

- a. **Table of Contents.** Provide a table of contents matching the submission requirements of this section. b. **Narrative Exhibits.** The narrative exhibits required in your applications are as follows:
1. **Exhibit A Executive Summary.**
  2. **Exhibit B Threshold Requirements and Other Submission Requirements.** Review and provide a narrative response, as necessary, to the Threshold Requirements in Section III.D and Other Submission Requirements in Section IV.G.
  3. **Exhibit C Need** Review and provide a narrative response to V.A.1.a.
  4. **Exhibit D Soundness of Approach** Review and provide a narrative response to V.A.1.b.
  5. **Exhibit E Capacity** Review and provide a narrative response to V.A.1.c.
  6. **Exhibit F Match or Leverage.** Review and provide a narrative response to V.A.1.d.
  7. **Exhibit G Long-term Effect.** Review and provide a narrative response to V.A.1.e.

**Factor (a): Need**

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

**Project Area & Need for Affordable Housing:**

The Lower Elwha Klallam Tribe, known as the “Strong People,” has resided on the Olympic Peninsula since time immemorial. The reservation is located in a rural area of Clallam County, eight miles west of Port Angeles, Washington.

Lower Elwha Klallam Tribe (LEKT) seeks to expand the existing Lower Elwha Klallam Tribe Homeowner’s Assistance Fund (HAF) to ease the current housing crisis on the LEKT reservation and in the greater service area of the Tribe. The Lower Elwha Klallam Tribe resides in Clallam County, Washington, on the Olympic Peninsula, where those living in poverty or paycheck to paycheck include 70% of all children, 83% of all enrolled kindergarteners, and 100% of all Native American children.<sup>1</sup> LEKT currently has 904 members, 721 of which are 18 years or older. According to the United States Census Bureau, an estimated 129 homes are owned on the reservation or trust land, meaning less than 18% of adult tribal members are homeowners compared to the national average of adult homeowners of 66.1%.<sup>2</sup> The shortage of homes eligible for ownership on our reservation and in our region has led to significant overcrowding,

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<sup>1</sup> “Safe & Affordable Housing,” United Way of Clallam County, accessed May 20, 2024, <https://www.unitedwayclallam.org/housing>.

<sup>2</sup> US Census Bureau Center for New Media Promotion (CNMP), “My Tribal Area: Lower Elwha Reservation and Off-Reservation Trust Land,” United States Census Bureau, March 7, 2017, <https://www.census.gov/tribal/?aianihh=2040>.

multigenerational housing, and homelessness. In the Clallam County Point-In-Time Count of sheltered and unsheltered individuals and families experiencing homelessness 14% of the population experiencing homelessness were American Indian, while American Indians only make up 5.6% of the Clallam County population, demonstrating a higher rate of need for Native individuals and families in our region.<sup>3</sup>

LEKT plans to address this housing crisis in strategic phases. The primary goal of Tribe is to expand the available housing units on the LEKT reservation. The Tribe is currently in the development stage of expanding our infrastructure to support more housing units. It is the Tribe's intent to address the housing crisis during the planning and developmental stages of new infrastructure first by expanding the Homeowner's Assistance Fund to 1) make funds available to repair or replace manufactured houses and 2) expand the down payment assistance fund for qualifying tribal members. LEKT will resolve immediate issues of the housing crisis through this expansion by sustaining the longevity of the manufactured housing units that currently house tribal members and creating a sustainable means for non-homeowners to purchase a manufactured home.

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

The Lower Elwha Klallam Tribe is not identified as a Community Disaster Resilience Zone as defined by FEMA.

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

The Lower Elwha reservation is a disaster-prone area facing significant climate-related challenges. Average annual temperatures are projected to increase by about five degrees Fahrenheit by mid-century and over 8 degrees by the end of the century, with the most substantial

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<sup>3</sup> "2023 Clallam County Coordinated Entry Annual Report," Serenity House of Clallam County, 2023

increases during summer months, leading to more heat waves and extreme heat days. Fire risk is also expected to rise, with the number of days classified as “very high” or “extreme” fire danger increasing by about 35% by the 2050s. Additionally, precipitation patterns are shifting, with more winter rain and less summer rainfall, resulting in higher winter stream flows and lower summer flows, which could intensify flooding and negatively impact riverine species such as the culturally significant salmon.<sup>4</sup>

The proposed expansion of the Lower Elwha Klallam Tribe Homeowners’ Assistance Fund (LEKT HAF) program increases resilience in this disaster-prone area by improving housing stability and safety. Enhanced home repairs can make structures more resistant to extreme heat and fire, reducing the risk of damage and improving livability during heat waves. Additionally, well-maintained homes are better equipped to withstand flooding, minimizing the potential for severe damage. By addressing these vulnerabilities, the proposal helps safeguard the community against the anticipated climate impacts, thereby enhancing overall resilience.

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

The Lower Elwha Klallam Tribal community faces several barriers impeding the preservation or revitalization of manufactured housing. One significant challenge is the material and shipping logistics associated with our rural location. The reservation’s remote setting complicates the timely and cost-effective delivery of necessary construction materials and resources, essential for preserving existing housing and constructing new units. Transportation delays and increased costs due to the area’s geographical isolation can hinder shipping/transporting manufactured homes and our community member’s ability to access the proper repairs or revitalization needed for their homes.

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<sup>4</sup> “Climate Change.” Lower Elwha Klallam Tribe. Accessed May 24, 2024.  
<https://www.elwha.org/departments/natural-resources/climate-change/>.

Additionally, economic constraints present another substantial barrier. Over 25% of the tribe's population lives below the national poverty level, limiting the financial resources available for home repairs and purchasing.<sup>5</sup> The economic hardship faced by most tribal members makes it difficult for many homeowners to afford necessary repairs or upgrades to their manufactured homes, exacerbating the risk of living in substandard conditions. These logistical and economic challenges pose significant obstacles to effectively preserving and revitalizing manufactured housing within the Lower Elwha community.

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

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

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

The vision for this proposal is to enhance living conditions and promote homeownership among the Lower Elwha tribal members by expanding the existing homeowner's assistance fund. This expansion aims to ensure that every tribal member has access to safe, livable housing, strengthening the community's resilience and overall well-being.

The goals of the program are threefold:

1. **Create Safe, Livable Conditions:** Provide repair or replacement funds to qualifying tribal members and homes. This goal focuses on ensuring that current manufactured homes are safe, secure, and suitable for living, reducing the risks associated with substandard housing.
2. **Promote Homeownership:** Offer down payment assistance of up to \$20,000 to help qualifying tribal members purchase manufactured homes. This initiative is designed to make homeownership more accessible to low to moderate-income households and individuals, thereby fostering a sense of stability and investment in the community.

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<sup>5</sup> US Census Bureau Center for New Media Promotion (CNMP), "My Tribal Area: Lower Elwha Reservation and Off-Reservation Trust Land," United States Census Bureau, March 7, 2017, <https://www.census.gov/tribal/?aianihh=2040>.

3. Expedite Home Repair or Replacement: The program streamlines the process of home repair or replacement for qualifying members by providing timely financial support. By reducing delays and improving the efficiency of housing improvements, the program ensures that tribal members can quickly benefit from safer and more reliable housing.

Through these goals, the expanded program seeks to address the immediate housing needs of the tribe, support economic development, and build a stronger, more resilient community.

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

To address the needs described in Factor (a), preservation and revitalization activities will be conducted by expanding the HAF program and offering home repairs and replacement (when necessary) for qualifying manufactured homes. The program will also conduct manufactured housing development activities by financing the acquisition of affordable, accessible housing through the down payment assistance fund.

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

Timeline: Three years or funds depleted

Year 1	Task
Q1 (Months 1-3)	Identify manufactured homes owned by eligible tribal members <ul style="list-style-type: none"> <li>• Conduct a comprehensive survey and outreach campaign to locate and verify eligible manufactured homes and their owners.</li> <li>• Create a database of identified homes and their condition assessments.</li> </ul>
Q2 (Months 4-6)	Hire additional maintenance worker to expedite MH repairs <ul style="list-style-type: none"> <li>• Advertise the job opening, conduct interviews, and hire a qualified maintenance worker.</li> <li>• Provide training and integrate the new worker into the existing maintenance team.</li> </ul>
Q3 (Month 7-9)	Open applications for expansion of the program <ul style="list-style-type: none"> <li>• Update and distribute application forms and guidelines</li> <li>• Launch a community awareness campaign to inform eligible tribal members about the expanded program.</li> <li>• Launch down payment assistance program with clear eligibility criteria and application instructions.</li> <li>• Conduct outreach to ensure potential applicants are aware of the program and its benefits.</li> </ul>
Q4 (Month 10-12)	Begin repairs in order of priority and received <ul style="list-style-type: none"> <li>• Start repairs on the highest priority homes based on condition assessments, health factors, and application submission dates</li> </ul>

	<ul style="list-style-type: none"> <li>• Monitor progress and adjust schedules as needed to ensure efficient use of resources.</li> <li>• Process down payment assistance applications and begin disbursing funds to qualified applicants.</li> </ul>
Year 2	
Q1 (Months 13-15) Q2 (Months 16-18) Q3 (Months 19-21)	<ul style="list-style-type: none"> <li>• Continue repairs on identified homes, focusing on those in critical need.</li> <li>• Evaluate the effectiveness of the repairs and adjust processes for better efficiency.</li> <li>• Continue processing new applications for both repair and down payment assistance programs.</li> <li>• Maintain regular progress assessments and adjust strategies as necessary.</li> </ul>
Q4 (Months 22-24)	<ul style="list-style-type: none"> <li>• Conduct a mid-term evaluation of the program's impact on housing conditions and homeownership rates.</li> <li>• Use findings to refine program implementation and address any emerging challenges.</li> </ul>
Year 3	
Q1 (Months 25-27) Q2 (Months 28-30) Q3 (Months 31-33)	<ul style="list-style-type: none"> <li>• Continue processing new applications for both repair and down payment assistance programs.</li> </ul>
Q4 (Months 34-36)	<ul style="list-style-type: none"> <li>• Finalize repairs on all identified homes within the current program scope.</li> <li>• Conduct a comprehensive review of the three-year program, documenting successes, lessons learned, and recommendations for future initiatives.</li> <li>• Prepare a final report</li> </ul>

**4. What is your budget?**

\$2,216,800.00

The tribe requests \$2,216,800.00 to expand the existing HAF program for the repair of existing manufactured homes and the purchase of manufactured homes by LEKT tribal members.

Repair Program: \$1,400,000.00

- Repair: 30 existing manufactured homes x \$10,000.00 repair funds per home = \$300,000.00
- Replacement: up to 4 manufactured homes in need of replacement x \$275,000.00 per home = \$1,100,000.00

Down payment Assistance: \$300,000.00

- Up to 15 new homeowners x \$20,000.00 per down payment = \$300,000.00

Indirect Costs

- Federally negotiated indirect cost rate 30.40% x \$1,700,000.00 = \$516,800.00

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

If implemented, the HAF program expansion will significantly ease the immediate housing crisis for the Lower Elwha tribal members and the community.

The project will directly address substandard living conditions by providing funds for repairs or replacements of manufactured homes. This will ensure that homes are safe, secure, and habitable, reducing risks associated with deteriorated housing, such as health hazards and structural failures.

The down payment assistance program will make it easier for low to moderate-income tribal members to purchase manufactured homes. This will increase the homeownership rate within the community, providing stability and a sense of ownership and pride among residents.

Upgrading and maintaining homes to withstand the anticipated impacts of climate change (e.g., increased temperatures, fire risk, and changing precipitation patterns) will enhance the community's overall resilience. This will better prepare the tribe for future environmental challenges, reducing potential displacement and economic loss.

Addressing the immediate repair needs will prevent families from living in unsafe conditions or facing homelessness due to uninhabitable homes. This will provide greater housing stability, which is crucial for the well-being of families and the community.

The streamlined process for home repair and replacement will expedite the provision of housing assistance. This means that tribal members will receive the help they need more quickly, reducing the duration of living in inadequate conditions.

By targeting low to moderate-income households and individuals, the project ensures that the most vulnerable members of the tribe receive the support they need. This can significantly improve their quality of life and provide a pathway out of poverty through stable and improved housing conditions.

Overall, implementing this project will profoundly impact easing the immediate housing crisis within the Lower Elwha Reservation, fostering a healthier, more resilient, and economically stable community.

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

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

The program will focus on several key strategies to ensure the availability of affordable manufactured housing options to low-to-moderate-income households. Up to \$20,000 in down payment assistance will reduce upfront costs for eligible households, making homeownership more attainable. Additionally, the program will allocate funds for repairing and improving existing manufactured homes, ensuring they remain safe and habitable.

A streamlined application process will simplify access to the program's benefits. Community meetings and outreach campaigns will inform tribal members about the program and how to apply, ensuring broad awareness and participation. Finally, regular monitoring and evaluation will ensure the program meets the needs of low to moderate-income households and allow for necessary adjustments. These comprehensive measures will ensure affordable manufactured housing options are accessible to the Lower Elwha Reservation's low to moderate-income households.

**2. What protections will be in place for residents?**

LEKT will continue an adopted policy that protects the Tribe and the residents while ensuring their safety and well-being. The LEKT Homeowners Assistance Fund PLAN was developed with public participation and community engagement to ensure the community's voices and concerns were understood before implementing the policy. The community participated in developing the criteria and eligibility requirements for the program, ensuring the community's needs were met. To protect residents/applicants, the policy includes an appeal process for applicants dissatisfied



with the Tribe's decision of eligibility for assistance, the level of benefit approved, or the type of services available.<sup>6</sup>

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

As a federally recognized Native American tribe, LEKT will serve adult tribal members who currently own manufactured homes or are interested in purchasing them. This program encourages access to resources and financing by implementing targeted support and outreach strategies. Providing substantial down payment assistance of up to \$20,000 reduces the financial barriers to homeownership for low-to-moderate-income tribal members. The program also offers repair and revitalization funding, ensuring existing homes remain safe and livable, which is crucial for households that cannot afford extensive repairs. Financial counseling and homebuyer education further empower participants by enhancing their financial literacy and guiding them through home-buying. Streamlined application procedures simplify access, making it easier for eligible members to benefit from the program. Additionally, community meetings and robust outreach campaigns ensure that information about the program reaches all eligible tribal members, ensuring broad awareness and participation. Regularly monitoring and evaluating the program help tailor its offerings to meet the community's evolving needs, thus continuously enhancing access to essential housing resources and financing.

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

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

The housing assistance program on the Lower Elwha Reservation faces several significant hazards that could impact its success and safety. Extreme weather events, including hurricanes, storms, and heavy rainfall, pose a threat to repair activities and existing homes, potentially leading to delays and damages. With the increasing risk of wildfires in the region due to rising

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<sup>6</sup> "Home owners Assistance Fund PLAN Lower Elwha Klallam Tribe, Washington State." Lower Elwha Klallam Tribe. 2021.

temperatures and dry conditions, the safety of both repair sites and residents becomes a concern. Furthermore, changes in precipitation patterns may result in flooding, particularly in low-lying areas, which could damage homes and infrastructure, causing setbacks in the project timeline. Earthquakes, a common occurrence in the Pacific Northwest, also present a risk of structural damage to homes and construction sites. Moreover, supply chain disruptions and social and economic challenges, including poverty and limited resource access, may further impact the project's success. Addressing these hazards requires thorough planning, risk assessment, and mitigation measures to ensure the safety of workers and residents, as well as the successful implementation of the housing assistance program.

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

The project activities will address current and future natural hazards or extreme weather threats through comprehensive planning and proactive measures. Firstly, during the identification phase, homes will be assessed for vulnerability to various hazards, allowing for targeted repairs or replacements to enhance resilience. In response to the immediate risks of extreme weather events, such as storms or wildfires, construction activities will incorporate robust building techniques and materials designed to withstand such challenges. Additionally, ongoing maintenance efforts will reinforce homes against potential hazards, ensuring their durability and safety in changing climate conditions. Furthermore, by incorporating climate-resilient design principles and leveraging local knowledge, the project will future-proof homes against anticipated climate impacts, mitigating the potential damage and disruption caused by extreme weather events in the years to come.

Through these proactive measures and community-focused approaches, the project activities will effectively address the current and future threats of natural hazards or extreme weather, safeguarding the well-being and stability of the Lower Elwha Reservation.

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

This project embodies a crucial step towards advancing environmental justice by serving the tribal community of the Lower Elwha Klallam Tribe, which has long endured displacement and systemic underservice. By prioritizing assistance for tribal members in accessing safe and affordable housing options, the project addresses longstanding disparities in housing access and quality. Historically, Indigenous communities like the Lower Elwha tribe have faced disproportionate impacts from environmental degradation and discriminatory policies, resulting in housing insecurity and displacement. The project improves living conditions and fosters a sense of belonging and stability within the community through targeted support for home repairs, replacements, and down payment assistance. By centering the needs of the tribal community and empowering them to thrive in their ancestral lands, this project aligns with the principles of environmental justice, aiming to rectify historical injustices and promote equity for generations to come.

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

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

The LEKT HAF program was developed with specific community involvement to address the housing and homeowner needs of the community first and foremost. To continue the partnership between the Tribe and the community for this program, the Tribe will facilitate open communication and engagement with various stakeholders, including tribal members, community leaders, local businesses, housing advocates, and government agencies. By soliciting input and feedback from diverse perspectives within our community, the program ensures that the needs and concerns of all stakeholders are considered in the decision-making process. This application was posted for community review comment on June 26, 2024 to ensure the voices of the Lower Elwha community are heard.

Additionally, the program will offer multiple avenues for participation, such as community meetings and surveys to accommodate varying preferences and accessibility needs. Moreover, the

program will prioritize transparency and accountability by regularly updating project progress and outcomes, fostering stakeholder trust and confidence. By actively involving diverse stakeholders in the program's planning, implementation, and evaluation, it will benefit from a range of insights and expertise, leading to more equitable and effective outcomes for the entire community.

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

This proposal expands an existing community program/policy that the tribal community, tribal council, and tribal executive officers developed, adopted, and implemented. The LEKT HAF program was developed and implemented after President Biden signed the historic American Rescue Plan Act (ARPA), including the Homeowner Assistance Fund, administered through the Department of Treasury.

Lower Elwha Klallam Tribe assessed their capacity and goals for this funding, consulting the community to understand the needs that should be met with the assistance program.

“The Lower Elwha Klallam Tribe shall utilize the Homeowners Assistance Funds per financial assistance agreement with the U.S. Department of Treasury to provide financial assistance to eligible homeowners to use for qualified expenses for the uses set forth herein and in accordance with the HAF guidelines, especially those with immediate challenges of Mortgage delinquencies or displacement prevention. Lower Elwha will be responsive to the community needs by providing clear pathways to accessing LEKT/HAF program funding providing culturally relevant outreach as we will conduct services the best way possible to eliminate any barriers for all eligible participants.”<sup>7</sup>

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<sup>7</sup> “Home owners Assistance Fund PLAN Lower Elwha Klallam Tribe, Washington State.” Lower Elwha Klallam Tribe. 2021.

Additionally, LEKT plans to expand housing to address our community's housing crisis. The expansion of the HAF program is the first stage of addressing the housing crisis. The Tribe is focusing on the planning and design stages of expanding our infrastructure to allow future community housing development. By providing home repair (replacement for qualifying homes) funds while also providing down payment assistance for potential homeowners, the Tribe will address the current state of homes and assist Tribal members with land assignments without a home.

**Factor (c): Capacity**

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

Lower Elwha Klallam tribe is a sovereign nation that provides services, programs, and resources to its community and develops and implements projects to ensure our longevity and culture.

The Tribe has successfully managed projects, especially grant-funded projects, for decades. Since 2020, the Tribe has been awarded over sixty grants dedicated to health and wellness, social services, public works, justice, and culture. The Tribe operates several governmental departments that design and implement the projects that best serve our community. All grant-funded projects have been executed successfully and completed per the designated awarding contract.

The LEKT HAF program began in 2020 and has successfully received, reviewed, and answered tribal members' applications using funding granted by the U.S. Department of Treasury.

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

Lower Elwha Klallam Tribe operates many programs and projects with federally and state-awarded grant funds. The Tribe has remained in good standing with all awarding agencies and has successfully closed hundreds of grants. [Please see attached audit].

The HAF program operates on grant funds through the U.S. Department of Treasury and has been run efficiently, ensuring that all applications can be served or prioritized as needed.

### 3. Who are your key staff?

#### **Tonya Clark – Project Supervisor**

As the Lower Elwha Klallam Tribe's executive director, Tonya is responsible for the general oversight of the Lower Elwha Klallam Tribe Homeowner's Assistance Program. She will monitor progress and ensure the expansion of the program is implemented efficiently.

Tonya Clark has been the Tribe's Executive Director since 2019 and an employee of the Tribe since 1998. She served as the Project Manager for the last ICDBG awarded to the Tribe in 2008, overseeing the implementation of the 2008 ICDBG, which laid the groundwork for the eventual building of the regionally acclaimed LEKT Children's House of Learning. As the Executive Director for the Tribe, Tonya supervised the expansion of the Elwha River Casino (completed June 2023), a 13 million dollar project that expanded the economic opportunities of the Tribe. Tonya ensured that the project was completed despite the temporary halt in the supply chain due to the COVID-19 pandemic. Under Tonya's direction, the Tribe has successfully navigated the pandemic and completed several large-scale projects, including the Lower Elwha Food Bank construction and the Elwha River Casino expansion.

Tonya Clark has supervised every grant awarded to the Tribe since 2015 and every project undertaken since 2019. Her experience navigating the processes of government agencies for grant opportunities and successfully fulfilling awardee obligations required by federal regulations.

#### **Nancy Hamilton – Program Manager**

As the Tribal Community Liaison, Nancy Hamilton has managed the LEKT HAF program since its implementation in 2021. Nancy has monitored the applications and implementation, ensuring that all priority requests are addressed effectively and efficiently. She has also managed the program fiscally, ensuring that funds are used as efficiently as possible to address as many housing issues as possible.

Nancy is a LEKT tribal descendant and community member who has dedicated her life to service. She started her career as a medic and EMT after coming home to work for the Tribe. She worked

at Klallam Counseling Service as a Provider One navigator reception and served as a family advocate. She is certified as a peer counselor and facilitator, having worked with KCS for five years. She then transitioned to the Tribe's Justice Department, working as the Sexual Assault Response Coordinator, where she facilitated and coordinated resources, services, care, and advocacy for victims of sexual assault.

During her tenure with the Tribe, Nancy established a significant rapport with the community and became the community liaison with the Social Services Department. Nancy connects community members with the resources and programs they need, like HAF. Nancy has successfully monitored HAF applications and projects throughout the program, creating significant change in the lives of tribal members.

Nancy will continue to manage the HAF program and the extended HAF program for manufactured housing to ensure the success of the program.

### **Reed "Bucky" Johnson**

Bucky Johnston is the Operations Manager of Public Works after previously serving as a Housing Maintenance Supervisor. He has been with the Tribe for two years and brings 20 years of experience as a licensed general contractor. Bucky has worked on all reservation housing projects during his tenure with LEKT, including whole house remodels, metal and composition roof repair and replacement, bathroom renovations, retrofits to accommodate Tribal Elders with limited mobility, and ramp installations and repairs. He also brings expertise in plumbing, having worked on water projects related to providing potable water and wastewater for home and light industrial needs.

Bucky oversees a water systems overhaul to address plumbing issues involving up to 42 homes on the reservation. He provided the diagnosis of the plumbing deficiencies attributed to excessive corrosion of the water lines to the homes. Bucky has successfully maintained the viability of the plumbing in the affected homes until funds and resources are secured to conduct long-term

repairs to the water lines. His general knowledge of carpentry, plumbing, and wastewater, along with his ability to connect with Tribal residents, has aided in keeping the project moving forward as well as meeting the daily water needs of Members whose homes have been negatively impacted.

Since his arrival, Bucky has been involved in every housing maintenance project on the reservation. His specialized knowledge of the Tribal homes, Member residents, and the building needs for housing projects on the reservation has been invaluable. Bucky's projects have been done swiftly, thoroughly, and to the satisfaction of Tribal leadership and Members.

Bucky will be responsible for ordering, tracking, initiating, and completing any home repairs requested through the extended HAF program.

#### **4. What is your experience promoting racial equity?**

The Lower Elwha Klallam tribe's mission statement is "To build a strong and healthy sovereign nation where Tribal members live their values and culture." The tribe is led by a five-person elected business council, which decides the path forward for our community. The goal of every program and project the Tribe undertakes is to provide services and resources for the community to address the existing and inherited inequalities of tribal members.

As a tribal descendant, Nancy Hamilton advocates for the lower Elwha community and focuses on the tribe's services. She provides community members with access to LEKT's services. Nancy has experience working as an advocate for victimized community members, educating the community and region on the Missing and Murdered Indigenous People epidemic, and being a significant advocate for the LGBTQIA community. Nancy is a trusted member of the community and a tribal government employee who successfully ran the HAF program.

#### **5. What is your experience completing environmental reviews?**



Expanding the LEKT HAF program does not require completing an environmental review. However, the Tribe has successfully outsourced environmental reviews to meet all contracted requirements for other projects.

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

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

**1. Resources must be firmly committed as of the application deadline date.**

Salary of Nancy and Bucky  
Existing funds for HAF program

**Factor (e): Long Term Effect**

**1. Describe in your narrative the long-term effect of your proposal. A high-scoring narrative will be specific and clearly address the needs identified in Factor (a), with a clear positive effect expected well beyond the term of the PRICE grant's period of performance.**

- a. 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 you help current renters and homesite renters become homeowners or otherwise acquire an interest in the lot?**

The expansion of the HAF program is the first step in addressing an ongoing housing crisis in the LEKT community. While the Tribe plans and designs the needed infrastructure to construct new housing, we will expand the HAF program to include repairs and replacement of manufactured homes, depending on the existing conditions.

The HAF program will also be expanded to allow a down payment assistance grant program for qualifying tribal members. These conditions are being implemented to sustain the current housing in use for the Tribe while we plan, design, and gather resources to expand the housing opportunities for our community.

This proposed expansion will preserve the life of the manufactured houses owned by our tribal members in our service area.

- b. How will your proposed activities ensure the long-term affordability, including lot rents and other fees as applicable, of housing without future federal subsidies?**

Expanding the LEKT HAF program to ensure funds for repairs to manufactured homeowners will first ensure long-term housing affordability by preserving our existing housing stock. By providing funds for home repairs, the Tribe will help maintain the quality and safety of the existing housing stock, preventing properties from falling into disrepair and potentially becoming uninhabitable. This preservation reduces the likelihood of these homes being lost from the affordable housing inventory.

Well-maintained homes last longer and require fewer costly repairs in the future. This prolongs the usability of the housing stock, keeping more homes available for longer periods.

Expanding the home repair funding program will ultimately reduce homeowners' financial burden. Funds for repairs can cover essential maintenance and upgrades, reducing homeowners' out-of-pocket expenses. This can prevent low-to-moderate-income homeowners from selling their homes due to their inability to afford necessary repairs.

Our repair funds will address repair needs and help stabilize housing costs for homeowners, allowing them to budget more effectively without the fear of unexpected major repair expenses.

Expanding the Down Payment Assistance program will reduce the initial financial barrier to homeownership, making it more accessible to first-time buyers or those with limited savings. This enables more people to move from renting to owning, which can be more cost-effective in the long term. Increasing the amount of the down payment buyers can secure lower mortgage amounts, leading to lower monthly payments. This makes homeownership more affordable on an ongoing basis.

Homeownership allows individuals to build equity over time, serving as a financial asset and providing stability. This is particularly important for low-to-moderate-income households as it helps them build wealth and financial security, an opportunity that is extensively needed within the rural Native American community.

Homeowners are more likely to invest in their communities, contributing to neighborhood stability and potentially leading to higher property values. Stable neighborhoods are less prone to rapid gentrification, helping to preserve affordability. The expansion of the LEKT HAF program addresses both the immediate financial barriers to homeownership and the long-term maintenance needs of existing manufactured homes, significantly contributing to the long-term affordability of housing.

**c. How will your proposed activities promote stable homeownership options in the long-term, including both the house itself and the lot on which it sits?**

Expanding the LEKT HAF program promotes stable homeownership in the long term by addressing both the house itself and the lot on which it sits through maintaining and improving housing quality. Regular maintenance funded by grants ensures that homes remain structurally sound, preventing major issues that could make a house uninhabitable. This includes critical repairs like roofing, plumbing, and electrical work. Repair funds can fund necessary safety upgrades, such as replacing old wiring, fixing leaks, or removing hazardous materials like lead paint and asbestos, ensuring that homes remain safe for occupants.

Well-maintained homes retain and potentially increase in value, making them a more secure investment for homeowners.

Expanding the down payment assistance program lowers the upfront costs of purchasing a home, making it more accessible for low-to-moderate-income families. A larger down payment reduces the principal amount of the mortgage, resulting in lower monthly payments and making homeownership more affordable and sustainable over the long term. With a larger down payment, homeowners state more equity in their homes, providing greater financial stability and an asset that can be appreciated over time.

Grants can also be used to maintain the lot itself, addressing issues like landscaping, drainage, and foundational stability. This prevents problems like erosion or flooding that could damage the home and lot. Keeping homes and lots in good condition ensures compliance with local zoning and housing codes, preventing legal issues that could threaten homeownership.

The program addresses small repairs before they become large, costly problems, helping homeowners avoid financial strain that could lead to foreclosure and with lower initial and ongoing housing costs, homeowners are less likely to face financial crises that could force them to sell or foreclose on their homes.

These programs help reduce vacancy rates and blight in our community by keeping manufactured homes in good repair and making homeownership more accessible. They also contribute to overall community stability. When homes are affordable and well-maintained, homeowners are more likely to stay long-term, fostering a stable, cohesive community.

Home Repair grants can be used to improve homes' energy efficiency, such as upgrading insulation, windows, or HVAC systems. This reduces homeowners' utility costs and contributes to environmental sustainability.

**d. How will your proposal support underserved communities in the long term? How will your proposed activities advance housing access and justice for vulnerable populations or underserved communities? How will your proposal enable underserved communities, particularly those of color, to build wealth over the long term?**

This project will support the tribal community in the long term by advancing housing access and enabling tribal members to build wealth through several key mechanisms.

Firstly, by providing repair and revitalization funding for existing manufactured homes and down payment assistance for new purchases, the project addresses immediate housing needs while also establishing a foundation for long-term stability. Improved

housing conditions contribute to better health, education, and economic opportunities for tribal members, fostering community resilience and well-being over time. Additionally, by increasing homeownership rates among tribal members, the project enables them to build equity and generational wealth through property ownership, creating pathways to financial security and independence. Moreover, the project's focus on financial counseling and homebuyer education equips tribal members with the knowledge and skills needed to make informed financial decisions and maintain their homes effectively, ensuring the sustainability of housing access and wealth-building efforts in the long term. Through these comprehensive strategies, the project empowers the tribal community to thrive and prosper for generations to come, promoting enduring housing access and economic empowerment.

- e. **How will your proposal make manufactured housing or MHCs livable, sustainable, and resilient? Examples may include but are not limited to, long-term benefits of mitigation activities, weatherization, or infrastructure enhancement in MHCs. You may also describe how your proposal reduces resident health risks or exposure to environmental hazards.**

This project will make manufactured housing livable, sustainable, and resilient by implementing a multifaceted approach addressing various housing quality and durability aspects. Firstly, the project will focus on repairs and replacements to enhance the structural integrity and safety of existing manufactured homes. This includes addressing leaks, insulation deficiencies, and foundation stability to create a comfortable and healthy living environment. Additionally, the program will prioritize using sustainable building materials and energy-efficient upgrades to improve the environmental footprint of manufactured homes, reducing energy consumption and lowering utility costs for residents. Furthermore, by incorporating climate-resilient design principles and hazard mitigation strategies, such as wildfire-resistant materials and elevated foundations, the project will enhance the resilience of manufactured homes against extreme weather

events and natural disasters. Through these integrated efforts, the project aims to transform manufactured housing into resilient, sustainable, and livable dwellings that promote the well-being and longevity of tribal community members.

## **DRAFT – Lower Elwha Klallam Tribe Homeowners Assistance Fund Policy Amendments**

- I. Statement of Purpose
  - a. Purpose. The purpose of this amendment is to expand the LEKT HAF program. The expansion is specific to manufactured homeowners' assistance opportunities for tribal members of the Lower Elwha Klallam Tribe, as funding permits, by using Department of Housing and Urban Development funds to provide down payment assistance and home repair assistance to medium-to-low income manufactured households to assist in addressing the housing crisis faced by the Tribe. This program shall be administered by the Social Services Department and managed by the Community Liaison.
- II. Eligibility Requirement Update
  - a. For the purposes of the Down Payment Assistance and Home Repair Programs, applicants are not required to have experienced financial hardship after January 21, 2020.
  - b. For the purposes of the Home Repair and Assistance Program, the homes eligible for funding must be manufactured as defined by the US Department of Housing and Urban Development:
    - i. **Manufactured Housing:** A structure, transportable in one or more sections, which in the traveling mode is eight body feet or more in width, or 40 body feet or more in length, or which when erected onsite is 320 or more square feet, and which is built on a permanent chassis and designed to be used as a dwelling with or without a permanent foundation when connected to the required utilities, and includes the plumbing, heating, air conditioning, and electrical systems contained in the structure.
- III. Application Review Updates
  - a. Home Repair applications can be marked urgent to address safety and sanitation needs in an immediate capacity.
  - b. Applications for both the Home Repair and Down Payment Assistance programs will be reviewed in the order they are received giving elder tribal members precedence.
  - c. Applications for both the Home Repair and Down Payment Assistance programs will be reviewed on a case-by-case basis, in accordance with the funds available.
- IV. Qualified Expenses Updates
  - a. Eligible applicants who have received funds for (A) mortgage payments, homeowner utilities, or homeowners insurance through the original LEKT HAF program will receive renewed eligibility for the full \$10,000 through the Manufactured Housing Home Repair program.
  - b. The maximum amount for (B) one-time assistance is raised to \$10,000.00 per applicant for the Manufactured Housing Home Repair program.
  - c. Applicants of the Manufactured Housing Home Repair Program may be eligible for replacement funds at a total of \$275,000.00. Eligibility for replacement is determined by any of the following factors:
    - i. Insufficient size or strength of structure
    - ii. Weather exposure

## **DRAFT – Lower Elwha Klallam Tribe Homeowners Assistance Fund Policy Amendments**

iii. Sanitation/Health risks

iv. Discretion of the Lower Elwha Klallam Tribe Business Council

Applications for replacement funds will be reviewed and awarded by the Tribal Business Council.

- d. Down Payment Assistance will have a maximum of \$20,000.00.
- e. Down Payment Assistance will be a grant program operated by the Lower Elwha Klallam Tribe for the duration of available funds through the Department of Housing and Urban Development.



## **DRAFT – Lower Elwha Klallam Tribe Manufactured Home Repair & Improvement Assistance Program**

The Lower Elwha Klallam Tribe has established the following criteria to ensure that the Manufactured Home Repair & Improvement Assistance Program provides financial assistance within the scope of the established Policy.

This Program provides a benefit to adult Tribal Member homeowners, who own a manufactured home, in the tribe's service area, for home repairs and improvements, up to \$10,000 per eligible Tribal Member.

- A. To be eligible to receive this benefit, you must be:
  - a. An adult enrolled Lower Elwha Tribal Member 18 years of age or older;
  - b. The homeowner of the manufactured residence where the repair will occur; and
  - c. Occupying that home more than 51% of the year as your principal residence.
- B. The following are ineligible to receive the Benefit:
  - a. Tribal Members who rent but do not own their home.
  - b. Households with a minor Lower Elwha Indian child without an Adult Tribal Member.
  - c. Secondary homes, such as vacation homes or rental/investment properties.

### Application Process

- A. To apply to receive this benefit, you must complete this Manufactured Home Repair & Improvement Assistance Application, including:
  - a. Physical address/location information of the residence;
  - b. Proof of homeownership (e.g., mortgage statement, property taxes, or title/deed);
  - c. Documentation for the cost of the home repair or improvement.
- B. The Tribe may require you to provide additional documentation if the proof of home ownership is insufficient or inconsistent based on Tribal records. The Tribe may also determine homeownership according to financial responsibility on a case-by-case basis.

### Eligible Expenses

- A. Home Repair & Improvement Assistance is available up to \$10,000.00 per Tribal Member.
- B. The funding does not have to be accessed in a single transaction, but if the receipt or invoice submitted for an eligible request is less or more than the available benefit amount, only the documented amount will be issued
- C. Eligible expenses covered by the Benefit are strictly limited to costs of labor and supplies, plus associated warranties.
- D. To be treated as a General Welfare eligible expense for tax exemption, the repair must address one or more of the following:
  - 1. Water, sewage, or sanitation issues;
  - 2. Household plumbing and septic systems (including updating/enhancing);
  - 3. Water heaters (including updating/enhancing);
  - 4. Mold remediation;
  - 5. Electrical issues;

## **DRAFT – Lower Elwha Klallam Tribe Manufactured Home Repair & Improvement Assistance Program**

6. HVAC system repairs/enhancements and any repairs that address heating and cooling issues (including but not limited to window replacement, door replacement, etc.)
  7. Roof repair or replacement;
  8. Home foundation repairs;
  9. Accessibility improvements to the home (including but not limited to: wheelchair ramps, hand railings, grab bars, etc.); or
  10. Necessary basic repairs that are a direct health and safety concern, which will be assess by the community liaison and executive officers on a case-by-case basis.
- E. Manufactured Homes beyond repair may be eligible for replacement; replacement funds will be available for up to \$275,000.00 per eligible replacement manufactured home.
- F. Secondary eligible activities for this program include upgrades to household appliances (including stoves, ranges, woodstoves, dishwashers, refrigerators, washers, dryers, etc.) based on need.

### **Payment Options**

- A. **Reimbursement:** If you would like to request reimbursement for supplies or services purchased for an eligible home repair, you must provide an itemized receipt that lists you name and shows proof of payment.
- B. **Supplies-Only Vendor Payment:** If you would like the Tribe to pay a vendor directly for supplies, you must provide an invoice from an approved retailer. Following application approval, a purchase order or check will be executed directly with the vendor.
- C. **Services/Supplies Vendor Payment:** If you would like the Tribe to pay the contractor/vendor directly for your eligible home repair, you must provide an invoice and contract that outlines the scope and timeframe of work, as well as proof of contractor licensing and bonding, and a W-9 for the vendor.
  1. The Tribe will issue payment only as a third party on your behalf and will not be a part of any contracts, nor will the Tribe assume any responsibility to ensure that the terms of the contracts are properly carried out. It is your responsibility to verify the quality of work and maintenance of repair records.
  2. If you have already signed a contract for a repair and your application is denied, you are responsible for payment. It is recommended that you wait to sign a contract with the vendor until after your application has been approved.

### **Program Limitations**

- A. The Tribe is the payer of last resort for all funding provided under this Program; if the Tribal Member is also accessing a public program or non-repayable grant to help pay for the repair, the Tribe will only pay the remaining balance of the invoice after the other sources of funding have been applied.
- B. The Tribe may require repayment from the Tribal Member for any payments made on the Tribal Member's behalf to vendors for repairs that are not completed within 1 calendar year after the issuance of payment.

## **DRAFT – Lower Elwha Klallam Tribe Down Payment Assistance Program**

### **Criteria for Down Payment Assistance:**

1. To be eligible for the down payment assistance benefit, you must be:
  - i. An adult enrolled member of the Lower Elwha Klallam Tribe.
  - ii. Residing in the Tribe’s service area.
  - iii. Purchasing a manufactured housing unit
2. The following are ineligible for the down payment assistance benefit:
  - i. Incarcerated tribal members.
  - ii. Households that consist of a minor Lower Elwha Klallam child and that do not have an adult enrolled tribal member in the household.
3. To apply for down payment assistance, you must:
  - i. Complete a Down Payment Assistance Application;
  - ii. Provide a preliminary approval letter from the lender;
  - iii. If purchasing a mobile home, you must submit an approval letter of applicant acceptance to mobile home park or similar agreement if residing on private property;
  - iv. A purchase & sale agreement listing the Tribal Member applicant;
  - v. Initial estimated cost to close document listing the Tribal Member applicant;
  - vi. If a purchase is being made through a private party, a copy of the signed contract between vendor/buyer and seller listing the total sale price, and a W-9 for the vendor/seller;
  - vii. An appraisal completed by a qualified third-party vendor. The sales price must be consistent with the appraisal. The appraisal must be submitted to the Tribe and reviewed to determine amount of assistance for which the applicant is eligible; and
  - viii. If the purchase is being made through a home loan, wire transfer instructions for the down payment to be issued to an escrow account.
4. Upon closing, the Tribal Member must submit their final closing costs documents to Community Liaison to confirm home purchase. Failure to do so may result in the tribe treating the benefit as not used and seeking to recover the Down Payment Assistance payment.
5. Program benefits are subject to change and may increase/decrease based on available funding.

### **Program Requirements**

1. Funding is available for a singular transaction up to \$20,000.00 for Down Payment Assistance.
2. For Down Payment Assistance, the benefit may be used towards a manufactured home<sup>1</sup> (does not include purchase of land), or a Rent-to-Own purchase.
  - i. For purposes of this Policy, a “Mobile Home” shall mean a large trailer or transportable prefabricated structure that is situated in one particular place and used as a permanent living accommodation and expressly excludes recreation vehicles (RVS).
  - ii. Breakdown of usage will have to be shown on the initial estimated cost to close.
  - iii. Down payment/Deposits and costs associated with closing as listed on your estimated cost to close document/invoice/ or similar document provided by the lender or vendor are the only approval items.

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<sup>1</sup> Manufactured Housing: A structure, transportable in one or more sections, which in the traveling mode is 8 body feet or more in width, or 40 body feet or more in length, or which when erected onsite is 320 or more square feet, and which is built on a permanent chassis and designed to be used as a dwelling with or without a permanent foundation when connected to the required utilities, and includes the plumbing, heating, air conditioning, and electrical systems contained in the structure.

## **DRAFT – Lower Elwha Klallam Tribe Down Payment Assistance Program**

3. For construction loans, the benefit does not need to be accessed in a singular transaction due to different phases of the project but all payments must fit the description of down payment or deposit and all payments must be for the same build.
4. Down Payment Assistance benefit will be wire transferred to the escrow account for the purchase.
  - i. If the purchase is not being handled by a lender, i.e. a private mobile home sale the check will be issued directly to the seller and a valid W-9 must be provided.

### **Limits on Distribution**

1. Down Payment Assistance cannot be combined, only one benefit per home purchase.
2. Down Payment Assistance cannot be used to pay down principle, interest, taxes, etc. on existing mortgage or construction loan.
3. Down Payment Assistance cannot be used on the purchase of a recreational vehicle (RVs).
4. Down Payment Assistance cannot be used for raw land purchases.
5. Down Payment Assistance cannot be used to purchase a vacation home.
6. Down Payment Assistance cannot be used to pay for new construction to add to an existing home.
7. Earnest money is not an eligible expense for Down Payment Assistance.
8. The home being purchased must meet minimum property standards with concerns to safety, security, and soundness as outlined by U.S. Department of Housing and Urban Development.
9. The Tribe will not provide or submit a home purchase “gift letter” at any point in the down payment process, as this assistance is identified by the Tribe as a general welfare benefit.