable mobile home parks;**

- **Continue to provide leadership in advocating for the availability of federal and state sources of funding for larger capital needs projects, especially for preserving the sources of soft debt many of these projects require.**

VHCB's PRICE Main program will respond to these three recommendations, utilizing these new resources to address infrastructure and capital needs, and will use State of Vermont and HUD EDI funds to support technical assistance and the placement of individual homes.

While VHCB has in place the systems needed to deploy funding and the tools to ensure permanent affordability and preservation of Manufactured Home Communities as an affordable housing option for Vermonters, the demand far exceeds resources available (as state and federal pandemic funds are depleted) to meet the urgent needs of Manufactured Home Communities around the state. With \$15 million in PRICE funding, VHCB proposes to fund critical infrastructure needs at up to eight additional parks in Vermont, braiding this resource with state funds to provide technical assistance and HUD EDI funds to support replacement units. This application is being drafted in coordination with another application potentially benefiting Vermont and submitted by the Cooperative Development Institute. Should both applications be funded, VHCB will exclude the communities included in CDI's proposal from consideration for our funding, in accordance with the requirements outlined in the "Number of Applications" section located on page 24 of the NOFO, which prohibits multiple PRICE Program benefits to a single community.

Braiding PRICE Main funds with VHCB state dollars and a HUD EDI award, we will:

- Use VHCB state dollars to provide non-profit and cooperative owners with technical assistance, feasibility and planning funds – benefiting up to five parks;
- Use PRICE Funding to provide soft debt that will address water, waste water, critical infrastructure and capital needs in non-profit and cooperatively owned parks, ensuring that all parks funded are subject to a permanent Housing Subsidy Covenant which will be secured by a Mortgage Deed – benefiting an estimated eight parks statewide and 400 households initially. As a result of permanent affordability restrictions, this impact will be multiplied over time;
- Use HUD EDI funding to support energy efficient replacement homes, with a focus on Zero Energy Ready and Zero Energy Modular homes or other advanced manufactured homes designed to exceed current federally determined manufactured home energy standards – benefiting an estimated eight lot renters initially. These homes will be subject to individual Housing Subsidy Covenants ensuring that they remain affordable upon resale, magnifying the impact over time.

VHCB will utilize its existing competitive grant application process to deploy these funds.

As a state, Vermont has engaged in extensive stakeholder input, studies, and working groups to identify the needs of our affordable manufactured home communities. The findings of this research have been outlined in a number of sections of this application, and DHCD and VHCB's

PRICE Main application has been developed in direct response to those identified needs. VHCB is well positioned, with systems and policies already in place and a strong track record of assisting affordable manufactured home communities, to deploy PRICE Main resources to benefit low- and moderate-income Vermonters in affordable manufactured home communities. We appreciate the opportunity to submit this application and anticipate the ability to immediately begin implementation upon an award being approved.

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

The applicant, Vermont Department of Housing and Community Development, a State of Vermont government agency, has no charges, cause determinations, lawsuits, or letters of findings referenced in Section III D.1.a subparagraphs (1) – (5) of the NOFO that are not resolved. The applicant meets all of the eligible requirements outlined in the NOFO.

The applicant held a public hearing on May 16th, 2024 at 6 PM and has included information about this hearing in Attachment H (forthcoming).

As it relates to Section IIID(4)(1), This application is being submitted in coordination with an application from the Cooperative Development Institute. To the extent that both applications are awarded funding under this NOFO, in accordance with this guidance, neither application will benefit the same Mobile Home Community.

## Narrative Exhibit C: Need

### General Need for Affordable Housing in Vermont - A State of Crisis:

Vermont has a long-standing statewide lack of homes affordable to lower income households – a crisis that worsened during the COVID-19 pandemic. After decades of very slow growth, the rate of growth in new households doubled (Census 2020), increasing demand on an already constrained market. Vacancy rates have declined to record lows, with Vermont’s rental vacancy rate among the lowest in the country. The most populous area, Chittenden County, had a vacancy rate estimated at just 1% in 2023 (Allen, Brooks, Minor). As a result, Vermont now has the second highest rate of homelessness in the country.

Vermont’s supply challenges are attributable in large part to a long-standing decline in housing construction. Vermont Housing Finance Agency estimates that at least 24,000 additional Vermont homes will be needed by 2029 to meet demand and normalize vacancy rates. However, just 2,302 new units were built statewide in 2022 (U.S. Building Permits Survey). There is a shortage of 12,215 units available for low-income renters alone (NLIHC). A variety of factors, including permitting requirements, labor shortages, interest rates, and infrastructure limitations in our rural state help explain Vermont’s low building rate (Analysis of VT Affordable Rental Housing Development Cost Factors, 2019).

Vermont’s housing stock was further constrained by severe flooding in July 2023, during which FEMA estimates that at least 4,000 homes sustained damage. Many of Vermont’s historic town centers near waterways now risk frequent flooding due to climate change and an estimated 20% of all manufactured home communities have homes located in a floodplain, which will continue to place low-income households at risk.

The shortage of homes puts upward pressure on rental costs, with half of all Vermont renters cost-burdened and one-in-four severely cost-burdened, putting them at risk of eviction (2022 ACS). An estimated 69% of very low-income renters live in privately owned and managed apartments with no affordability restrictions. Even higher-income renters are experiencing the impact of a tight market, with the number of renters who can afford to purchase the median home dropping from 32% in 2021 to 6% in 2023, increasing competition for apartments (VHFA 2024).

High housing prices and low availability have left thousands of jobs across the state unfilled, including in the home construction and repair and social services sectors that are critical to addressing housing needs. Vermont’s unemployment rate of 2.2% is the third lowest nationally (U.S. Bureau of Labor Statistics, Dec 2023).

The rental shortage has contributed to a tripling of the number of Vermonters experiencing homelessness between 2019 and 2023 (VT PIT Count). Vermont’s per capita homelessness rate of 51 per 10,000 people is the second highest nationally (HUD 2023 Annual Homelessness Assessment). Non-white Vermonters are disproportionately likely to experience homelessness. While Black Vermonters represent 1% of the state population, they comprise 8% of those

experiencing homelessness (National Alliance to End Homelessness 2023). **Vermont also experienced the largest percentage increase in families with children experiencing homelessness during the pandemic**, increasing by 213% since the 2020 Point in Time Count and 36% between 2022 and 2023 alone (VT2023 Point In Time Count Report).

### **The Role, Need and Challenges of Vermont's Affordable MHCs:**

These challenges point to a crucial need to create more affordable housing, but just as importantly, to preserve Vermont's existing affordable housing. Vermont's Manufactured Home Communities (MHCs) are an essential housing resource in Vermont for seniors, low-income working families, and people with disabilities, and are a critical source of affordable housing in Vermont. Manufactured homes make up 6% of Vermont's housing stock. There are 20,041 manufactured homes in Vermont, with 7,000 located within manufactured home communities, which are defined in Vermont by two or more mobile homes sharing one piece of land. Residents of these communities – whether they are privately, cooperatively owned or owned by a non-profit organization – pay lot rent and 90% also own their home.

Home prices in Vermont have soared in recent years, and in 2023 the median sale price of a single family home jumped to \$310,000, an unprecedented increase of 15% from the previous year (VHFA). By contrast, the sale price for a manufactured home *without* land (i.e in a MHC) averaged a price of \$50,000 in 2023, providing **a source of affordable homeownership** which offers not only four walls and space, but also neighborhood and community (VHFA). Of the 230 mobile home communities registered in the state in 2023, over 60 are owned by a non-profit entity or by the residents as a cooperative comprising 3,440 lots. This equates to over 28% of Vermont's manufactured home parks and 49% of all manufactured home lots in the state (ACCD).

Both of these forms of ownership remove profit incentive for owning and operating a manufactured home community, which allows the owner – be it the residents or a cooperative – to set rents to meet the cost of operating the community and provide a built-in mechanism for mitigating large lot rent increases. While this element of continued affordability and resident voice in the decisions made about the community are critical to preserving these communities as affordable housing, often these communities come under non-profit or cooperative ownership with aged infrastructure that has been impacted by years of deferred maintenance. Many of Vermont's MHCs are over 50 years old and developed in the 1970s with very little environmental regulation or oversight. This has resulted in infrastructure systems that are not only aging, but that also lacked proper oversight when they were installed and do not meet today's standards (ACCT report).

As a funder with investments in over most of Vermont's non-profit and cooperatively owned communities, VHCB, in partnership with other stakeholders, commissioned a 2019 assessment which reviewed 52 parks (47 owned by non-profits and five owned by the residents as a cooperative) and resulted in the *Sustainability Assessment of Affordable Mobile Home Parks in Vermont* report, which described the vast needs of these communities:



- High rates of vacancy, uninhabitable lots, and abandoned or unmarketable older homes;
- **Lack of funds for small scale capital needs, including the cost of removing abandoned homes and/or bringing existing homes up to code;**
- Limited capital reserves to cover ongoing needs such as road maintenance and infrastructure upgrades;
- **Lack of capital for large scale repair and replacement projects, including drinking water and wastewater systems and roads;**
- **Limited/poor understanding of the capital needs for these systems, and a limited capacity to navigate complex financing to address these needs;**
- Threats to operational and financial sustainability are caused by low lot rents with limited capacity to increase them due to the very low income of residents and high debt service payments; and
- **Flood risk for the significant number of units currently located in flood erosion hazard or flood inundation areas.**

The communities in this report represented nearly 2,000 lots, or around a quarter of manufactured homes located in parks across the state, and 13 of 14 Vermont counties. The findings of this report confirmed the great need for investment in this sector: Just 14 out of the 51 manufactured home communities had an estimated \$8,397,000 in infrastructure needs alone – almost \$10 million in 2024 dollars.

Five years following the publication of this report, the need for low-cost funding to make these critical infrastructure upgrades continues. Without deep subsidies to accomplish these often multi-million dollar projects, the cost of these critical upgrades is passed on to the residents who take on the burden of additional debt through their monthly lot rents. In Vermont, 73.5% of the manufactured home community tenants have an income of 80% AMI or less. As these communities are primarily home to low-income populations and residents on fixed incomes, taking on additional debt to fund these projects is not feasible. 58% of the parks participating in 2018 carried \$5,000-\$10,000 of hard debt per unit, before addressing infrastructure projects (*Sustainability Assessment of Affordable Mobile Home Parks in Vermont*).

Communities tend to own their infrastructure systems outright. Municipal water served a little less than half of the communities surveyed, with 11 being connected to municipal water that flows into infrastructure owned wholly by the community; 19 operate their own wells. A majority of the communities utilize individual on-site community sewer systems (*Sustainability Assessment of Affordable Mobile Home Parks in Vermont*). Though it varies by community, keeping rents affordable also means that non-profit and cooperative communities are limited in the amount of funds they can allocate towards replacement reserves each year. While communities generally have reserves to cover small-scale capital projects such as removing trees or road maintenance, over the portfolio surveyed the average replacement reserves is \$565 per lot, or \$16,000 per community – far below what is needed to address the large-scale challenges facing these communities.

A park's financial wellbeing relies on success across a number of factors, including: rents that cover expenses; low vacancies; limited debt; efficient day to day management; and well-functioning road, water and sewer systems. Each of these factors is related, and well-functioning infrastructure systems are key – this report found through interviews with park owners that the fear of infrastructure failure was the primary source of anxiety for these operators due to the cost, complexities of major infrastructure projects, and immediate impact on residents.

Infrastructure failures aren't just a threat to affordability and financial stability of communities. They have the potential to pose health and safety risks as well as inconvenience to residents including threat of contamination, lack of access to potable water for an undetermined amount of time, road conditions that pose challenges for emergency vehicle access, and the potential for costly damage to appliances in homes.

In addition to the threat of infrastructure failures, Vermont's MHCs were largely developed before land use and environmental regulations and, as a result, in many cases they were developed on low-lying, flood prone land. This leaves them more susceptible to extreme weather events associated with climate change such as the 2011 and 2023 floods. Vermont has put together a Mobile Home Risk Assessment Tool to determine which communities are associated with a number of risks. According to this tool, 21 MHCs are in the 100-year floodplain, comprising 280 lots; 22 are in a 500-year flood zone or a Floodway, comprising nearly 500 lots (ACCD).

Large-scale infrastructure projects such as water and wastewater system upgrades present a capacity challenge for owners of these communities. Navigating the funding landscape and completing applications requires a certain skill set and capacity to accomplish, as does shepherding the project through the design, permitting, and construction phases. There is a need for funding to secure technical assistance and capacity to achieve these projects, and to support owners in developing a long-term plan for maintenance that takes these needs and their costs into account.

Pandemic-era federal funding has been made available to provide grants for critical infrastructure upgrades through Vermont's Agency of Natural Resources, and to support small-capital and infill needs through the Mobile Home Improvement and Repair Program (MHIP). These programs have made major investments in these historically disadvantaged communities. While these resources have had an impact, the unmet need for funding remains to address the myriad challenges facing Vermont's non-profit and cooperative communities, and for continued investment to maintain them as a source of permanently affordable housing available to low- and moderate-income Vermonters. For example, Vermont's Agency of Natural Resources (ANR), who administered the Healthy Homes program which provided grants to MHCs for infrastructure work like water and wastewater system upgrades, cites a remaining \$20 million unmet need from their applicants alone ranging from needs assessment, to technical assistance and permitting, to construction dollars.

## **Distress Criteria and Resilience Zones:**

Vermont contains four counties that meet distress criteria based on factors including median income and change in population, including Caledonia, Essex, Orleans, and Rutland. There are nine MHCs that would be eligible for this funding in those four counties. It is worth noting that while these four counties meet distress criteria, nine counties meet criteria for transitional counties, that have “recently suffered high rates of poverty, unemployment, or outmigration” or “are economically distressed and underdeveloped,” a majority under that designation due to AMI (NBRC). LMI Vermonters have been substantially impacted by the housing crisis, which is the result of rising housing costs and limited vacancies. As a critical source of housing for LMI Vermonters, investments in Vermont’s MHC directly benefit this population and ensure access to livable, affordable housing in a time of crisis.

Vermont has one Community Disaster Resilience Zone as defined by FEMA, which is in Barre, Washington County, Vermont. This is an area susceptible to flooding events. There is one, eight-lot community within that zone that could potentially be eligible for this funding.

Vermont has several legally protected classes that are not included in the FFHA, including marital status, age, sexual orientation, receipt of public assistance, and victims of abuse. MHCs are home to some of the most vulnerable in our communities, and when we work to preserve these communities as safe, stable and affordable housing we are directly impacting their quality of life. According to a 2011 study, 41% of MHC households reported a person with a health condition or disability that would be a concern in an emergency situation, and 32% of households were home to at least one retired senior (CDAE report). Vermont’s low vacancy rates coupled with high costs for both home rentals and purchase poses great threats to these populations, who tend to be of lower or fixed incomes – in 2021, 9% of Vermonters over the age of 65 lived below the poverty level (DAIL) and 43% percent of adults with a disability make less than \$25,000 (DOH). As 28.4% of all Vermonters are 60+, there will be a continued need to provide housing for this population. Nearly 64% of these oldest Vermonters own their homes.

## **Evidence of Acute Demand:**

As evidence of acute demand, in addition to the statewide data provided earlier in this narrative, we share more detail from two non-profit partners whose portfolios are comprised of a substantial number of affordable mobile home communities. Addison Housing Works (AHW) owns and manages nine parks with 340 lots in Addison County. The Housing Foundation Inc owns and/or manages 18 parks with more than 1000 lots around the state. Both entities have been leaders in collaborative efforts to understand the challenges facing mobile home communities around the state.

AHW anticipates bringing VHCB a proposal to support the most urgent infrastructure and capital needs - including water and waste water - in three of its parks as soon as PRICE funding is made available. They have been able to engage in planning and feasibility work across their manufactured home community portfolio with technical assistance support provided by VHCB. With a proposed scope for these three parks that includes sewer and water systems, storm water

treatment and related costs, AHW anticipates an ask to VHCB and the PRICE program for soft debt of **\$6.55 million to support the 128 lots in these 3 communities.**

Housing Foundation Inc., has identified four high-priority infrastructure projects – including water and wastewater – in parks that serve more than 300 low- and moderate-income Vermonters. In order to preserve affordability in these parks, they require soft debt to address water and wastewater needs with a gap in financing that exceeds **\$9 million**, and also anticipate seeking funding from VHCB’s PRICE program to help address the gap, potentially **benefiting more than 300 households initially.**

While VHCB will host a competitive application process, these two non-profit owners of affordable mobile home communities demonstrate examples of the immediate need for PRICE funding in Vermont’s MHCs, and represent just a fraction of the unmet need for this resource. These two owners demonstrate sufficient demand to utilize the entire proposed PRICE Program award on urgent priorities, thereby benefiting 428 households, and existing data, reports and information cited elsewhere in this narrative demonstrate that this is just a fraction of the existing need.

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## Narrative Exhibit D: Soundness of Approach

### i. Subfactor (b)(i): Project Description, Management, and Impact (10 points)

#### Vision & Goals, Eligible Activities:

VHCB's vision, scope and goals for the PRICE Main program funding involve braiding this new targeted resource with state and HUD EDI funds to address the infrastructure, technical assistance and replacement home needs described in the above section of this application, utilizing our existing systems, policies and mechanisms which ensure permanent affordability in Vermont's non-profit and cooperatively owned affordable manufactured home communities.

We propose to engage in the following eligible activities to address the needs outlined regarding Factor (a) of this indicator:

- Use \$125,000 in VHCB state dollars to provide non-profit and cooperative owners with technical assistance, feasibility and planning funds – benefiting up to five parks. VHCB has substantial experience and a longstanding track record in providing feasibility and technical assistance, with policies, procedures and systems already in place to begin this work immediately;
- Use PRICE Funding to provide soft debt that will address water, waste water, critical infrastructure and capital needs in non-profit and cooperatively owned parks, ensuring that all parks funded are subject to a permanent Housing Subsidy Covenant which will be secured by a Mortgage Deed – benefiting an estimated eight parks statewide with an estimated 400 lots. VHCB has 35 years of experience pairing federal and state resources with permanent affordability restrictions, with policies, procedures and systems already in place to begin this aspect of the PRICE implementation immediately;
- Use HUD EDI funding in these parks to support energy efficient replacement homes, with a focus on Zero Energy Ready and Zero Energy Modular homes or other advanced manufactured homes designed to exceed current federally determined manufactured home energy standards – benefiting an estimated ten homes. This is also an area of experience and existing capacity for VHCB - since January of 2020, VHCB has provided funding for 30 replacement homes in seven parks around the state.

Overall we anticipate a total of at least 400 initial beneficiaries, compounded substantially over time as a result of permanent affordability restrictions.

While all eligible applicants will be subject to VHCB's competitive application process, our vision for the use of this funding is informed by project data from nonprofit owners and managers of mobile home communities in Vermont, who have been able to quantify the need(s) in the communities they manage. The examples below come from our partner HFI, and are meant to be illustrative of projects that VHCB would consider for awards using PRICE funds. By making funding available for technical assistance and feasibility, VHCB also envisions being

able to support up to five communities in being able to provide this level of understanding around the needs, costs and impacts of challenges in their communities.

*Mountain View Court (Bennington, VT) - Estimated Cost: \$3,010,000*

Mountain View Court is a 20-lot mobile home park in Bennington owned by HFI. Built in 1962, with municipally connected wastewater and water the infrastructure has come to the end of its useful life. Regardless of the municipal connections, the community is responsible for the maintenance, repairs, and full replacement of the infrastructure within the community. The community's infrastructure comprises copper water lines and Orangeburg sewer lines, both with an expected lifespan of around 50 years. HFI applied to Healthy Homes for 75,000 for TA/Permitting for new water & wastewater distribution lines and was awarded \$26,250 to be used towards wastewater only.

Copper water lines are susceptible to corrosion, especially when the water supply falls below a pH level of 7. This corrosion can lead to pitting and, over time, pinhole leaks in the pipes. While water from corroded copper lines is generally safe to drink, it may develop a metallic taste and leave green or blue stains on fixtures like taps, sinks, showers, and toilets. Beyond these aesthetic concerns, elevated copper levels in drinking water can be harmful, potentially causing permanent kidney and liver damage, a particular concern for children and the elderly.

Orangeburg sewer lines, typically begin showing signs of deterioration after about 30 years, can become brittle and prone to penetration and breakage. The intrusion of tree roots is a common cause of damage to Orangeburg Pipe, sometimes leading to complete line collapse. This creates a significant risk, as any sewer leak can easily contaminate the drinking water system, posing a direct threat to residents' health and safety.

*Mobile Acres Mobile Home Park (Braintree, VT) - Estimated Cost: 2,550,000*

Built in 1969, Mobile Acres MHP, is a 95-lot park with private onsite water and wastewater. The community is served by two wells drilled in 1967 and 1971, with assumed distribution system installation within that timeframe. Well 1's pump was replaced in 2007, and well 2's pump in 2016, while chlorination systems were added in 2005. The distribution pipe consists of 2" galvanized iron pipes running beneath homes.

Until 2019, minimal improvements had been made to the water distribution systems, mainly involving patchwork replacements due to breakages or tuberculation issues. A project was initiated to begin replacing distribution lines in critical areas where residents had been enduring the worst of the conditions, including severe tuberculation and inadequate pressure during peak demand periods. New water lines for the rest of the community are still needed. Mobile Acres was awarded \$42,000 for a Water Infrastructure Needs Assessment which will be paid directly to Dubois & King as well as \$39,375 for water system engineering services for design and permitting.

The water operator reports that one of the two wells is very close to the main road (Route 12A) and would not pass today's setback requirements. The annual sampling has shown that Nitrate levels continue to rise in this community. Nitrates typically come from fertilizer or failing septic systems and although they have not been able to determine the cause of the elevating Nitrate levels, it is suspected to come from failing septic systems.

## **National Objectives:**

VHCB's proposal to use PRICE, State of Vermont and HUD EDI funds to make awards to Manufactured Home Communities (MHCs) to improve infrastructure and living conditions meets the National Objectives of the CDBG program.

- 1) This proposal benefits low- and moderate-income communities and ensures ongoing benefit to those communities through permanent affordability restrictions.
- 2) This proposal works to prevent or eliminate blight. The median home value in MHC's was \$20,080 in 2019 with 12 percent of homes valued at less than \$10,000. Replacing aging and unsafe homes would be an eligible activity and doing so will help to address blight in Vermont communities.
- 3) This proposal helps to address urgent community development needs. MHCs are a critical source of affordable housing across the state and especially in Vermont's rural communities. Historic under-investment in Vermont's MHC's has weakened park infrastructure and resulted in residents living in unsafe or energy inefficient homes, or in environmentally hazardous areas. This proposal seeks to increase the financial sustainability of MHC's and improve the quality of life for park residents.

## **Timeline**

With a track record, systems, an application process and timeline already in place, VHCB is ready to begin immediate implementation of the PRICE program upon an award being approved, and anticipates a timeline as follows:

October 2024 – Grant executed with HUD, applications solicited, ongoing outreach begins, immediate solicitation of requests for technical assistance and feasibility.

January 2025 – Funding Commitments begin to be made on a rolling basis, in accordance with established grant consideration timelines, which are posted publicly (<https://vhcb.org/about-us/board-meetings>), and updated at least annually.

VHCB will accept applications on a rolling basis, but anticipates that most if not all funds will be committed within the 18 months following execution of the grant agreement.

The activities proposed in this application are all either actively in development or actively proceeding (but lack funding). The activities proposed are highly ready to proceed “but for” access to funding. Both DHCD and VHCB are highly committed and have the staff capacity to meet the proposed timeline for implementation.

## **Budget**

The budget for the proposed PRICE Main activities are summarized below. Please see uploaded Form HUD-424cbw for additional information.

We anticipate using at least \$21.3 million in resources, with \$15 million in PRICE Main funding, to address infrastructure and capital needs in non-profit and cooperative mobile home communities.

Funds include:

- \$1,000,000 in HUD EDI funding leveraged by VHCB to support individual home installation
- \$125,000 in VHCB state matching funds to provide technical assistance to five non profit or cooperative park owners to support the capacity to create and sustain redevelopment plans
- \$4,500,000 in other anticipated leverage – VHCB prioritizes projects with leverage and based on our funding history this is a reasonable estimate of resources that applicants will bring to their proposals
- \$13,177,631 in PRICE funding to be used for capital and infrastructure projects in an estimated 8 parks.
- \$748,233 in match funds for administrative costs committed by DHCD

## **ii. Subfactor (b)(ii): Affordability and Equity (15 points)**

### **Ensuring affordable MH options for LMI Households**

This proposal will provide funding commitments to non-profit and cooperative communities that have limited access to capital, limited capacity to navigate complicated funding mechanisms, and who require soft debt to ensure that low- and moderate-income community members have access to housing that provides safe water, waste water, and other infrastructure systems, and that affordability is ensured through appropriately addressing capital needs.

Whereas for-profit park owners have an incentive to raise rents above community operational needs to turn a profit on the land, in cooperative and non-profit owned parks, profit above that which is needed for expenses is generally invested back into the community, and rents are set at levels that sustain the cost of operations and reserves. This is mechanism helps to ensure that residents are paying what is required to operate and sustain their community. This also means that there is limited room for building the reserves required to take on major infrastructure projects, which is where VHCB proposes to use this funding.

VHCB pairs its investment in these communities with a housing subsidy covenant and mortgage deed, making them permanently affordable and restricted to low-income households under a certain AMI threshold, generally 80% or lower. Since this restriction remains in perpetuity, that lot is essentially removed from the speculative market and can only be sold to a buyer that commits to the continuation of those income restrictions.

We know that manufactured homes provide long-term housing solutions, and that those households rely on long-term affordability. According to a 2011 VT MHP study, nearly 41% of



residents surveyed had lived in their current park for more than ten years, with more than half of those living in their current park for at least 20 years (26% of total respondents). When asked about their future plans, nearly half (47%) said that they saw themselves living in the park for at least the next five years. VHCB's mechanism of perpetual affordability, combined with the naturally occurring affordable housing that is facilitated by non-profit and cooperative ownership, promotes opportunities for long-term homeownership.

With the average sale price of a single family home in Vermont in 2023 at \$310,000, and the average home on a lot in a MHC selling for \$50,000, these are particularly affordable opportunities for LMI households, which also tend to correlate with high rates of BIPOC households, working families, the elderly, and those with disabilities.

Individual homes invested in through this initiative utilizing HUD EDI funds would offer affordability in two ways: first, each investment will be made subject to affordability restrictions secured with a housing subsidy covenant; second, by focusing on homes that exceed energy efficiency standards, the monthly cost of maintaining, heating and cooling homes will be lower for the individual homeowners.

### **Protections for Residents**

In Vermont's manufactured home communities, 90% of homes on lots are owned by residents and only 10% are owned and rented out by the park owner. This unique ownership structure can leave homeowners on leased land particularly vulnerable as they do not own the lot their home sits on outright. Vermont has a long history of supporting and protecting residents of manufactured housing communities. Vermont's Mobile Home Park Act (10 VSA Chapter 153) was established in the early 1970s, and has been amended several times since its inception largely through the efforts of resident organizing. This act governs the protections afforded to MH homesite renters, and in some cases, provides additional protections over and above Vermont's landlord-tenant law. These laws are intended to: prevent discrimination and ensure fair housing; promote transparency between owners and tenants; and provide protections to residents of manufactured home communities around resident organizing, evictions, park sales, and park closures.

Protections under these laws include, but are not limited to: (CVOEO):

- Mobile Home Community residents may only be evicted for non-payment of rent or a material lease violation which has occurred within 60 days of the proceedings. If the eviction is for non-payment of rent, VT law dictates a resident have 20 days to pay the rent they owe before moving forward in the eviction process;
- Leases must transparently include all rent and utilities, and other reasonable incidental service charges, if any; a reference to any rules and regulations of the park; the process for subletting the home; how much notice you must give before you end the lease; and a statement that the owner is complying with Vermont housing discrimination law;
- All lease terms have to be uniformly assessed, as a protection against discrimination;

- Lot rents can only be increased once in a 12-month period and must be approved by DHCD before being passed along to each resident of a community, with at least 60 days written notice;
- Residents may sell their homes, provided they provide notice in writing to the park owner, who has 21 days to approve or deny a potential buyer; park owners may also not prohibit the ability to sublet the home, if the potential subletter meets the uniform application requirements and criteria;
- 12 hour notice to enter a resident's lot, with certain expectations for repairs or other emergency circumstances;
- MHP residents are able to dispute any lot rent increases that meet a certain threshold through ACCD as a way to mitigate burdensome lot rent increases;
- Standards of habitability and tenant remedies for responding to owner non-compliance.

Vermont was one of the first states to enshrine MHC residents' right of first refusal into law with tenant opportunity to purchase legislation. This legislation requires that park owners notify residents of their intent to sell the community, and provides residents with a 45-day window to organize to purchase the community. If they wish to explore the option of resident-purchase, a park owner must halt sale proceedings for 120 days to allow the residents to further explore the option. 16 of VT's 230 parks have come under resident ownership using the right of first refusal legislation with support from the Cooperative Development Institute.

In other areas of the country, the closure of a park to sell for more lucrative development is a real threat to MHCs. Vermont has long-recognized this threat and has developed laws that govern the closure of a MHC (ACCD). This includes a required 18-month notice, except under extenuating circumstances such as a life safety issue, with oversight from ACCD and a requirement to provide a notice of sale - and therefore a resident opportunity to purchase – before closure (ACCD).

In VHCB's *Policy: Funding of Mobile Home Parks* used to guide funding decisions, VHCB prioritizes projects that would otherwise result in lot rent increases and that have a plan for maintaining affordability. VHCB also prioritizes funding projects that would otherwise lead to a park closure and generally contributes to the long-term quality of the community for residents.

VHCB's Housing Subsidy Covenant mechanism ensures affordability in these communities by restricting what an owner can charge for lot rent based on the area's AMI as defined by HUD, and what level of AMI a lot can be leased to. The threshold for LIH is 80% AMI or lower. This covenant is recorded as a deed on the whole community, restricting a certain number of lots ensuring that they remain affordable to serve low income households in perpetuity. This also provides an extra layer of protection for residents around park sales and closures, as any sale of lots restricted under VHCB covenant requires VHCB oversight and approval.

Vermont is fortunate to have tenant rights organizations and built in protections through the Department of Housing and Community Development that can provide resources and support to residents and owners of MHCs including, but not limited to:

*Champlain Valley Office of Economic Opportunity Mobile Home Program (CVOEO MHP)*

This statewide advocacy program is designed to: support both renters and park owners with education and training around resident rights under federal and state law; support residents in organizing to purchase their community, a resident association, or other purpose; and to refer and provide resources to residents. CVOEO is also home to the Fair Housing Project, which works to educate and eradicate housing discrimination in Vermont and advance housing opportunity and choice.

*ACCD MH Program*

ACCD is a program within VT's DHCD focusing solely on manufactured home communities. This program works with all models of ownership – private, non-profit, and cooperative – to provide resources and support to both owners and residents and have the authority to enforce the statutes governing mobile home parks at VSA Chapter 153 Title 10. This program provides oversight to lot rent increases, sets the percentage of lot rent increase that makes residents eligible to mediate a lot rent increase, and has to approve any lot rent increase notices. They also oversee and ensure park-owner compliance with sale and closure notices, and maintain Vermont's MHC registry, which publicly publishes lot rents, vacancies, and number of lots for each community in the state.

These initiatives and protections in the statute serve to protect renters and are rooted in the same values as the White House Blueprint for Renters Bill of Rights. These statutes are established to: ensure there is transparency about lease terms and remedies if an owner breaks those terms; provide protections for residents looking to organize; protect residents and prospective residents from discrimination; and establish minimum standards for habitability. All of these statutes are informed by and meet federal fair housing law. Our non-profit partners who own these communities have extensive experience in developing and managing non-profit multifamily and MHC housing, including familiarity with and an understanding of these regulations, and VHCB's supplemental application for federal funding sources requires that grantees discuss their mechanisms for compliance with fair housing and other applicable federal laws as part of our assessment around eligibility for funding.

Under this initiative, in the event that a home would need to be removed due to damage from or habitability concerns, our leveraged HUD EDI funding could be used to support the costs associated with a replacement home.

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

Applicants are encouraged through VHCB's application process to make available information, financial counseling and/or financing options to enhance the affordability and quality of homes in the proposed manufactured home park project. VHCB provides funding to and partners with Vermont's five NeighborWorks HomeOwnership Centers across the state. These centers not only provide resources and advocacy for low- to moderate-income homeowners or those seeking to purchase a home, but can also support MH owners to find resources for repairing, weatherizing, and making their homes more energy efficient (NeighborWorks Alliance of Vermont).

VHCB carefully considers quality of life factors when determining whether or not to fund a project. Typically prioritizing new housing developments – such as a new construction multi-family building – in downtowns, walkable to amenities like schools, grocery stores, and jobs. MHCs in Vermont were developed on land that was inexpensive to acquire, which often means that they are located in rural areas or on the outskirts of towns and cities. VHCB assesses need for funding based on key factors such as the income of the residents and the immediate impact of a project on residents, and applicants must demonstrate how their proposal will advance contributing quality of life factors like walkability and/or access to public transportation, aesthetic improvements, reduction of blight, and how it will incorporate universal design and accessibility.

With 43% of Vermonters with a disability making \$25,000 or less, MHCs are an attainable option for independent living and homeownership. 41% of households living in these communities reported a household member with a disability or health condition. This is a population particularly vulnerable to emergencies – such as problems with infrastructure – as they may not have the ability to leave the home to access critical needs including water elsewhere in the event of a failure. By addressing these long-standing issues in MHCs, we are helping to make communities livable for people with disabilities, and advancing opportunities for those who are most impacted by the hardships of infrastructure failure and weather events.

By providing funding for infrastructure upgrades – including to make infrastructure more resilient in flood-prone areas – we will build on our track record of creating opportunities in perpetually affordable, quality housing for low-income individuals. VHCB will require applicants to meet any applicable federal wage and employment standards during procurement of this project, and in accordance with VHCB's Procurement Policy, will require advertising bid opportunities to women and minority owned and Section 3 businesses. VHCB's Section 3 Plan applies to construction projects that receive \$200,000 or more in HUD funding. This Section 3 has been developed by VHCB to comply with other sources of federal funding received through HUD. Under this plan, contractors and subcontractors will complete a Section 3 Contractor Certification pledging to make best efforts to provide employment and training opportunities to Section 3 workers for housing and community development financial assistance. This plan also details how one can become a section 3 worker to benefit from this opportunity.

### **iii. Subfactor (b)(iii): Environment and Resilience (15 points)**

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

In 2013, DHCD published the *Report on the Viability and Disaster Resilience of Mobile Home Ownership and Parks*, which highlights the environmental challenges facing MHCs and a proposal for how to move forward to protect residents of these communities from natural disaster. This report was published following the devastation of Tropical Storm Irene in 2011, which impacted 17 MHCs across the state, destroying over 125 homes and resulting in two park closures. In 2023, MHCs were once again impacted by flooding, with four parks taking on substantial damage and loss of 50 MHs (ACCD).

A vast majority of Vermont's MHCs were developed in the 1970s, prior to many of the state's environmental and land-use regulations. Primarily developed by private entities who had an interest in keeping costs low, they were developed on affordable land, often in rural, low-lying and flood-prone areas. In addition, many of these communities were developed with inadequate systems for stormwater drainage, exacerbating complications from steep slopes and erosion. Residents of these communities are especially vulnerable to natural disasters, as they may also not have access to funding or resources to support disaster recovery (2013 report). As severe weather events continue and the impacts of climate change loom, mitigation of severe weather impacts will be a critical component to infrastructure in areas susceptible to them.

Following the 2011 flooding, ACCD began collecting community infrastructure and flood plain data from each registered MHC in Vermont and developed the MHP Risk Assessment Tool. This tool provides transparent information to the Vermont public – including potential buyers of homes in a MHC – about the hazards they may encounter in a given community. According to this tool, 21 MHCs are in the 100-year floodplain, comprising 280 lots; 22 are in a 500-year flood zone or a Floodway, comprising nearly 500 lots.

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

VHCB's *Policy: Funding Mobile Home Parks* requires applicants seeking funding for a MHC project document that units are not in a 100-year flood area, and if they are, provide a plan for mitigating flood risks. VHCB also requires that applicants are able to document that the community's infrastructure is adequate and sustainable, and if not, how proposed improvements will have that outcome. Owners can mitigate impacts of natural disaster, particularly flooding, by making investments in flood-resilient infrastructure in areas that carry particular risk. Examples of these investments include:

- Building up roads and bridges, and incorporating storm water management measures like culverts to support proper drainage;
- Dry flood-proofing measures to prevent floodwaters from entering water and wastewater systems;

- Infrastructure expansion and site development in areas of land that are outside of flood zone and ways;
- For homes that have experienced and/or are most at risk of flooding, removal and relocation;
- Natural measures such as restoring wetland and river corridors.

Infrastructure failures – whether due to old age or from natural disasters like flooding – pose significant threats to the health and safety of residents and the nearby environment. The failure of a septic system, for example, can often lead to wastewater – which has pathogens, bacteria and viruses that may cause illness – backing up into homes and to above-ground pooling, which can threaten the surrounding water supply. Vermont’s environmental regulation landscape has changed significantly since these systems were first established, and any major updates or repairs to water and wastewater systems funded through PRICE or any other source would require a permit through the Agency of Natural Resources in order to ensure they meet the current health, safety and environmental standards (ANR).

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

This proposal advances environmental justice by investing in mitigation measures that will minimize future impacts from climate change for those who otherwise would be most vulnerable. As a joint conservation and housing organization, VHCB works to ensure that the development we invest in is environmentally sustainable and aligned with best practices for land use. This means prioritizing investment in existing projects, especially those which include elements of climate change mitigation in the proposal. As a funder with investment in over 54 MHCs in the state, VHCB has an interest in ensuring that these communities remain affordable, healthy, and resilient.

VHCB will leverage \$1 million HUD EDI funds from our existing MHC funding program to support costs of replacement homes. We will prioritize Zero Energy Modular, Zero Energy Ready and other home types that exceed current energy standards, thereby offering access to energy efficiency features which are generally unaffordable for Vermonters of modest means.

VHCB and VHFA’s joint policy *Building Design Standards: Policy on Energy Efficiency, Health and Resiliency in Affordable Housing Design, Construction and Rehabilitation* provides criteria for underwriting housing projects to high standards of energy efficiency, health, and resiliency. This policy encourages, but is not limited to: the use of renewable energy on a community scale and for individual homes; to use Low Global Warming Potential materials and best practices wherever possible in the implementation of a project; to preserve existing trees and vegetation; and placing Zero Energy Ready and Zero Energy Modular homes or other advanced manufactured homes designed to exceed current federally determined manufactured home energy standards. These standards are in place to ensure that high-quality, affordable housing is made available with limited impacts to the environment.

#### **iv. Subfactor (b)(iv): Community Engagement (10 points)**

##### **How will you seek and encourage diverse stakeholder participation? How does your proposal align with existing community plans and policies?**

This application proposes using PRICE funding to serve non-profit and cooperatively owned communities that have mechanisms for engaging residents as stakeholders at the core of their models. By state statute, residents of a privately owned manufactured home community have a right to organize to determine feasibility to purchase the community and make a selection around ownership. These cooperatives typically are operated by boards that are exclusively residents, or majority coop residents with seats dedicated to members of the larger community. Non-profit owners are required to have resident participation on their boards, which creates a clear channel of communication and engagement between owner and resident.

DHCD and VHCBC are a part of several collaborative efforts that bring together stakeholders of MHCs to discuss issues. These include the Housing & Homelessness Alliance of Vermont (HHAV) Manufactured Housing Subcommittee, which meets regularly to discuss the landscape of MHCs in Vermont. This group actively works to seek solutions to the needs addressed in section a including funding opportunities and advocacy at the state level.

In 2023, Vermont's legislature established the MHC task force, which brings together CHDC, VHCBC, CVOEO, legislators, and MHC residents to study the current landscape of Vermont's MHCs including their needs; the scope of data available on these communities; examining the statutes that exist around MHs and where they can be improved; incorporation of modern construction in these communities with an eye towards energy efficiency; and how to bolster cooperative ownership efforts.

Investing in MHCs is a key component of Vermont's HUD consolidated plan – which was developed by DHCD with participation from VHCBC, and with a number of opportunities for public comment and stakeholder input. The plan establishes several goals to advance safe, stable and affordable housing in Vermont, including increasing the supply and quality of affordable housing. The preservation of Mobile Home Communities is a key strategy to meet this goal, including:

- Preserve existing affordable housing projects including mobile home parks, in a manner consistent with prudent investment criteria;
- Preserve existing mobile home parks, and relocate families and individuals displaced by mobile home park closure;
- Address habitability and infrastructure problems in mobile home parks;
- Develop, replace, or relocate mobile home parks and lots that are in flood hazard areas.

## Narrative Exhibit E: Capacity

### c. Factor (c): CAPACITY (Maximum 20 points)

**What is your experience using grant funds? What is your experience completing environmental reviews? Are you familiar with cross-cutting federal requirements?**

The Vermont Department of Housing and Community Development and the Vermont Housing and Conservation Board collectively have awarded and overseen well over \$1 billion in state, federal and philanthropic resources over the past four decades.

The grant and compliance activities for this award will be managed by the **Vermont Department of Housing and Community Development (DHCD)** staff who have a high level of prior experience with federal grants of this magnitude and complexity. The State of Vermont and its DHCD's staff have a long-standing, extremely successful history of managing CDBG of over \$450M since 1983 and the NSP1, NSP3, DR1, and DR2, and now CDBG-CV and RHP funds under Ann Karlene Kroll, Director of Federal Programs. This continuity of leadership is key to setting up a new Program and ensuring full compliance is met by all partners of the Consortium. Ms. Kroll brings to the table a deep breadth of knowledge of over three decades of experience with the CDBG regulations that PRICE is built upon. Additionally, the staff supporting the Administration of the PRICE program include a seasoned Environmental Officer and a number of other key experienced staff.

This Department also oversees Vermont's Analysis of Impediments to Fair Housing and its Consolidated Plan.

All other aspects of this award will be managed by the **Vermont Housing & Conservation Board**. As administrators of HOME, HTF, HUD EDI, Lead & Healthy Homes and other Federal Funding commitments, VHCB is also highly experienced in managing the complexities of federal and state grants. Additionally, we have administered state and federal grants which align with the goals of the PRICE program – providing funding for non-profit acquisition, rehabilitation and cooperative conversion in parks throughout Vermont, while permanently restricting and protecting the affordability of these 54 communities in the process.

Since its inception 35 years ago, VHCB has administered and deployed more than \$977 million in funds in nearly every community in the state, representing 7600 awards we have made across all of our housing and conservation programs. This funding reflects more than 120 different sources – state, federal and philanthropic.

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

As a statewide funder of affordable housing for more than 35 years, with a demonstrated track record of funding new construction, rehabilitation, acquisition and cooperative conversion of affordable housing across the state of Vermont - including mobile home communities, VHCB is uniquely suited to quickly and efficiently implement and manage the PRICE program for



maximum impact. VHCB administers a number of state and federal funding sources, and has experience braiding multiple sources into projects for maximum impact.

VHCB manages state of Vermont funds, HOME, HTF, HUD EDI, CRF, and ARPA SFR funding, each of which have their own unique compliance and eligibility requirements. VHCB has a housing staff of 12, three of whom are devoted primarily to federal resources.

With DHCD performing an oversight role and managing the environmental review process for us, we are confident in our capacity to implement the PRICE program in Vermont.

Just since January of 2020, VHCB has utilized more than 22 state and federal funding sources to award capital to projects benefiting 2,000 permanently affordable rental units around the state, as well as seven manufactured home communities, and has managed compliance and affordability restrictions for each of these initiatives.

With an experienced team of underwriters, grant administration, finance and monitoring staff, we have the capacity to administer PRICE funding in a manner that promptly moves this resource out into Vermont's communities to the benefit of low and moderate income Vermonters.

**Provide at least one example of your experience managing similar projects and and expending grant funds (ideally, but not necessarily, federal grant funds such as CDBG, NSP, CDBG-DR, HOME):**

Two recent examples include:

**Example #1, the recently completed Firehouse Apartments in Bristol, Vermont utilizing HOME Investment Partnerships and ARPA SFR Funding:**

Working together, Addison Housing Works and Evernorth, a housing nonprofit serving northern New England, created 20 new solar-powered mixed-income apartment homes next door to a business incubator park, a short walk from jobs and shopping in Bristol's business district. VHCB contributed over \$3 million, including \$1.4 million in federal COVID-relief money and \$520,000 from the HOME Investment Partnerships Program. Other funding came from the NBT Bank and Efficiency Vermont, plus a Vermont Community Development block grant through the Town of Bristol. With its low-profile neighborhood-style design, green space, and nearby trail network, the Firehouse complex has one-, two- and three-bedroom apartments that are powered by photovoltaic solar panels and built to Enterprise Green Communities standards for affordable housing. A quarter of the new households are families with children, one-third are elders, and one-fifth were unhoused before moving in. Three-quarters of the units are for low-income residents, the rest for those earning up to 120% of area median income. Residents who previously experienced homelessness can receive support services through a partnership with the county nonprofit John Graham Housing and Services. Because of the variety of funding sources involved, including COVID-relief funds, the regulatory compliance and oversight of this project included both the traditional requirements related to income and affordability restrictions, but also to the provision of appropriate services for new tenants.

## **Example #2, Tri-Park Mobile Home Cooperative, Brattleboro, Vermont**

Tri-Park is a resident owned mobile home cooperative located in Brattleboro, Vermont which currently has 296 occupied lots throughout three locations. VHCB has been working with the resident run board of Tri-Park since 2013 and have provided two project capacity awards to support them in applying for funding to address infrastructure issues identified in their Master Plan and spread throughout their three communities. The infrastructure work includes replacing two septic systems, two bridges and creating infill lots within one community which will allow residents who choose to participate to relocate out of the flood plain.

The Cooperative has secured a variety of funding sources, including Healthy Homes ARPA funds for the replacement of sewer systems, and seven different sources for the infill and relocation portion of the project. These sources include a HUD EDI award, permanent debt, ARPA SFR and State General funds from VHCB, Flood Resilient Communities Funds from Vermont Emergency Management, Vermont Homeowner Tax Credits, CDBG funds and Community Recovery and Revitalization funds. The Cooperative has also negotiated with the Town of Brattleboro for them to eventually take ownership of two failing bridges which provide access to Mountain Home Park and Deepwoods Mobile Home Park, which is not part of the Cooperative but shares access points.

VHCB has supported the Cooperative over the past ten years as they have moved through a number of changes in their board. We convene a monthly funders meeting and also make sure that we are available to attend resident meetings and help inform participants regarding the sources of funds and the requirements of each. This large-scale project is now underway, with an anticipated completion date of 2026.

**Who are your key staff? List key staff from your organization who will be responsible for project leadership, management, and implementation.**

**Key staff from DHCD include:**

Ann Karlene Kroll, DHCD Federal Programs Director

Maxwell Krieger, Department General Counsel

Shaun Gilpin, Housing Director

Grace Vinson, Environmental Officer

Gretel St. Lawrence, Environmental Specialist

Cindy Blondin, Grants Management Analyst

Juliann Sherman, Grants Management Specialist

Brett Chornyak, Grants Management Specialist

Patrick Scheld, Administrative Services Manager II

DHCD will be responsible for grant oversight and administration, and will manage the environmental review process for all awards.

**Key Staff from VHCB Include:**

Gus Seeling, Executive Director

Elizabeth Egan, General Counsel

Anne Duffy, Chief Financial Officer

John Grosvenor, Finance Director

Jenny Hyslop, Housing Director

Emily Phillips, Associate Director of Housing

Elise Greaves, Housing Stewardship Coordinator

Marcy Christian, Grants Coordinator

Ron Rupp, Federal Housing Program Director

Greta Aiken, Federal Housing Programs Manager

Tyler Strange, Leah Sare, Lee Youngman and Kate Buonanno, Housing Analysts

VHCB staff will be responsible for implementation, outreach, individual awards, tracking, compliance and long term stewardship of the investments made under this initiative.

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

When VHCB makes funding commitments to partners, awards are made subject to a set of standard and special conditions which ensure accountability as it relates to project implementation and timelines. Our Housing Analyst team is responsible for ensuring that projects proceed in accordance with the timelines and conditions outlined in our awards. In the event of gaps in funding, all of Vermont's statewide funders meet regularly to review the pipeline of projects and to coordinate on planning for and responding to funding gaps.

VHCB's funding mechanisms include a contingency pool of funds that we hold back from project commitments in the event that funded projects experience cost overruns which create

gaps in the capital stack required to complete the project, which we have found during the pandemic was of major assistance in preventing project slow-downs in a volatile construction market.

We also formally monitor our funded project pipeline to ensure that performance benchmarks are being met as they proceed toward construction closing, and also after closing and throughout the construction process.

On the VHCB housing team, we have multiple staff who are cross trained to perform each core function of program implementation oversight, and thus an instance of turnover on our staff would not result in a threat to the timely implementation of the PRICE program.

Organization Chart

Organization	Key PRICE activity leaders	Role
VT Dept of Housing & Community Development (DHCD)*	Leadership Team includes Ann Karlene Kroll, DHCD Federal Programs Director; Maxwell Krieger, Department General Counsel; Shaun Gilpin, Housing Director	Applicant and federal award manager
Vermont Housing & Conservation Board	Leadership Team includes Gus Seeling, Executive Director; Elizabeth Egan, General Counsel; Anne Duffy, Chief Financial Officer; Jenny Hyslop, Housing Director; Emily Phillips, Associate Director of Housing; Ron Rupp, Federal Housing Program Director	Sub recipient and implementer of the PRICE program, responsible for marketing, implementation, and ongoing monitoring of affordability and income restrictions

**What is your experience promoting racial equity? Describe your experience working directly with underserved communities, particularly Black and Brown communities, to design or operate programs that equitably benefit such groups, or experience successfully advancing racial equity in other ways.**

Throughout its history, VHCB’s work has been invested in ensuring that underserved communities have lasting and sustainable access to Vermont’s resources. Most recently, our work as it relates to BIPOC Vermonters includes:

- As the administrative home of the Land Access and Opportunity Board, which was established by the Vermont General Assembly to promote racial and social equity in land access and home ownership, we have supported the creation of the Board, helping to

obtain an initial \$200,000 appropriation. The Board consists of 12 members all with lived experience representing marginalized Vermonters including those of BIPOOC backgrounds, the disability community and the LGBTQ community. We worked closely with them in completing a “Sunrise Report” to the General Assembly. This report addresses the legal, constitutional, and governance questions relevant to the functions of the Board, including grant making and how to fund, organize and structure the Board as they seek to one day become an independent entity. This report was successful in that the General assembly responded with an initial appropriation of \$1.2 million. VHCB staff provided administrative support for these efforts and worked closely with the board and legislative leadership to secure an ongoing commitment to advance equity in land and housing.

- In addition to providing grants for development capital, VHCB also provides operating support to a statewide network of non-profit developers and managers of permanently affordable housing. We annually underwrite the operations of these organizations, and provide our funding subject to conditions which include that each organization must have a board-approved action plan to remove barriers to equal access in their housing programs.
- We provide technical assistance to support BIPOC access to homeownership, having recently recommended funding for outreach and marketing of a homeownership program which will provide up to \$25,000 per household in down payment assistance to BIPOC homebuyers.
- As a statewide convener, VHCB also sponsors and supports educational and training initiatives, such as the recent year-long series “The Vermont Racial Justice Housing Jam”, a yearlong initiative examining how racial inequities impact Vermonters access to housing. In our conservation work, we engaged in a similar initiative “Conservation Leaders in Solidarity”, an equity learning journey for the leadership of Vermont conservation and environmental organizations.

## Narrative Exhibit F: Leverage

### V.A.1.d. (PAGE 55) - LEVERAGE - 5 Points

#### Sources and amounts of leverage

VHCB has committed to providing \$1.125 million in leverage to this application to maximize its effectiveness and ability to meet the pressing need of Vermont's MHCs. A formal leverage commitment from VHCB's Executive Director Gus Seelig which is included in Attachment F of this application.

The funds will be leveraged as follows:

- \$125,000 of VHCB-administered state funds to provide non-profit and cooperative owners with technical assistance, feasibility and planning funds. VHCB has substantial experience providing feasibility and technical assistance, with policies, procedures and systems already in place to begin this work immediately.
- \$1 million of HUD-EDI funding to support energy efficient replacement manufactured homes, with a focus on Zero Energy Ready and Zero Energy Modular homes or other advanced manufactured homes designed to exceed current federal energy standards.

While we understand that HUD's scoring criteria precludes this from being considered in the scoring process, our budget does also include additional leverage that is estimated very conservatively based on our track record of funding leveraged projects. VHCB has a demonstrated track record of advancing projects with leverage; in our most recent seven MHC awards for community infrastructure and acquisition, our total investment of \$5,591,632 leveraged over \$25MM in additional funding for those communities.

#### Risks & Contingency

This proposal can be scaled based on the amount of funding awarded. Should VHCB not receive all of the 15MM award proposed through the PRICE program, our intention is to undertake the same activities at a smaller scale and work with partners in this space to prioritize according to urgency.

VHCB works closely with and provides operating capacity to Vermont's non-profit housing network, most of which own and operate MHCs. The organizations that make up this network have substantial knowledge and expertise around the needs and potential solutions for MHCs and a demonstrated willingness to permanently steward these investments. We have the partnerships and mechanisms in place to provide this funding effectively to scale.

## Narrative Exhibit G: Long-Term Effect

**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?**

VHCB's proposal for use of PRICE funding is based on the following needs, as outlined in Section A of this application:

- Capacity and expertise to navigate the complexity of infrastructure projects;
  - Updated capital and infrastructure systems that will:
    - secure the health, safety and financial wellbeing of MHCs;
    - be resilient to flooding and other natural disasters;
  - Flood mitigation measures which may include building resilient infrastructure systems or removing/relocating homes from a flood plain;
  - The need for funding by no-or-low-cost capital, as incomes would not support increased lot rents to carry debt to finance these projects;
  - Ongoing affordability of these communities, as critical sources of housing for low-to-moderate income Vermonters;
  - Replacement homes which exceed current energy efficiency standards.
- 
- As a statewide funder of affordable housing for more than 35 years, with a demonstrated track record of funding new construction, rehabilitation, acquisition and cooperative conversion of affordable housing across the state of Vermont - including mobile home communities, VHCB is uniquely suited to quickly and efficiently implement and manage the PRICE program for maximum impact. VHCB will use the PRICE program to continue to meet the needs of Vermont's MHCs by: Using state dollars to provide up to eight non-profit and cooperative communities with technical assistance, feasibility and planning funds;
  - Using PRICE Funding to provide soft debt that will address water, waste water, critical infrastructure and capital needs in non-profit and cooperatively owned parks, ensuring that all parks funded are subject to a permanent Housing Subsidy Covenant which will be secured by a Mortgage Deed – benefiting an estimated eight parks statewide and 400 households initially. As a result of permanent affordability restrictions, this impact will be multiplied over time;

Using HUD EDI funding to support energy efficient replacement homes, with a focus on Zero Energy Ready and Zero Energy Modular homes or other advanced manufactured homes designed to exceed current federally determined manufactured home energy standards – benefiting an estimated eight lot renters initially. These homes will be subject to individual

Housing Subsidy Covenants ensuring that they remain affordable upon resale, magnifying the impact over time.

Mobile Home Communities are not only a source of affordable housing, but of affordable homeownership. As home prices and interest rates have risen and continue to rise, homeownership is out of reach for many in VT's communities. For those for whom ownership may be out of reach – including working families, those with disabilities, or seniors – MHCs remain an affordable and accessible option for ownership.

VHCB's model is rooted in the core value of permanent affordability. With each investment in a MHC, lots in a community are restricted to households by Area Median Income. This is accomplished by placing a permanent covenant and deed on the entire property, which is legally enforceable, stays with the property, and ensures that VHCB is part of the decision making process around any proposed future use. In its 35 years of operation, VHCB has assisted **54 manufactured home communities** around the state with costs associated with non-profit and cooperative acquisition, capital needs, and infrastructure. As a result of those investments, these 54 manufactured home communities are subject to permanent affordability restrictions. Of the 2,470 lots in these parks, 1,964 are permanently restricted, with 1,500 restricted at or below 80% of Area Median Income, and the remainder restricted to 100% of median income.

When VHCB makes an investment, we want to be sure that the housing it supports remains not only affordable, but also dignified, safe, and sustaining. All of the projects we underwrite must present a plan for ensuring their project can deliver permanent affordability and maintain good physical condition, assessed by a formal, third party Capital Needs Assessment. Developing a Capital Needs Assessment following the completion of a project provides critical insight to regular maintenance and replacement needs, including a schedule and projected costs. This information allows owners to account for regular maintenance and improvements in their annual operating and capital expense budgets, allowing for more time to save and/or to seek additional funding to complete a project.

A key component of our focus on permanent affordability is stewardship and monitoring. All of our investments come with reporting requirements that allow us to assess where they may require additional support in the future. We monitor projects to determine compliance with the housing subsidy covenant; to ensure that the project is meeting VHCB's minimum requirement for replacement reserve contributions annually; to give an opportunity for the owner to provide any feedback or challenges they are experiencing; and to collect and review an updated Capital Needs Assessment as required.

By connecting an investment in a community infrastructure – mitigating future environmental risks, ensuring that systems are safe and up to code – with a permanent covenant on the community, VHCB is well positioned to ensure that future buyers of a home are low-to-moderate



income individuals and that a community is healthy and safe with a plan for addressing future capital needs before they become a threat to safety and habitability.

DRAFT

## Advancing Racial Equity (Attachment A)

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In accordance with the PRICE NOFO, we submit the following data regarding barriers, sourced from Vermont's Consolidated Plan:

- Racial and ethnic minority groups represent 3.5% of the total number of Vermont households, with nearly 95% of Vermont households identifying as “white alone”.
- Black Vermonters tend to be disproportionately represented in Vermont's homeless population, making up 1% of Vermont's total population and 6% of those who are homeless (VHFA).
- Black/African American households are shown to have a disproportionately greater instance of housing problems in the low- (30-50% AMI) and middle- (80-100% AMI) income categories, including 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%.
- In the 30-50% of Area Median Income category, it was found that 74.8% of all households reported having a housing problem. Within this category, 100% of Black/African American households, 85.6% (380 out of 444) of Asian households, and 89.7% (105 out of 117) of American Indian, Alaskan Native households were found to have a housing problem, representing a disproportionate number of said households compared to the whole. This trend of disproportionate impacts carries for non-white Vermonters in all AMI categories surveyed, from 0-100%.

We know that rates of homeownership tend to be lower for POC, 72% of whom rent their housing and 28% that own. This is nearly an inverse of white Vermonters, 26% of whom rent their housing and 74% that own. They are also more likely to rely on public transportation and walkability than white folks, who tend to have access to a vehicle and/or are more likely to WFH (2021 VT REAP Report).

### **Key Barriers include:**

- Lack of generational wealth and low incomes that cannot support the capital required up front to purchase a home in traditional markets;
- Lack of quality housing and the general need for rehabilitation of units and new construction with high-functioning, energy efficient utilities and appliances;
- Low incomes and high rental costs, general housing crisis of affordability and availability.

VHCB funds projects specifically that will advance equity in perpetually affordable housing, prioritizing projects along traditional settlement patterns to ensure accessibility and walkability to jobs and essential services and bolstering efforts to reduce barriers to BIPOC homeownership. We know that our funding supports the creation of housing that directly benefits BIPOC Vermonters. VHCBs portfolio wide demographic data collection showed that BIPOC Vermonters were head of household in 9% of the rental projects we have funded, and 10% head of household for our funding in homeownership units.

VHCB works to advance equity and eliminate barriers to equity in housing opportunity in the following ways:

- As the administrative home of the Land Access and Opportunity Board, which was established by the Vermont General Assembly to promote racial and social equity in land access and home ownership, we have supported the creation of the Board, helping to obtain an initial \$200,000 appropriation. The Board consists of 12 members all with lived experience representing marginalized Vermonters including those of BIPOOC backgrounds, the disability community and the LGBTQ community. We worked closely with them in completing a “Sunrise Report” to the General Assembly. This report addresses the legal, constitutional, and governance questions relevant to the functions of the Board, including grant making and how to fund, organize and structure the Board as they seek to one day become an independent entity. This report was successful in that the General assembly responded with an initial appropriation of \$1.2 million. VHCB staff provided administrative support for these efforts and worked closely with the board and legislative leadership to secure an ongoing commitment to advance equity in land and housing.
- In addition to providing grants for development capital, VHCB also provides operating support to a statewide network of non-profit developers and managers of permanently affordable housing. We annually underwrite the operations of these organizations, and provide our funding subject to conditions which include that each organization must have a board-approved action plan to remove barriers to equal access in their housing programs.
- We provide technical assistance to support BIPOC access to homeownership, having recently recommended funding for outreach and marketing of a homeownership program which will provide up to \$25,000 per household in down payment assistance to BIPOC homebuyers.
- As a statewide convener, VHCB also sponsors and supports educational and training initiatives, such as the recent yearlong series “The Vermont Racial Justice Housing Jam”, a yearlong initiative examining how racial inequities impact Vermonters access to housing. In our conservation work, we engaged in a similar initiative “Conservation Leaders in Solidarity”, an equity learning journey for the leadership of Vermont conservation and environmental organizations.

As we implement the PRICE program in Vermont, we will consult with the Land Access and Opportunity Board to ensure that our implementation plan fully addresses any potential barriers to accessing this housing.

## **Affirmative Marketing (Attachment B)**

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This proposal would utilize PRICE funding to serve Vermont's MHCs, which are home to some of the most vulnerable Vermonters, including LMI individuals, people with disabilities, working families, and the elderly.

All funds will be awarded through a competitive application process administered by VHCB. Eligible applicants will include non-profit housing organizations and cooperative mobile home communities. In Vermont, these organizations primarily serve these vulnerable populations, and work closely with service providers and agencies in their local area to market their housing communities.

VHCB will require, as a component of the application process, that each applicant provide a written plan describing how they will affirmatively market the community to Black and Brown persons or communities, individuals with limited English proficiency, individuals with disabilities, or families with children. The plan may include such activities as outreach through community contacts or service providers or at community centers serving the target population; and marketing on websites, social media channels, television, radio, and print media serving local members of the targeted group.

## Affirmatively Furthering Fair Housing (Attachment C)

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There are several protected classes in Vermont, which encompass all of the legally protected classes that are included FFHA as well as marital status, age, sexual orientation, receipt of public assistance, and victims of abuse. VHCB provides operating support to and works closely with affordable housing non-profit organizations across the state that develop and manage affordable housing. These organizations must demonstrate, as part of our annual underwriting process for operating capacity grants - that these organizations have a plan for following and enforcing civil rights laws, and must disclose if they have received fair housing complaints.

As administrators of HOME and HTF funding, our competitive funding applications take into account if anyone has fair housing complaints as part of underwriting consideration. Those who apply for federal funding from VHCB must agree to comply with a series of federal regulations and requirements, including the FFHA, and must describe how their organization is affirmatively furthering fair housing by answering the following:

- Are there ways in which this project goes beyond the minimum fair housing requirements in order to help reverse patterns of economic and/or racial segregation and inequality and achieve full equal housing opportunity?
- Is this project located in an area of racial or ethnic minority concentration (defined in the state's Analysis of Impediments to Fair Housing Choice (AI) as an area where the presence of a minority is more than twice the presence in the state as a whole)?
- Is this project located in an area of low-income concentration (defined in the AI as an area where 51% or more of the households are at or below 80% of area median income)?
- If the proposed project is located in an area with a concentration of racial or ethnic minorities and/or poverty, how will the housing contribute to the revitalization of a disinvested community, or help prevent displacement of residents living in neighborhoods on the verge of or already undergoing gentrification?

Finally, VHCB provides capacity funds to programs that are advancing access to affordable homeownership. The Champlain Housing Trust, for example, receives both operating support and program support for their Shared Equity programming that subsidizes the cost of homeownership by purchasing and removing homes from the speculative market. CHT has recently launched a new Homeowner Equity Program to remove barriers to homeownership for BIPOC Vermonters, who are three times less likely to own a home than white Vermonters. This program includes supports like down payment assistance, education and counseling, and advocacy, and support with repairs and replacements of old systems within the home.

## **Eligible Applicants documentation (Attachment D)**

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The Department of Housing and Community Development certifies the following:

- There are no civil rights matters pending, and the application has none of the charges, cause determinations, lawsuits, or letters of findings referenced in subparagraphs (1) – (5)
- The applicant is a state entity and therefore an eligible entity in accordance with this NOFO, and has provided a Certification for State Applicants in Attachment G.
- A partnership letter of intent on behalf of VHCB has been included as Attachment E.
- The applicant is submitting only one application under this NOFO.



April 25<sup>th</sup>, 2024

Vermont Housing & Conservation Board  
58 East State Street, Montpelier, VT 05602

**Re: Intent to Participate**

This letter is to confirm the mutual intent of both Vermont Housing & Conservation Board and Vermont Department of Housing and Community Development to collaborate and enter into a partner agreement [or other agreement], contingent upon the award of funds from the United States Department of Housing and Urban Development for the Community Development Block Grant Preservation and Reinvestment Initiative for Community Enhancement (CDBG-PRICE) competition, to carry out eligible activities as provided in the Vermont Department of Housing and Community Development's CDBG-PRICE application.

**Vermont Housing & Conservation Board (VHCB):** Established in 1987, VHCB remains the forerunner in the nation in pioneering a comprehensive approach to funding affordable housing and community development linked with land conservation and historic preservation. Since its inception 35 years ago, VHCB has administered and deployed more than \$977 million in funds in nearly every community in the state, representing 7600 awards made across housing and conservation programs.

Permanent affordability is and has always been core to VHCB's approach, and to its funding commitments. With a cadre of nonprofit organizations working at the local level to identify and develop important projects in each community, VHCB has supported reinvestment in older housing in town and village centers, revitalizing downtown neighborhoods where residents can walk to services, and rebuilding a sense of community while spurring other private investment. VHCB invests in manufactured home communities throughout the state, recognizing that they are an essential source of affordable homeownership opportunities for low and moderate income Vermonters.

As administrators of HOME, HTF, HUD EDI, Lead & Healthy Homes and other Federal Funding commitments, VHCB is also highly experienced in managing the complexities of federal and state grants. Additionally, VHCB has administered state and federal grants which align with the goals of the PRICE program – providing funding for non-profit acquisition, rehabilitation and cooperative conversion in parks throughout Vermont, while permanently restricting and protecting the affordability of these 54 communities in the process.

VHCB will be a subrecipient of funds awarded to the Department of Housing and Community Development through the CDBG-PRICE program and will be responsible for the implementation of the activities outlined in the proposal. These include managing the process of deploying funding to eligible applicants such as soliciting, reviewing, and making determinations on applications received as part of the competitive award process; entering into grant agreements, disbursing funds, and tracking project status; and monitoring and ongoing communication with grantee.

It is understood that this is letter is only an expression of our intent and a binding partner agreement [or other agreement] detailing the terms and conditions of the proposed partnership must be executed before the use of any CDBG-PRICE funds, if awarded.

Sincerely,



Gustave Seelig  
Executive Director  
Vermont Housing & Conservation Board

---

**VERMONT HOUSING & CONSERVATION BOARD**

58 East State Street, Montpelier, Vermont 05602 | (802) 828-3250 | [vhcb.org](http://vhcb.org)



**BOARD OF DIRECTORS:** David R. Marvin, Chair • Neil Mickenberg, Vice Chair • Maura Collins • Clarence Davis  
Ann Fielder • Kate McCarthy • Julie Moore • Amy Richardson • Jenney Samuelson • Anson Tebbetts • Emily Wadhams

**EXECUTIVE DIRECTOR:** Gustave Seelig





April 23, 2024

U.S. Department of Housing & Urban Development  
Washington, DC

Re: Commitment of Leverage for PRICE Application

To Whom It May Concern:

In support of the State of Vermont's PRICE application I am pleased to commit the following resources as leverage to maximize the effectiveness of the proposed program.

- \$125,000 of VHCB-administered state funds to provide non-profit and cooperative owners with technical assistance, feasibility and planning funds. VHCB has substantial experience providing feasibility and technical assistance, with policies, procedures and systems already in place to begin this work immediately.
- \$1 million of HUD-EDI funding to support energy efficient replacement manufactured homes, with a focus on Zero Energy Ready and Zero Energy Modular homes or other advanced manufactured homes designed to exceed current federal energy standards.

We look forward to working with HUD to successfully administer this program should our application be successful.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gus Seelig", is written over a light blue horizontal line.

Gus Seelig  
Executive Director

---

**VERMONT HOUSING & CONSERVATION BOARD**

58 East State Street, Montpelier, Vermont 05602 | (802) 828-3250 | [vhcb.org](http://vhcb.org)



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Ann Fielder • Kate McCarthy • Julie Moore • Amy Richardson • Jenney Samuelson • Anson Tebbetts • Emily Wadhams

**EXECUTIVE DIRECTOR:** Gustave Seelig

## **Certifications and Forms (Attachment G)**

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### Included in the following order:

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-424B)

Assurances for Construction Programs (SF-424D)

PRICE Certification

### Application for Federal Assistance SF-424

**\* 1. Type of Submission:**

- Preapplication  
 Application  
 Changed/Corrected Application

**\* 2. Type of Application:**

- New  
 Continuation  
 Revision

\* If Revision, select appropriate letter(s):

\* Other (Specify):

\* 3. Date Received:

Completed by Grants.gov upon submission.

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

**State Use Only:**

6. Date Received by State:

7. State Application Identifier:

**8. APPLICANT INFORMATION:**

\* a. Legal Name:

State of Vermont, Agency of Commerce and Community Development

\* b. Employer/Taxpayer Identification Number (EIN/TIN):

03-000264

\* c. UEI:

WNDAAUB5HAW1

**d. Address:**

\* Street1:

One National Life Drive, Deane C. Davis Bldg., Sixth Floor

Street2:

\* City:

Montpelier

County/Parish:

\* State:

Vermont Housing and Conservation Board, subrecipient

Province:

\* Country:

USA: UNITED STATES

\* Zip / Postal Code:

05620-0501

**e. Organizational Unit:**

Department Name:

Division Name:

**f. Name and contact information of person to be contacted on matters involving this application:**

Prefix:

\* First Name:

Ann

Middle Name:

Ann Karlene Kroll

\* Last Name:

Kroll

Suffix:

Title:

DHCD Federal Programs Director

Organizational Affiliation:

\* Telephone Number:

802-505-1338

Fax Number:

\* Email:

annkarlene.kroll@vermont.gov

**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

**\* 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

CFDA Title:

**\* 12. Funding Opportunity Number:**

FR-6700-N-99

\* Title:

Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Main Competition

**13. Competition Identification Number:**

Title:

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

Add Attachment

Delete Attachment

View Attachment

**\* 15. Descriptive Title of Applicant's Project:**

Address critical infrastructure needs in non-profit and cooperatively-owned manufactured home communities.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant **001**

\* b. Program/Project

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

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date: **10/01/2024**

\* b. End Date: **09/30/2030**

**18. Estimated Funding (\$):**

* a. Federal	<b>\$16,000,000</b>
* b. Applicant	<b>\$748,233</b>
* c. State	<b>\$125,000</b>
* d. Local	
* e. Other	<b>\$4,500,000</b>
* f. Program Income	<b>\$0</b>
* g. TOTAL	<b>\$21,373,233</b>

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

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

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

- Yes
- No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

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

**\*\* I AGREE**

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

**Authorized Representative:**

Prefix:  \* First Name: **Ann**  
Middle Name: **Karlene**  
\* Last Name: **Kroll**  
Suffix:

\* Title: **DHCD Federal Programs Director**

\* Telephone Number: **802-505-1338** Fax Number:

\* Email: **annkarlene.kroll@vermont.gov**

\* Signature of Authorized Representative:  Completed by Grants.gov upon submission. \* Date Signed:  Completed by Grants.gov upon submission.

**Applicant and Recipient  
Assurances and Certifications**

**U.S. Department of Housing  
and Urban Development**

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

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

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

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

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

\*Authorized Representative Name:

Prefix:

\*First Name:

Middle Name:

\*Last Name:

Suffix:

\*Title:

\*Applicant Organization:

1. Has the legal authority to apply for Federal assistance, has the institutional, managerial and financial capability (including funds to pay the non-Federal share of program costs) to plan, manage and complete the program as described in the application and the governing body has duly authorized the submission of the application, including these assurances and certifications, and authorized me as the official representative of the application to act in connection with the application and to provide any additional information as may be required.

2. Will administer the grant in compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C 2000(d)) and implementing regulations (24 CFR part 1), which provide that no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or otherwise be subject to discrimination under any program or activity that receives Federal financial assistance OR if the applicant is a Federally recognized Indian tribe or its tribally designated housing entity, is subject to the Indian Civil Rights Act (25 U.S.C. 1301-1303).

3. Will administer the grant in compliance with Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), as amended, and implementing regulations at 24 CFR part 8, the American Disabilities Act (42 U.S.C. §§ 12101 et.seq.), and implementing regulations at 28 CFR part 35 or 36, as applicable, and the Age Discrimination Act of 1975 (42 U.S.C. 6101-07) as amended, and implementing regulations at 24 CFR part 146 which together provide that no person in the United States shall, on the grounds of disability or age, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity that receives Federal financial assistance; except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.

4. Will comply with the Fair Housing Act (42 U.S.C. 3601-19), as amended, and the implementing regulations at 24 CFR part 100, which prohibit discrimination in housing on the basis of race, color, religion sex (including gender identity and sexual orientation), disability, familial status, or national origin and will affirmatively further fair housing; except an applicant which is an Indian tribe or its instrumentality which

is excluded by statute from coverage does not make this certification; and further except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.

5. Will comply with all applicable Federal nondiscrimination requirements, including those listed at 24 CFR §§ 5.105(a) and 5.106 as applicable.

6. Will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601) and implementing regulations at 49 CFR part 24 and, as applicable, Section 104(d) of the Housing and Community Development Act of 1974 (42 U.S.C. 5304(d)) and implementing regulations at 24 CFR part 42, subpart A.

7. Will comply with the environmental requirements of the National Environmental Policy Act (42 U.S.C. 4321 et.seq.) and related Federal authorities prior to the commitment or expenditure of funds for property.

8. That no Federal appropriated funds have been paid, or will be paid, by or on behalf of the applicant, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, and officer or employee of Congress, or an employee of a Member of Congress, in connection with the awarding of this Federal grant or its extension, renewal, amendment or modification. If funds other than Federal appropriated funds have or will be paid for influencing or attempting to influence the persons listed above, I shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying. I certify that I shall require all subawards at all tiers (including sub-grants and contracts) to similarly certify and disclose accordingly. Federally recognized Indian Tribes and tribally designated housing entities (TDHEs) established by Federally-recognized Indian tribes as a result of the exercise of the tribe's sovereign power are excluded from coverage by the Byrd Amendment, but State-recognized Indian tribes and TDHs established under State law are not excluded from the statute's coverage.

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

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

\*Signature:

Completed Upon Submission to Grants.gov

\*Date:

Completed Upon Submission to  
Grants.gov

# Applicant/Recipient Disclosure/Update Report

U.S. Department of Housing and Urban Development

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

## Applicant/Recipient Information

\* UEI Number:

WNDAaub5HAW1

\* Report Type:

INITIAL

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

\* Applicant Name: State of Vermont, Agency of Commerce and Community Development

\* Street1: One National Life Drive, Deane C. Davis Bldg., Sixth Floor

Street2:

\* City: Montpelier

County:

\* State: Vermont

\* Zip Code: 05620-0501

\* Country: United States

\* Phone: 802-505-1338

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

### \* 3. HUD Program Name:

Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Competition

\* 4. Amount of HUD Assistance Requested/Received: \$ 16,000,000

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

\* Project Name: Statewide Infrastructure assistance for nonprofit and cooperatively owned manufactured housing communities

\* Street1: Vermont Housing and Conservation Board, subrecipient

Street2: 58 East State Street

\* City: Montpelier

County:

\* State: Vermont

\* Zip Code: 05602

\* Country: United States

## Part I Threshold Determinations

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

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

Yes  No

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



---

**Part II Other Government Assistance Provided or Requested / Expected Sources and Use of Funds.**

Such assistance includes, but is not limited to, any grant, loan, subsidy, guarantee, insurance, payment, credit, or tax benefit.

---

Department/State/Local Agency Name:

\* Government Agency Name:

Government Agency Address:

\* Street1:

Street2:

\* City:

County:

\* State:

\* Zip Code:

\* Country:

\* Type of Assistance:

\* Amount Requested/Provided: \$

\* Expected Uses of the Funds:

---

Department/State/Local Agency Name:

\* Government Agency Name:

Government Agency Address:

\* Street1:

Street2:

\* City:

County:

\* State:

\* Zip Code:

\* Country:

\* Type of Assistance:

\* Amount Requested/Provided: \$

\* Expected Uses of the Funds:

---

**Note:** Use additional pages if necessary.

---

**Part III Interested Parties. You must disclose:**

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

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

\* Unique Entity ID

\* Type of Participation in Project/Activity

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

	* Unique Entity ID	* Type of Participation in Project/Activity	* Financial Interest in Project/Activity (\$ and %)
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %

2. Any other person who has a financial interest in the project or activity for which the assistance is sought that exceeds \$50,000 or 10 percent of the assistance (whichever is lower).

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

City of Residence

\* Type of Participation in Project/Activity

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

	City of Residence	* Type of Participation in Project/Activity	* Financial Interest in Project/Activity (\$ and %)
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %
<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text"/> <input type="text"/> %

**Note:** Use additional pages if necessary.

Add Attachment

Delete Attachment

View Attachment

**Certification**

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

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

\* Signature:

\* Date: (mm/dd/yyyy)

Completed Upon Submission to Grants.gov

Completed Upon Submission  
to Grants.gov

## Instructions

### Overview.

#### A. Coverage. You must complete this report if:

- (1) You are applying for assistance from HUD for a specific project or activity **and** you have received, or expect to receive, assistance from HUD in excess of \$200,000 during the fiscal year;
- (2) You are updating a prior report as discussed below; or
- (3) You are submitting an application for assistance to an entity other than HUD, a State or local government if the application is required by statute or regulation to be submitted to HUD for approval or for any other purpose.

#### B. Update reports (filed by "Recipients" of HUD Assistance):

**General.** All recipients of covered assistance must submit update reports to the Department to reflect substantial changes to the initial applicant disclosure reports.

#### Line-by-Line Instructions.

##### Applicant/Recipient Information.

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

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

##### Part I. Threshold Determinations - Applicants Only

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

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

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

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

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

The following information must be provided:

1. Enter the name and address, city, State, and zip code of the government agency making the assistance available.
2. State the type of other government assistance (e.g., loan, grant, loan insurance).
3. Enter the dollar amount of the other government assistance that is, or is expected to be, made available with respect to the project or activities for which the HUD assistance is sought (applicants) or has been provided (recipients).
4. Uses of funds. Each reportable use of funds must clearly identify the purpose to which they are to be put. Reasonable aggregations may be used, such as "total structure" to include a number of structural costs, such as roof, elevators, exterior masonry, etc.

**B. Non-Government Assistance.** Note that the applicant and recipient disclosure report must specify all expected sources and uses of funds - both from HUD and any other source - that have been or are to be, made available for the project or activity. Non-government sources of Form HUD-2880 funds typically include (but are not limited to) foundations and private contributors.

##### Part III. Interested Parties.

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

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

The information required below must be provided.

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

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

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

**Notes:**

1. All citations are to 24 CFR Part 4, which was published in the Federal Register. [April 1, 1996, at 63 Fed. Reg. 14448.]
2. Assistance means any contract, grant, loan, cooperative agreement, or other form of assistance, including the insurance or guarantee of a loan or mortgage, that is provided with respect to a specific project or activity under a program administered by the Department. The term does not include contracts, such as procurements contracts, that are subject to the Fed. Acquisition Regulation (FAR) (48 CFR Chapter 1).
3. See 24 CFR §4.9 for detailed guidance on how the threshold is calculated.

4. "Other government assistance" is defined to include any loan, grant, guarantee, insurance, payment, rebate, subsidy, credit, tax benefit, or any other form of direct or indirect assistance from the Federal government (other than that requested from HUD in the application), a State, or a unit of general local government, or any agency or instrumentality thereof, that is, or is expected to be made, available with respect to the project or activities for which the assistance is sought.

5. For the purpose of this form and 24 CFR Part 4, "person" means an individual (including a consultant, lobbyist, or lawyer); corporation; company; association; authority; firm; partnership; society; State, unit of general local government, or other government entity, or agency thereof (including a public housing agency); Indian tribe; and any other organization or group of people.

# DISCLOSURE OF LOBBYING ACTIVITIES

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

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

<b>1. * Type of Federal Action:</b> <input type="checkbox"/> a. contract <input checked="" type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	<b>2. * Status of Federal Action:</b> <input type="checkbox"/> a. bid/offer/application <input checked="" type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	<b>3. * Report Type:</b> <input checked="" type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change
--	--	--

**4. Name and Address of Reporting Entity:**  
 Prime     SubAwardee

\* Name

\* Street 1  Street 2

\* City  State  Zip

Congressional District, if known:

**5. If Reporting Entity in No.4 is Subawardee, Enter Name and Address of Prime:**

<b>6. * Federal Department/Agency:</b> <input type="text"/>	<b>7. * Federal Program Name/Description:</b> <input type="text"/> CFDA Number, if applicable: <input type="text"/>
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<b>8. Federal Action Number, if known:</b> <input type="text"/>	<b>9. Award Amount, if known:</b> \$ <input type="text"/>
--	--

**10. a. Name and Address of Lobbying Registrant:**

Prefix  \* First Name  Middle Name

\* Last Name  Suffix

\* Street 1  Street 2

\* City  State  Zip

**b. Individual Performing Services** (including address if different from No. 10a)

Prefix  \* First Name  Middle Name

\* Last Name  Suffix

\* Street 1  Street 2

\* City  State  Zip

**11.** Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when the transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be reported to the Congress semi-annually and will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

\* Signature:

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

Title:  Telephone No.:  Date:

---

## CERTIFICATION REGARDING LOBBYING

### Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

### Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

\* APPLICANT'S ORGANIZATION

Agency of Commerce and Community Development

\* PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE

Prefix:  \* First Name:  Middle Name:

\* Last Name:  Suffix:

\* Title:

\* SIGNATURE:

\* DATE:

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# Grant Application Detailed Budget Worksheet

OMB Approval No. 2501-0017  
Expiration: 1/31/2026

<b>Applicant Name:</b> <b>Applicant Address:</b>	State of Vermont
	One National Life Drive
	Deane C. Davis Bldg, Sixth Floor
	Montpelier, VT 05620-0501

Subgrantee Administration				Detailed Description of Budget (for full grant period)							
1. Personnel (Direct Labor)	Estimated Hours	Rate per Hour	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Position or Individual											
Senior Housing Analyst	432	\$39.02	\$16,857	\$16,857							
Federal Housing Program Coordinator	1,872	\$38.02	\$71,172	\$71,172							
Federal Housing Program Director	1,770	\$45.52	\$80,576	\$80,576							
Asset Manager	186	\$43.52	\$8,095	\$8,095							
Housing Program Assistant	1,200	\$30.02	\$36,018	\$36,018							
Asso Housing Director	126	\$48.72	\$6,139	\$6,139							
Housing Director	126	\$53.03	\$6,681	\$6,681							
Stewardship Coordinator	525	\$38.52	\$20,223	\$20,223							
Executive Director	108	\$96.05	\$10,373	\$10,373							
Controller	345	\$48.02	\$16,568	\$16,568							
Chief Financial Officer	62	\$65.53	\$4,090	\$4,090							
Grants Coordinator	126	\$37.52	\$4,727	\$4,727							
General Counsel	250	\$57.53	\$14,360	\$14,360							
<b>Total Direct Labor Cost</b>	<b>7,128</b>		<b>295,882</b>	<b>295,882</b>							
2. Fringe Benefits	Rate (%)	Base	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Estimated Benefit Rate	50.70%	\$295,882	\$150,012	\$150,012							
<b>Total Fringe Benefits Cost</b>			<b>\$150,012</b>	<b>\$150,012</b>							

**Grant Application Detailed Budget Worksheet**

OMB Approval No. 2501-0017  
Expiration: 1/31/2026

Applicant Name: State of Vermont											
<b>3. Travel</b>											
<b>3a. Transportation - Local Private Vehicle</b>	<b>Mileage</b>	<b>Rate per Mile</b>	<b>Estimated Cost</b>	<b>HUD Share</b>	<b>Applicant Match</b>	<b>Other HUD Funds</b>	<b>Other Federal Share</b>	<b>State Share</b>	<b>Local/Tribal Share</b>	<b>Other</b>	<b>Program Income</b>
Estimated in-state travel	3460	\$0.670	\$2,318	\$2,318							
Subtotal - Trans - Local Private Vehicle			<b>\$2,318</b>	<b>\$2,318</b>							
<b>3b. Transportation - Airfare (show destination)</b>	<b>Trips</b>	<b>Fare</b>	<b>Estimated Cost</b>	<b>HUD Share</b>	<b>Applicant Match</b>	<b>Other HUD Funds</b>	<b>Other Federal Share</b>	<b>State Share</b>	<b>Local/Tribal Share</b>	<b>Other</b>	<b>Program Income</b>
Subtotal - Transportation - Airfare											
<b>3c. Transportation - Other</b>	<b>Quantity</b>	<b>Unit Cost</b>	<b>Estimated Cost</b>	<b>HUD Share</b>	<b>Applicant Match</b>	<b>Other HUD Funds</b>	<b>Other Federal Share</b>	<b>State Share</b>	<b>Local/Tribal Share</b>	<b>Other</b>	<b>Program Income</b>
Subtotal - Transportation - Other											
<b>3d. Per Diem or Subsistence (indicate location)</b>	<b>Days</b>	<b>Rate per Day</b>	<b>Estimated Cost</b>	<b>HUD Share</b>	<b>Applicant Match</b>	<b>Other HUD Funds</b>	<b>Other Federal Share</b>	<b>State Share</b>	<b>Local/Tribal Share</b>	<b>Other</b>	<b>Program Income</b>
Subtotal - Per Diem or Subsistence											
<b>Total Travel Cost</b>											
<b>4. Equipment (Only items over \$5,000 Depreciated value)</b>	<b>Quantity</b>	<b>Unit Cost</b>	<b>Estimated Cost</b>	<b>HUD Share</b>	<b>Applicant Match</b>	<b>Other HUD Funds</b>	<b>Other Federal Share</b>	<b>State Share</b>	<b>Local/Tribal Share</b>	<b>Other</b>	<b>Program Income</b>
<b>Total Equipment Cost</b>											



**Grant Application Detailed Budget Worksheet**

OMB Approval No. 2501-0017  
Expiration: 1/31/2026

Applicant Name: State of Vermont											
<b>5. Supplies and Materials (Items under \$5,000 Depreciated Value)</b>											
5a. Consumable Supplies	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Consumable Supplies											
5b. Non-Consumable Materials	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Non-Consumable Materials											
<b>Total Supplies and Materials Cost</b>											
6. Consultants (Type)	Days	Rate per Day	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
5 feasibility contracts @25k per contract			\$125,000		\$125,000						
<b>Total Consultants Cost</b>			\$125,000		\$125,000						
<b>7. Contracts and Sub-Grantees (List individually)</b>											
7a. Contracts	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Contracts											
7b. Sub-Grantees (List individually)	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Sub-grantees to be determined through competitive application process described in application - 8 parks / communities to be awarded funds	8	\$2,147,203.88	\$17,177,631	\$13,177,631						\$ 4,000,000.00	
These are "per community" figures											
Subtotal - Sub-Grantees			\$17,177,631	\$13,177,631						\$ 4,000,000.00	
<b>Total Contracts and Sub-Grantees Cost</b>											

**Grant Application Detailed Budget Worksheet**

OMB Approval No. 2501-0017  
Expiration: 1/31/2026

Applicant Name: State of Vermont											
<b>8. Construction Costs</b>											
<b>8a. Administrative and legal expenses</b>	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Estimated Administrative costs	1	91132	\$91,132	\$91,132							
Subtotal - Administrative and legal expenses			\$91,132	\$91,132							
<b>8b. Land, structures, rights-of way, appraisal, etc</b>	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Land, structures, rights-of way, ...											
<b>8c. Relocation expenses and payments</b>	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Relocation expenses and payments											
<b>8d. Architectural and engineering fees</b>	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Architectural and engineering fees											
<b>8e. Other architectural and engineering fees</b>	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Other architectural and engineering fees											
<b>8f. Project inspection fees</b>	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
Subtotal - Project inspection fees											

**Grant Application Detailed Budget Worksheet**

OMB Approval No. 2501-0017  
Expiration: 1/31/2026

Applicant Name: State of Vermont											
	Quantity	Unit Cost	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
<b>8g. Site work</b>											
Subtotal - Site work											
<b>8h. Demolition and removal</b>											
Subtotal - Demolition and removal											
<b>8i. Construction</b>											
<b>Homes</b>	10	\$ 150,000.00	\$1,500,000			\$1,000,000.00				\$ 500,000.00	
Subtotal - Construction											
<b>8j. Equipment</b>											
Subtotal - Equipment											
<b>8k. Contingencies</b>											
Subtotal - Contingencies											
<b>8l. Miscellaneous</b>											
Subtotal - Miscellaneous											
<b>Total Construction Costs</b>											

**Grant Application Detailed Budget Worksheet**

OMB Approval No. 2501-0017  
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Applicant Name: State of Vermont		Estimated Hours	Rate per hour	Estimated Cost	HUD Share	Applicant Match	Other HUD Funds	Other Federal Share	State Share	Local/Tribal Share	Other	Program Income
<b>State General Administration</b>												
<b>Personnel (Direct Labor)</b>												
Position												
Director of Federal Programs		3696	\$62.98	\$232,774	\$139,665	\$93,109						
Department General Counsel		2496	\$60.38	\$150,708	\$90,425	\$60,283						
Environmental Officer		3896	\$39.01	\$151,983	\$131,190	\$20,793						
Environmental Specialist		3896	\$26.06	\$101,530	\$60,918	\$40,612						
Grants Management Analyst		3896	\$49.93	\$194,644	\$116,787	\$77,857						
Grants Management Specialist		2496	\$32.67	\$81,544	\$48,927	\$32,617						
Grants Management Specialist		3696	\$34.80	\$128,620	\$77,172	\$51,448						
Director of Housing		2496	\$42.74	\$106,679	\$64,008	\$42,671						
Administrative Services Manager II		3696	\$42.74	\$157,967	\$94,781	\$63,186						
<b>Total Direct Labor</b>				<b>\$1,306,449</b>	<b>\$823,873</b>	<b>\$482,576</b>						
<b>Fringe Benefits</b>												
Director of Federal Programs			\$22.00	\$81,312	\$48,788	\$32,524						
Department General Counsel			\$33.00	\$81,513	\$48,908	\$32,605						
Environmental Officer			\$16.00	\$62,336	\$37,402	\$24,934						
Environmental Specialist			\$11.00	\$42,856	\$25,714	\$17,142						
Grants Management Analyst			\$29.00	\$112,984	\$67,791	\$45,193						
Grants Management Specialist			\$11.00	\$27,456	\$16,474	\$10,982						
Grants Management Specialist			\$24.00	\$88,704	\$53,223	\$35,481						
Director of Housing			\$21.00	\$52,416	\$31,450	\$20,966						
Administrative Services Manager II			\$31.00	\$114,576	\$68,746	\$45,830						
				<b>\$664,153</b>	<b>\$398,496</b>	<b>\$265,657</b>						
<b>Subtotal of Direct Costs</b>												
<b>10. Indirect Costs</b>		<b>Rate</b>	<b>Base</b>	<b>Estimated Cost</b>	<b>HUD Share</b>	<b>Applicant Match</b>	<b>Other HUD Funds</b>	<b>Other Federal Share</b>	<b>State Share</b>	<b>Local/Tribal Share</b>	<b>Other</b>	<b>Program Income</b>
Type												
Indirect Operating Expense Rate		20.50%	\$295,882	\$60,656	\$60,656							
<b>Total Indirect Costs</b>				<b>\$60,656</b>	<b>\$60,656</b>							
<b>Total Estimated Costs</b>				<b>\$21,373,233</b>	<b>\$15,000,000</b>	<b>\$873,233</b>	<b>\$1,000,000</b>				<b>\$ 4,500,000.00</b>	

<b>Grant Application Detailed Budget Worksheet</b>	OMB Approval No. 2501-0017 Expiration: 1/31/2026
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Detailed Description of Budget			
	Analysis of Total Estimated Costs	Estimated Cost	Percent of Total
1	Personnel (Direct Labor)	295,882.12	1.4%
2	Fringe Benefits	150,012.23	0.7%
3	Travel	0.00	0.0%
4	Equipment	0.00	0.0%
5	Supplies and Materials	0.00	0.0%
6	Consultants	125,000.00	0.6%
7	Contracts and Sub-Grantees	0.00	0.0%
8	Construction	0.00	0.0%
9	Other Direct Costs	0.00	0.0%
10	Indirect Costs	60,655.83	0.3%
	<b>Total:</b>	<b>21,373,233.43</b>	<b>100.0%</b>
	<b>Federal Share:</b>	<b>\$16,000,000</b>	<b>75%</b>
	<b>Match</b> (Expressed as a percentage of the Federal Share):	<b>\$873,233</b>	<b>5.4%</b>

Previous versions of HUD-424-CBW are obsolete.

## **PRICE CERTIFICATIONS FOR STATE APPLICANTS**

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

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

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

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

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

**Authority of State** -- The submission of the PRICE application is authorized under State law and the State possesses the legal authority to carry out the programs under the consolidated plan for which it is seeking funding, in accordance with applicable HUD regulations.

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

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

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

**Public Participation** -- It is in full compliance with the PRICE streamlined public participation requirements found in Section VI.E of the PRICE NOFO and each unit of general local government that receives assistance from the State is in full compliance with the same.

**Consultation with Local Governments** --

1. It has consulted with affected units of local government in the non-entitlement area of the State in determining the method of distribution of funding, if applicable;
2. It engages in or will engage in planning for community development activities;
3. It provides or will provide technical assistance to units of local government in connection with community development programs; and
4. It will not refuse to distribute funds to any unit of general local government based on the particular eligible activity selected by the unit of general local government to meet its community development needs, except that a State is not prevented from establishing priorities in distributing funding based on the activities selected.

**Local Needs Identification** – It will require each unit of general local government to be funded to identify its community development and housing needs, including the needs of low-income and moderate-income families, and the activities to be undertaken to meet these needs.

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

**Use of Funds** -- It has complied with the following criteria:

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

**Excessive Force** -- It will require units of general local government that receive CDBG funds to certify that they have adopted and are enforcing:

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

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

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K and R; and EPA's lead-based paint rules (e.g., Repair, Renovation and Painting; Pre-Renovation Education; and Lead Training and Certification (40 CFR part 745)).

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

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

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

*AnnKarlene Kroll*

Signature of Authorized Official

4/25/2024 Date

DHCD Federal Programs Director Title