

# OHCS Draft PRICE Main Application | June 2024

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## Narrative Exhibit A – Executive Summary

Oregon Housing and Community Services (OHCS) presents the following proposal to address the critical needs of manufactured housing residents across the state by braiding HUD Preservation and Reinvestment Initiative for Community Enhancement (PRICE) resources with state funds, OHCS staff expertise, and statewide community participation. Leveraging existing successful programs and state resources, OHCS aims to ensure long-term affordability, stability, resilience, and energy efficiency in manufactured homes and communities and serving the needs of low- and moderate-income (LMI) households. The proposal encompasses two primary current program frameworks: the Manufactured Home Repair and Rehabilitation Program (MHRRP) and Manufactured Dwelling Park Preservation (MDPP).

### *Threshold Requirements*

Oregon Housing and Community Services meets each threshold requirements in Section III D. and confirms it:

- ✓ has no outstanding civil rights matters as of the application submission deadline.
- ✓ has submitted this application before the deadline July 10, 2024, 11:59EST.
- ✓ is an Eligible Applicant as the Housing Finance Agency for the State of Oregon as outlined in ORS 813.112.
- ✓ is only submitting one application for the PRICE Main competition.

### *Need: Oregon's Housing Crisis*

OHCS estimates that 80 percent of the manufactured housing inventory in Oregon was built before 1995, and 40 percent was built before 1976, the year that HUD began regulating manufactured home construction standards. For Oregon, this means that a large portion of the manufactured housing stock is far past the intended life span, energy-inefficient, and unsafe.

Complex and interconnected, encompassing infrastructure deficiencies, financing limitations, high land values, and stigma, these barriers hinder the accessibility and affordability of manufactured housing options. With Oregon's engaged, experienced, and committed landscape of partners working together on manufactured housing in the state, the main barrier continues to be adequate resources to meet the scale of need.

### *Soundness of Approach: A Dual Strategy*

The *Manufactured Home Repair and Rehabilitation Program (MHRRP)* will focus efforts on repairing and revitalizing owner-occupied manufactured homes to address energy efficiency, resiliency, health, and safety challenges faced by low-income households. Through comprehensive screenings, inspections, and bid assessments, the program identifies repair needs

and provides financial assistance to maintain the value of the homeowner's asset, its naturally occurring affordability, and its place in the state's critical housing stock. Notably, the program offers forgivable loans for rehabilitation or replacement, ensuring affordability and sustainability for homeowners.

*Manufactured Dwelling Park Preservation (MDPP)* supports the preservation of manufactured home parks through infrastructure upgrades, rehabilitation projects, and tenant protections. With a focus on maintaining long-term affordability and preventing displacement, the program facilitates cooperative ownership models and provides financial assistance for park acquisitions. By addressing critical infrastructure deficiencies and empowering residents to take ownership of their communities, MDPP promotes stability and resilience in manufactured housing parks.

### *Vision and Goals*

Oregon is a national leader in manufactured housing development and preservation, supported by proactive policies, significant investments, and collaborative partnerships. The proposal aims to achieve several key goals, including wealth-building for LMI households, strengthening environmental justice efforts, promoting homeownership opportunities, increasing housing support across diverse geographic and demographic areas, and preserving and revitalizing existing manufactured housing communities. Through repair, rehabilitation, and replacement activities, OHCS seeks to enhance energy efficiency, resilience, and resident ownership models while exclusively benefiting LMI Oregonians.

### *Long-term Effect: Retention of Affordable Housing Options in Oregon*

Designed to ensure the long-term affordability of housing without federal subsidy, the proposed combination of targeted interventions, affordability enforcement mechanisms, and cooperative ownership models via both the *Manufactured Home Repair and Rehabilitation Program* (MHRRP) and *Manufactured Dwelling Park Preservation* (MDPP), the agency and its partners will continue creating an enduring impact on housing stability, affordability, and community resilience for low- and moderate-income households in Oregon. The proven outcomes from these bold efforts demonstrate that the proposed activities already have.

The following comprehensive proposal addresses the critical challenges faced by manufactured housing residents in Oregon. Through strategic partnerships, program modifications, and a clear focus on affordability and environmental sustainability, OHCS is poised to make significant strides in improving the quality of life for LMI households and preserving the long-term viability of manufactured housing communities across the state.

## Narrative Exhibit B – Threshold Requirements

*Applicants who fail to meet any of the following threshold eligibility requirements are deemed ineligible. Applications from ineligible applicants are not rated or ranked and will not receive HUD funding.*

### *1. Resolution of Civil Rights Matters*

*Outstanding civil rights matters must be resolved before the application submission deadline. Applicants with unresolved civil rights matters at the application deadline are deemed ineligible. Applications from ineligible applicants are not rated or ranked and will not receive HUD funding.*

### *2. Timely Submission of Applications*

*Applications submitted after the deadline stated within this NOFO that do not meet the requirements of the grace period policy are marked late. Late applications are ineligible and are not considered for funding. See Section IV. D. Application Submission Dates and Times.*

### *3. Eligible Applicant*

*Applicants must be an eligible applicant in accordance with Section III.A of this NOFO and must identify which type of eligible applicant they are in their application.*

*Multijurisdictional entities or other eligible applicants that wish to partner with other entities or one or several residents of an eligible community to implement their proposed project must demonstrate partnership among all parties. The parties may demonstrate a partnership or evidence of collaboration between the parties by attaching relevant documentation to an application, such as a legally binding development or cooperation agreement (this may include a CDBG joint agreement between an urban county and a metropolitan city or a HOME consortium agreement).*

*If an applicant wishes to engage in a partnership, all partners must submit a letter of intent to participate in the proposed project. The letter(s) of intent to participate and a binding cooperation, subrecipient or developer agreement, or a contract, as applicable and contingent upon award, must be included in the application. TDHEs and Tribal organizations applying on behalf of Indian tribes do not need to provide this documentation because they are applying on behalf of an Indian tribe and not as part of a partnership.*

### *4. Number of Applications*

*1. An eligible applicant may submit only one application and must specify whether it is applying for the PRICE Main category, the PRICE Replacement Pilot category, or both categories of funding. An eligible applicant that has submitted an application may also apply as part of a separate partnership application. However, no community or project may be assisted by more than one PRICE grant.*

*2. If HUD receives electronically multiple versions of an application, HUD will review the last version of the application received by Grants.gov that meets the timely receipt requirements. All other applications (i.e., prior versions) will not be considered eligible. If applicants find, after submitting an application, that they want to amend or adjust their application and it is prior to the deadline date, applicants must resubmit the entire application to ensure that HUD gets a complete application.*

### **Threshold Requirements Met**

Oregon Housing and Community Services meets each of the four threshold requirements in Section III D. of the PRICE Notice of Funding Opportunity.

- OHCS has no outstanding civil rights matters as of the application submission deadline.
- OHCS has submitted this application before the deadline: July 10, 2024, 11:59EST.
- OHCS is an Eligible Applicant as the Housing Finance Agency for the State of Oregon as outlined in ORS 813.112.
- OHCS is only submitting one application for the 2024 HUD PRICE Main competition.

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## Narrative Exhibit C – Need

*Factor (a): NEED (Maximum 15 points)*

*HUD is prioritizing proposals demonstrating: (1) need for affordable accessible housing options (including improved infrastructure and community amenities) in the project area(s) or subject communities described in the proposal, and (2) a clear and equitable focus on preserving and revitalizing manufactured housing to address the need described. HUD will rate more highly thorough and compelling proposals which address the need for affordable accessible housing by acquiring and installing, preserving, and/or rehabilitating manufactured housing or other housing types, including modular housing. Describe in your narrative:*

- *What is your project area and the need for affordable accessible housing within it? For a single site proposal, describe the subject community; or for a regional or national multi-site proposal, describe the subject communities or geographic areas. Also describe the need for affordable accessible housing within them; you may include data or other relevant information about the lack of affordable housing options, risk of conversion of one or multiple MHCs to unaffordable market-rate housing or non-residential uses, number of LMI households in need of affordable accessible housing, hazards that have or could potentially impact the availability of housing, existing health and safety issues caused by existing substandard housing, or existing manufactured housing that is substandard and/or dated.*

### **Oregon’s Affordable Housing Crisis**

The Oregon Housing Needs Analysis (2022)<sup>1</sup> – a multi-state agency report and set of recommendations – indicates that the state will need 550,000 additional housing units over the next 20 years to keep pace demand of a growing population. Oregon has a housing unit deficit of approximately 36,000 per year to meet the needs of the current population. In response to these figures and longstanding housing challenges across the state, Oregon Governor Tina Kotek declared a homelessness state of emergency in 2023. Among several executive orders issued at that same time, Executive Order 23-04 sets an annual statewide production goal of 36,000 new homes each year.

With PRICE grant funds, OHCS will be able to address the growing need for preservation, rehabilitation, and revitalization of older energy inefficient manufactured homes. Addressing the rehabilitation need of these manufactured homes provides the homeowner a safe and secure home which would otherwise be uninhabitable and leave the homeowner no alternative but to leave their home. Preserving these manufactured homes allows homeowners to keep this critical piece of the state’s critical housing stock for LMI families. One major factor is the rapid decay of older manufactured homes, a majority of which were built prior to 1976, making them ineligible for certain resources like weatherization grants.

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<sup>1</sup> [oregon.gov/lcd/housing/pages/ohna](https://oregon.gov/lcd/housing/pages/ohna)

The agency is in a unique position with a proven track record to continue making deeply meaningful statewide progress toward shared goals. As decades of underbuilding, under preservation of current housing stock, and increased natural disasters have contributed to the state's ongoing shortage, OHCS is acting with focus, determination, and speed in addressing housing construction, preservation, and funding challenges.

- *Deficiency of Affordable Housing Options*

According to the National Low Income Housing Coalition, Oregon has a shortage of over 130,000 affordable and available rental homes for low-income households. Internal data reports that nearly half of all renters in the state are considered cost-burdened.

- *Risk of Conversion of Oregon's Manufactured Dwelling Communities*

The loss of manufactured home parks to redevelopment poses a significant threat to affordable housing options for low-income residents in Oregon. The Network for Oregon Affordable Housing (NOAH) cites nearly 140,000 manufactured homes in Oregon with 62,000 located in a little more than 1,000 privately owned manufactured home parks.<sup>2</sup> CASA of Oregon, has identified approximately 8 parks that currently meet eligibility criteria for preservation; totaling roughly \$30 million in needs.

- *Low- and Moderate Income (LMI) Households in Need*

The U.S. Census Bureau reports that approximately 30 percent of Oregon households have incomes below 80 percent of the AMI, highlighting the substantial need for affordable housing options across the state. Internal OHCS data indicate that more than 100,000 households in Oregon are eligible for rental assistance but are unable to access it due to limited resources.

Internal data show that more than 80,000 manufactured homes in Oregon were built prior to 1980; 60,000 of these homeowners are low-income households at or below 80 percent AMI. A majority of homes located in preserved manufactured home parks in Oregon were built prior to 1995 when improvements in building and energy efficiency standards changed across the industry.

- *Hazards, Health, and Safety Issues in Substandard Housing Impacting Availability*

Oregon faces increased risks of wildfires, floods, and other climate-related hazards, which threaten housing stability and affordability. According to the Oregon Office of Emergency Management (OEM), the state experienced a record number of wildfires in recent years, displacing thousands of residents and destroying homes.

Residents of manufactured home communities are disproportionately impacted by environmental hazards such as poor air quality and contaminated water sources, further exacerbating housing challenges for vulnerable populations. A report by OHCS' Weatherization Program provided rehabilitation and repair services to more than 700 manufactured homes in the state in the last biennium that were considered substandard, lacking essential amenities such as central heating, adequate insulation, and functional roofs.

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<sup>2</sup> Network for Oregon Affordable Housing, [legislative testimony](#), [olis.oregonlegislature.gov](https://olis.oregonlegislature.gov), 5/12/23

- *Substandard and Dated Manufactured Housing*

OHCS estimates that 80 percent of the manufactured housing inventory in Oregon was built before 1995, and 40 percent was built before 1976, the year that HUD began regulating manufactured home construction standards. For Oregon, this means that a large portion of the manufactured housing stock is far past the intended life span, energy-inefficient, and unsafe. By today's manufactured home standards, there is a significant need to replace the majority of manufactured homes in Oregon.

OHCS data show that many manufactured home parks lack basic infrastructure and amenities, such as paved roads, street lighting, and community facilities, further impacting the quality of housing for residents.

#### *Manufactured Home Repair and Rehabilitation Program Needs*

OHCS' Disaster Recovery and Resilience Division (DRR) is currently administering ReOregon: a suite of new programs to help individuals, households, and communities continue to recover and provide new permanent housing in the areas most impacted by the 2020 Labor Day wildfires through CDBG-DR funds. OHCS DRR Division and CDBG-DR resources did not become available to 2020 Labor Day Wildfire survivors, the homeowners who lost their manufactured homes in the fires, until 2023. In response to the urgent need to replace these homes, and the absence of designated natural disaster funding, the newly launched the *Manufactured Home Replacement Program* began allocating program funds in 2020 to assist with the replacement of manufactured homes of wildfire survivors. A total of 42 percent of the \$6.8 million in allocated resources for the Homeownership Division's *Manufactured Home Replacement Program* were shifted to replace manufactured homes, regardless of age or condition prior to the fires, that were lost to wildfires. OHCS has maintained an unwavering commitment to serving these survivors and recognize that this funding shift left significantly fewer resources available to other LMI owners of older, energy inefficient, unsafe, and unhealthy, manufactured homes.

Legislative funding was renewed at a lower level in 2023 and the *Manufactured Home Replacement Program* was fully expended within the first six weeks of the 2023-2025 biennium. The program was able to assist 19 income-qualified LMI owners of manufactured homes and received more than 80 additional income-qualified applications that the agency will address when resources are available. The program's general voicemail and email continues to receive inquiries from owners of deteriorating manufactured homes suffering from leaking roofs, unstable/caving floors, plumbing issues, exposed wiring, mold, and mildew, among other health and safety hazards. Those contacting OHCS are LMI homeowners seeking assistance to repair or replace their homes because they have few to no other sources of funds to do so themselves and no alternative housing options.



## *Manufactured Dwelling Park Preservation Needs*

External partners have helped identify the current need for parks – identified as ready and eligible for preservation – to be approximately 8 parks with \$30.8 million. They emphasize that this is a very conservative estimate. While we will not be able to preserve every park in Oregon with PRICE grant funds, the \$12.5 million dedicated for preservation would be lifechanging for hundreds of Oregon families.

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*• Is your project within or does it include any communities that meet Distress Criteria? Distress criteria are defined in 12 CFR 1805.201(b)(3)(ii)(D) (Certification as a Community Development Financial Institution) and include communities with high rates of poverty, low income, high unemployment, and population loss. If your project is within or includes a community that meets one or more Distress Criteria, describe the issue(s) and their impact on the availability of housing. You may provide data and data sources in your description of issue(s) and impact on the availability of housing.*

Seventy percent of counties in Oregon meet the Distress Criteria.<sup>3</sup> A significant percentage of manufactured homes are located within these counties. According to CAA partners, who regularly work on weatherization repairs on homes in the communities they serve, a remarkable number of manufactured homes require repair and/or rehabilitation for residents to remain in the home safely.

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*• Does your proposal increase resilience in any disaster-prone areas? Is the area in or inclusive of a census tract identified as a [Community Disaster Resilience Zone](#), as defined by FEMA? If so, what future risks do the communities served by your proposal face due to natural hazards, extreme weather, and disasters such as flooding, wildfires, heat, severe storms, etc.?*

### **Disaster Resiliency for Oregon's Wildfire Season**

The 2022 wildfire season had a devastating for the State of Oregon. Several fires caused catastrophic damage to the manufactured housing inventory throughout the nine wildfire affected counties. According to CASA of Oregon, 1,500 manufactured homes were destroyed, 18 manufactured home communities were either destroyed or severely damaged. Approximately 6,000 manufactured housing residents were displaced.

In response to this tragic fire season, many manufactured home producers in Oregon offer homes that are built to Exterior Fire Resistive Construction System Certification. With a modest price

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<sup>3</sup> [oregon.gov/biz/reports/pages/distressedareas](https://oregon.gov/biz/reports/pages/distressedareas)

increase, these standards include fire Class A roofing materials, non-combustible cladding, soffits with spark ember arresting vents, and fire rated tempered windows.

Since 2020 wildfire season, Oregon's building codes, for fire prone areas, have drastically changed. There are now requirements for outdoor building materials, escape ingresses, and expanded home ignition zones.

In addition, Oregon has experienced severe weather, and small seismic events. In response to this. Oregon has changed building codes for manufactured homes in or near flood plains and increased seismic placement codes. Requiring manufactured homes, in or near flood plains to be placed on stilts, and or other flood mitigating requirements. Building codes have also increased tie down and strapping standards to decrease the amount of damage during a seismic or weather event.

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*• What are the barriers to manufactured housing preservation or revitalization in your project area? Barriers may include land use controls, insufficient infrastructure, insufficient access to materials and shipping logistics for remote and rural areas, permitting procedures and fees, perceived poor quality, low financing availability to purchase units and/or lots, local or political opposition to manufactured housing, low resident organizing or self-governance capacity, and high land values prohibitive for purchase by LMI households wishing to site a manufactured home. For non-Tribal Applicants, describe the protected class groups in your project area that lack access to safe and healthy affordable housing and the barriers to AFFH that create a lack of opportunity for them. Barriers may include existing patterns of segregation in the community, lack of opportunity in racially or ethnically concentrated areas of poverty, and discrimination.*

### **Barriers to Manufactured Housing Preservation and Rehabilitation in Oregon**

Complex and interconnected, encompassing infrastructure deficiencies, financing limitations, high land values, these barriers hinder the accessibility and affordability of manufactured housing options. With Oregon's engaged, experienced, and committed landscape of partners working together on manufactured housing in the state, the main barrier continues to be adequate resources to meet the scale of need.

#### *Timing and Sufficient Resources*

As with multifamily rental properties, many manufactured home parks can fetch a higher price on the open market making a timely and nimble response from public funders is essential to successfully competing with for-profit buyers. Limited financing options for purchasing manufactured homes, lots, and cooperative ownerships present barriers to homeownership for low- and moderate-income households. Oregon's housing stakeholders often advocate collectively at the local, state, and federal level for manufactured housing resources put to use as bridge loans for manufactured home communities to preserve affordability in their parks and avoid conversion to market-rate housing development. While bridge financing from other

nonprofit lenders has been essential to facilitate cooperative and nonprofit partners acquiring projects, all partners would benefit from more clarity and certainty about OHCS' ability to financially back some of these transactions.

### *High Land Values*

The state has experienced rapid increases in land values in recent years, particularly in urban areas. These high land values make it prohibitive for low-income households to purchase land for siting manufactured homes, exacerbating housing affordability challenges.

### *Infrastructure*

Many manufactured home parks in rural Oregon and remote areas lack essential infrastructure such as water and sewer systems, roads, and utilities, making it challenging to preserve and revitalize these communities.

### *Stigma*

One of the key barriers to greater investment in the state's manufactured housing stock for repair and rehabilitation needs is a lingering negative perception that is not in keeping with the vast improvements in quality that have been made over time. Educating elected officials and other key decision makers in policy surrounding manufactured housing is necessary to assist in shifting toward greater awareness of the advantages manufactured housing brings to the table.

## Narrative Exhibit D – Soundness of Approach

*Factor (b) SOUNDNESS OF APPROACH (Maximum 50 points)*

*HUD is prioritizing proposals that (1) provide a clear vision and specific goals, and (2) explain how affordability will be preserved and environmental threats mitigated. HUD will rate proposals which demonstrate sound planning and implementation practices that preserve and/or create long-term housing affordability for manufactured housing residents more highly.*

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

- *What are your vision and goals?*

*A successful proposal will clearly articulate your vision and goals and provide details about the specific activities you wish to undertake that will create, preserve, or revitalize (including reconstruction using other construction methods) manufactured houses and ensure their availability and affordability to LMI households now and in the long-term. If you are proposing what you feel is a particularly innovative way to revitalize affordable housing, please describe why it's innovative and the added benefit to beneficiaries. Additionally, you should describe how the proposed activities are eligible and meet a National Objective (see Section III.F of this NOFO). For a single site, include physical descriptions, geography, map(s), and as applicable, connection to community amenities and utilities. For a regional or national multi-site proposal, also include a general description of the criteria used to select and common characteristics of the communities included in your proposal. For both single site and multi-site proposals, identify the current landowners of any proposed project site(s) and their role in, and/or relationship to any proposed activities.*

### **Vision: A Dual Approach**

Oregon is a national leader in manufactured housing development and preservation, and Oregon Housing and Community Services (OHCS) offers a suite of programs tailored to address the diverse needs of manufactured homeowners, residents, and park communities across the state. Oregon's longstanding commitment to manufactured housing is demonstrated through proactive approaches to policy development, significant state and local resource investment, and collaborative partnerships with experienced stakeholders.

To most effectively administer and rapidly deploy PRICE Main grant resources ensuring long-term affordability, resilience, energy efficiency, and housing stability, OHCS plans to modify two current, successful program frameworks to conform to HUD PRICE requirements and continue equitable, transparent statewide opportunities to access funds.

Both the *Manufactured Home Repair and Rehabilitation Program (MHRRP)* and *Manufactured Dwelling Park Preservation (MDPP)*, with program modifications outlined below, achieve several key shared goals of the agency and the PRICE NOFO.

### *PRICE Manufactured Home Repair and Rehabilitation Program (MHRRP)*

The OHCS PRICE *Manufactured Home Repair and Rehabilitation Program* is designed to repair and revitalize owner-occupied manufactured homes with deferred maintenance that creates energy efficiency, health, and safety challenges for low-income households. The MHRRP is a flexible program working to restore these homes for stable occupancy of the homeowners, maintain long-term affordability, and retain the value of the asset.

#### *Program Framework*

- 1) An application is completed by a homeowner and is then screened for household income eligibility. Then both ownership and occupancy of the manufactured home are verified.
- 2) The application screening is followed by a thorough inspection of each home – conducted by a professional trained in manufactured home weatherization and construction – to assess the total repair needs.
- 3) Bids from local contractors are reviewed and applicants are referred for either repair or replacement. The home repair project will meet health, safety, sustainability, and energy standards. Should the cost to repair a participating home exceed \$35,000 for a single wide manufactured home and \$60,000 for a double wide manufactured home, the home is referred for a forgivable rehabilitation/replacement loan.
- 4) If the total cost of repairs exceeds the housing affordability and energy efficiency savings achieved through repairs, then the participating home is referred for replacement. Owners of manufactured homes built prior to 1976 are automatically referred for a forgivable rehabilitation/replacement loan.

#### *Key Program Elements*

- Experienced Staff and Established Program Structure.  
OHCS currently administers a successful *Manufactured Home Replacement Loan Program* (MHRP), launched in 2019. The *Manufactured Home Repair and Rehabilitation Program* will complement the MHRP by leveraging existing staff, partner networks, and program structures.
- Manufactured Home Program Navigator.  
Participants referred for forgivable loans are paired with the OHCS manufactured home program navigator to guide them through the process. The program navigator assesses all resources available to homeowner applicants and pairs a 15-year forgivable, no interest, zero payment loan. The loan amount will be determined by need via income verification and an assessment of other resources that may be available to the homeowner (e.g., grants, savings, or bank loans). The program navigator helps the homeowner gather bids from contractors in

their area to build an estimate for their home rehabilitation or replacement project.

- **Partnerships.**  
The MHRRP will also utilize Oregon’s network of 17 Community Action Agencies (CAAs) serving communities statewide with energy efficiency incentive and weatherization programs. These partners will serve to audit the repair needs of participating homes, referral for rehabilitation/replacement, and help determine if a repair project exceeds project cost thresholds. All applicants will be referred to OHCS programs through direct-service providers.
- **Eligibility Criteria.**  
All MHRRP participants must have a household income below 100 percent AMI. To date, 75 percent of MHRP participant households have been below 50 percent AMI.

*Current Manufactured Home Replacement Program Selection Criteria and Proposed PRICE Repair and Rehabilitation Program Modifications*

- Applicants must own the current manufactured home and use it as their primary residence to qualify for replacement. OHCS does not replace second homes, rental properties, or vacation homes.
  - PRICE modification: this eligibility criterion will be used for the new repair/rehabilitation prioritization component.
- Applicant’s current manufactured home must be energy inefficient/built before (NEEM Rated) 1995 to be eligible for replacement.
  - PRICE modification: homes built prior to 1976 will be replaced according to PRICE guidelines. All manufactured homes built after 1976 will be eligible for PRICE repairs.
- Applicant’s manufactured home must be located on personally owned property, in a cooperative or nonprofit owned park, or in a privately owned park that has a written affordability agreement with OHCS.
  - PRICE modification: this eligibility criterion will be used for the new repair rehabilitation prioritization component.
- Applicant’s household income must be at or below 100 percent of Oregon's AMI: \$72,000 for a family of two in 2022.
  - PRICE modification: household income eligibility will adhere to HUD rules. Participants must commit in writing that should they sell their home before the end of the 15-year forgivable loan term that they will comply with one of the following:
    - a) pay the outstanding balance of the loan;
    - b) sell the home to an income qualified buyer who agrees to assume the loan; or
    - c) demonstrate a hardship impeding homeowner’s ability to pay back the loan (e.g., death)

- PRICE modification: recipients must sell their home to another MHRRP eligible buyer.

### *Manufactured Dwelling Park Preservation (MDPP)*

OHCS' *Manufactured Dwelling Park Preservation* efforts support the preservation of manufactured home parks through acquisition of existing manufactured parks to keep them affordable for the long term, invest in infrastructure upgrades, rehabilitation projects, and implement tenant protections. This includes initiatives to address critical infrastructure deficiencies, such as water and sewer system upgrades, road improvements, and utility service enhancements, as well as policies to prevent displacement and ensure long-term affordability for residents.

Oregon has been a national pioneer in another creative long-term preservation strategy for these communities: helping residents form a cooperative to buy and operate their park together. When a cooperative forms and acquires the park, addressing basic deferred maintenance issues is bundled into the deal. Residents of a park owned by a nonprofit or a co-op benefit from long-term predictability about the future of the park and the cost of their housing and gain a voice in how their community is managed. Since 2011, OHCS has helped 33 manufactured home communities preserve affordability.

### *Program Framework*

Park communities that are ready to organize as a cooperative or a nonprofit entity seeking financing to purchase a park typically work with a CDFI that offers agile bridge loan products. Communities will then seek resources for preservation from OHCS to replace the bridge loan with permanent financing in form of a forgivable grant with deed restrictions.

- 1) An applicant submits an intake form to OHCS, and an account is created.
- 2) OHCS staff reviews application materials to ensure MDPP requirements and eligibility criteria are met.
- 3) When program requirements are met, and supplemental documentation is submitted, OHCS staff review and bring the project to OHCS' Finance Committee for final approval.
- 4) Assuming OHCS has sufficient preservation resources, applicants are awarded upon Finance Committee approval.

### *Manufactured Dwelling Park Preservation Key Program Elements & Criteria*

- For cooperatives and nonprofits, a purchase or sales agreement must be reviewed by OHCS.

- Affordability restrictions enforced through deed restrictions require that at least 60 percent of the park spaces are rented at lease-up to residents earning 80 percent AMI or less for at least 60 years.

### *Goals for Proposed Activities*

With this dual approach to preservation, rehabilitation, and repair, the agency will continue to respond to the greatest needs across the state with efficiency and good financial stewardship. Through modifications and pairings with current programs, PRICE funds will allow OHCS to continue its work toward these mutual goals:

- *Wealth-building and wealth protection for LMI households:* preservation ensures that current homeowners are not priced out of their communities by facilitating the purchase of the park by residents or a nonprofit entity. Repair and rehabilitation efforts will help homeowners protect the value, health, and safety of their home.
- *Strengthen Environmental Justice efforts:* Repair and rehabilitation resources will allow the agency to assist more homes in the removal toxic materials from older manufactured homes as well as assist with energy upgrades that will lower carbon emissions. Repairing, rehabilitating, and replacing substandard manufactured housing will provide residents with healthy homes and reduce health risks associated with asbestos, black mold, and lead. Park preservation will address deferred infrastructure maintenance issues that often have life-threatening impacts on tenants.
- *Promote homeownership opportunities:* Through the repair and rehabilitation of current manufactured homes coupled with funds for replacement of homes built prior to 1976 (or in a condition such that rehabilitation is not feasible) with new, energy efficient manufactured homes, homeowners' assets will remain valuable, affordable, sustainable, and healthy for future LMI home buyers.
- *Increase housing support and affordability to LMI persons across Oregon including urban, rural, and tribal lands:* Proposed activities prioritize statewide access and equitable distribution of resources. Oregon's current manufactured housing inventory is evenly distributed between rural and urban communities. By repairing and rehabilitating homes in Oregon, we can work ensure the distribution of resources throughout the state. The 17 CAAs providing repair and rehabilitation are located in all 36 counties across Oregon.
- *Preserve and revitalize existing manufactured housing and manufactured housing communities:* Both current preservation and replacement activities protect the state's current manufactured housing stock, and with the addition of PRICE funds these efforts will go further and include repair and rehabilitation activities.
- *Support repairs, rehabilitation, and replacement of Oregon's deteriorating manufactured homes:* Estimates in Oregon indicate that roughly 80 percent of all manufactured homes in



the state were built before 1980. Roughly 60 percent of these pre-1980 manufactured homes in Oregon are owned and occupied by families with household incomes below 80 percent of AMI. The proposed activities represent the agency’s statewide view of the most pressing needs and opportunities for most sustainable impact.

- *Energy efficiency and resilience:* By repairing and rehabilitating aging, maintenance deferred manufactured homes, replacing pre-1976 manufactured homes with energy-efficient homes, and investing in infrastructure upgrades, OHCS will enhance the sustainability and resilience of manufactured housing communities, reducing utility costs for residents and mitigating environmental impact and updating health and safety standards.
- *Resident and nonprofit ownership Models:* Preservation resource programming supports resident ownership models, such as cooperative ownership and limited equity cooperatives, to empower residents to gain a voice in how their community is managed, build community wealth, and preserve affordability for future generations.

#### *National Objective – Activities Exclusively Benefit LMI Oregonians*

The programs outlined above will serve to solely benefit LMI Oregonians at 80 percent AMI or below. Forgivable loans offered through the *Manufactured Home Repair and Rehabilitation Program* will be awarded only to those homeowners earning 80 percent of the AMI or below. If the homeowner sells their manufactured home before the end of the 15-year loan, they may be required to repay a prorated loan amount. New income qualifying homeowners may choose to assume the remaining term of the forgivable loan. This ensures a minimum, 15-year affordability period. Through *Manufactured Dwelling Park Preservation* efforts, only communities with 60 percent of residents earning 80 percent AMI are eligible for cooperative revolving loan and revitalization resources.

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

*Describe the activities you will undertake, how they will address existing need(s), and why they are an ideal solution to address the need(s). Describe how your proposal ensures housing stability for displaced residents and how their long-term housing stability will be ensured. Finally, describe whether units will be reserved for households assisted under other HUD affordable housing programs serving the needs of low-income households such as eligible Housing Choice Voucher (HCV) recipients, or the Indian Housing Block Grant (IHBG).*

#### **Activities to Address Oregon’s Manufactured Housing Needs**

The number of applications for the 2023-2025 biennium received for the *Manufactured Home Replacement Program* quickly oversubscribed the \$2.5 million in resources allocated to the

program. A significant number of repair requests, reaching upwards of 700, continue to go unaddressed.

As of January 2024, the program received 75 replacement applications that cannot be served, and the Program continues to receive applications weekly. PRICE funds will address current and future requests. OHCS expects to continue to receive requests for repair and replacement through the 2023-2025 biennium and beyond.

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

*Demonstrate a clear and thoughtful planning process by providing the order and duration of the activities and key tasks described in your proposal. For regional or national multi-site proposals, also describe if and how you will cascade work across different sites.*

### **Timeline and Key Tasks**

Both programs will require alignment with PRICE rules and will need to be reviewed and updated through state and agency processes. When projecting out this work, three key tasks have been identified, in order:

- Update Oregon Administrative Rules (OARs) in order ensure public transparency with regard to changes to current programs needed be in compliance with PRICE rules.
- Notify the Oregon Housing Stability Council of announcement of award. The Council, with the advice of the Executive Director of OHCS, meets monthly to direct policy, and has approval authority on program frameworks and standards for those supported with state resources and certain loans and grants.
- Oregon Department of Justice (DOJ) review will be required to approve loan and grant agreements that will be used for PRICE programs. To expedite the DOJ review process, the agency will use current templates to build in PRICE adjustments.

All three of these tasks are anticipated to be completed within six months from notice of award.

### *Manufactured Home Repair and Rehabilitation Program (MHRRP) Tasks*

- The *Manufactured Repair and Rehabilitation Program* team will coordinate with the Energy Services Section to begin outreach with CAAs and nonprofit partners to contract for manufactured home assessment.
- The Manufactured Housing Section of OHCS' Homeownership Division will partner with the existing network of CAAs to provide assessments and referrals to OHCS for review.
- These staff will also partner with the Energy Services Section to identify other manufactured homes needing repair and rehabilitation.

### *Timeline*

The *Manufactured Repair and Rehabilitation Program* is following the successful *Manufactured Home Replacement Program* model. Staff project that the new MHRRP will be ready to launch in early 2025. The MHRRP will run to complement the *Manufactured Housing Replacement Program* with current staff expertise and resources.

### *Key Dates*

October 2024 – PRICE Awards Announced

- Schedule meeting with partners and CAAs to determine funding allocations, scope of work, and next steps.
- Discuss applications and documentation processes.
- Review assessment and referral processes.
- Establish invoicing and tracking of project completion.

November 2024 – State and Agency Processes

- Draft revised Oregon Administrative Rules (OARs) to comply with all PRICE grant requirements.
- Consult with DOJ and finalize approval process and required documentation.

January 2025 – Launch Manufactured Home Repair and Rehabilitation Program

### *Manufactured Dwelling Park Preservation (MDPP) Tasks*

- Update program requirements to ensure that the current program framework complies with PRICE funding and federal requirements.
- Update all application materials to include federal requirements.
- Planning for completion of environmental review requirements
- Draft new a program manual outlining all requirements, including federal PRICE rules.
- Ensure grant agreements include federal requirements.

NOTE: In cases where applicants cannot meet PRICE rules (e.g., established park will not meet an environmental review) OHCS will work with applicants to secure separate resources.

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

*As applicable, clearly describe increased opportunities to access quality affordable housing, enhanced resilience of manufactured and other homes, enhancements to MHCs (e.g., infrastructure and services provided), retention of or increases to the availability of unsubsidized affordable housing, and overall benefit to the community or project area you wish to support.*

## Projected Activity Impact

As outlined in the Proposed Activity Goals section above, OHCS' manufactured housing programs are strategically designed to address the unique needs of Black, Indigenous, and People of Color and other underserved communities and individuals.

### *Manufactured Home Repair and Rehabilitation Program (MHRRP)*

In 2023, OHCS administered a \$6.8 million program to replace 70 homes for 70 families across Oregon. Thirty-four of those replacements were for families who lost their homes due to a natural disaster. A total of \$2.5 million was allocated to the program in the 2023-25 biennial budget which was exhausted within the first two months of the program. With PRICE grant funds, the agency estimates that approximately 500 low-income Oregon families could be served for repair and rehabilitation of their homes.

### *Manufactured Dwelling Park Preservation (MDPP)*

With PRICE resources designated for park preservation, OHCS estimates that its grant request could serve nearly 450 households per external partners estimates and recent summary of funding needs. On average, park preservation has ranged around \$55,000/space. The PRICE funding would offer much increased availability of funds to ensure that people living in manufactured parks can stay in their owned, affordable housing long term. This would enable seniors to age in place and other low-income households to have a sustainable and affordable place to live.

In some small rural communities in Oregon, manufactured parks may be one of the only options for affordable homeownership. The MDPP program supports preservation of this resource through provision of funding for acquisition of parks by nonprofits and resident-owned cooperatives as well as infrastructure improvements.

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

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

*Describe how you will balance affordability with the opportunity to build financial security and wealth for manufactured homeowners and if applicable, how you will encourage their lot ownership for the siting of manufactured homes. Applicants should consider how the land ownership ties into the opportunities you plan to create and how this ensures long term affordability. Finally, describe how the affordable homeownership and/or rental opportunities you plan to create will remain affordable for at least 15 years and be promoted to LMI households and protected classes.*

## Ensuring Affordability and Equity

Enforcing affordability requirements and creating income-restricted housing options for low-income Oregonians is the cornerstone of OHCS' mission. The agency accomplishes this through formal written binding agreements with recipients of public funds, leveraging federal, state, and local resources to provide funding packages for affordable housing development, and OHCS will balance affordability with the opportunity to build financial security and wealth for owners of manufactured homes through maintaining and improving their current home asset by receiving a repair and rehabilitation grant, or through replacement of their home with 15-year forgivable, no interest, zero payment loans in the MHRP program.

This program offers affordable financing options tailored to the needs of LMI households and their available personal resources. By providing access to sustainable public financing, we empower LMI households to sustain homeownership while building equity and wealth over time.

Park preservation through MDPP resources provide financial support for the acquisition and preservation of at-risk manufactured home parks as affordable housing assets. By facilitating park preservation, we ensure the long-term affordability of manufactured housing options for LMI households while also creating opportunities for homeowners to build equity and wealth through homeownership.

Manufactured housing within preserved parks will be subject to affordability requirements, including income eligibility criteria, tenant rent rules, and resale restrictions to ensure continued affordability for at least 60 years.

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

- *HUD expects that in communities where the tenant of a manufactured housing unit rents the unit and/or the pad, the community will maintain or adopt tenant site lease protections consist with or greater than those required by Fannie Mae or Freddie Mac. Examples of applicable requirements include:*
  - ❖ *Notice of rent increases*
  - ❖ *Renewable leasing structures*
  - ❖ *Right to purchase or sell*
  - ❖ *Right to sublease*
  - ❖ *Advanced notice of planned sale or closure of a community*
- *Define how your activities will protect residents from lot rent and/or fee increases, relocation, eviction, paying arrearage, and other adverse actions. This may include, but is not limited to, updating local ordinances to protect residents of manufactured homes from eviction, informing them of their rights, providing housing or legal counseling, or land acquisition. Describe as applicable how these protections align with federal civil rights laws, including the Fair Housing Act, [Fannie Mae or Freddie Mac](#) tenant protections, [The White House Blueprint for a Renters Bill of Rights](#), as well as state, local, or Tribal laws, and*

*regulations applicable to the community or communities being served. For regional or national multi-site proposals, describe state, local, or Tribal laws and regulations, and how your proposal aligns to each. Finally, if your activities involve resident displacement, for example because of disaster resilience buy-outs, how will you ensure affected homeowners get fair market value for their home and ensure all residents (owners and renters) are able to relocate to another home nearby or have opportunities to purchase replacement units?*

## **Resident Protections through Proposed Activities**

### *Manufactured Home Repair and Rehabilitation Program (MHRRP)*

The Manufactured Home Repair and Rehabilitation Program eligibility terms require that participating homes be located in a nonprofit or cooperative owned facility, on private land owned by the program participant, or in a privately owned manufactured home park that has entered into a written regulatory agreement with OHCS. Significant marketing efforts will be placed for MHRRP in nonprofit, cooperative owned preserved parks as these facilities are committed contractually to maintaining affordable space rent and income eligibility limits for residents.

The Manufactured and Marina Communities Resource Center offers two protection programs currently in place for owners in manufactured home parks. One offers grant resources to support dispute resolution/mediation services offered to residents and landlords of manufactured home park communities. In mediation, the disputing parties work with a neutral third-party mediator to help resolve disputes. The mediator facilitates the resolution of the parties' conflicts by supervising thoughtful communication. The second program offers legal and education services for tenant and landlord rights as well as assists with legal disputes in manufactured home parks.

### *Manufactured Dwelling Park Preservation (MDPP)*

Park preservation complements a whole series of policy successes for park residents: rent increase notice requirements, rent increase restrictions, right to purchase, tax credits for owners when selling parks to nonprofits and cooperatives. Coupled with the park improvements, residents in preserved parks can feel secure in their housing because they *are* secure.

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

*Characteristics of underserved communities and persons may include those living in poverty, lacking a vehicle, or living in overcrowded homes, among others. If applicable, describe how your proposal will increase accessible and affordable housing opportunities for individuals with disabilities and how it will support integrated and independent living with access to voluntary supportive services such as health services and transportation.*

*How will you provide opportunities to low-income individuals? Describe as applicable how your project will provide economic opportunities to low-income individuals and your history of hiring, training, contracting, and providing other economic opportunities in furtherance of Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and its implementing regulations at 24 CFR part 75.*

## **Resources for Underserved Communities in Oregon**

### *Manufactured Home Repair and Rehabilitation Program (MHRRP)*

The program will offer repair and rehabilitation grants and no interest, zero payment, 15-year term, forgivable loan financing for manufactured home replacement when repair and rehabilitation is not feasible or for homes built prior to 1976. Resources will be distributed via CAAs located throughout the state of Oregon and will work closely with underserved communities. Most CAAs offer applications and program information in languages other than English and can offer assistance for those who are not able to fill out forms on their own.

### *Manufactured Dwelling Park Preservation (MDPP)*

Manufactured home parks are a critical reservoir of housing that is affordable to tens of thousands of Oregonians and often the only affordable homeownership opportunity available to lower-income households. Residents of a typical park are extremely vulnerable to increases in space rent, especially when ownership of the park changes, and in the worst-case scenario can go from homeowners to homeless overnight.

As the outdated “mobile home” nomenclature reveals, manufactured homes are rarely moved after initially installed in a park, and an owner who can no longer afford space rent is likely to walk away from their home and important asset because it is not feasible to move it. When a park’s residents are forced out by rising rents or when a park is redeveloped the displacement of a settled community it is often irreplaceable. The security offered by cooperative or nonprofit ownership models is priceless.

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

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

*For each significant hazard, describe hazard mitigation activities you will undertake to enhance the resilience of manufactured homes or associated infrastructure. You may wish to consult the Federal Emergency Management Agency (FEMA) [National Risk Index](#), [Hazus Program](#), [Resilience Analysis and Planning Tool](#), and [Community Disaster Resilience Zone Platform Tools](#). Additional resources may be found in FEMA’s [Recovery and Resilience Resource Library](#).*

## **Hazard Mitigation**

In addressing significant hazards that could impact manufactured housing sites, OHCS recognizes the importance of proactive hazard mitigation activities to enhance the resilience of manufactured homes and associated infrastructure. The following are the significant hazards considered and the corresponding mitigation activities:

### *Natural Disasters (e.g., earthquakes, floods, wildfires)*

- **Seismic Retrofitting:** Implement structural enhancements to manufactured homes to withstand seismic forces, including foundation anchoring systems, bracing, and reinforcement of structural elements.
- **Floodplain Management:** Conduct flood risk assessments and implement floodplain management measures, such as elevating manufactured homes, constructing flood barriers, and implementing stormwater management systems.
- **Fire Mitigation:** Implement fire-resistant construction materials and landscaping practices, create defensible space around homes, and establish emergency evacuation plans to mitigate the risk of wildfires.

### *Extreme Weather Events (e.g., hurricanes, tornadoes, severe storms)*

- **Wind-resistant Design:** Retrofit manufactured homes to improve resistance to high winds, including installation of wind-rated roofing materials, window shutters, and tie-down systems.
- **Stormwater Management:** Implement stormwater management measures, such as drainage systems, retention ponds, and erosion control measures, to reduce the risk of flooding and water damage during severe storms.

### *Environmental Hazards (e.g., pollution, hazardous materials)*

- **Site Assessment and Remediation:** Conduct environmental site assessments to identify potential hazards, such as soil contamination or hazardous materials, and implement remediation measures to mitigate risks to residents' health and safety.

### *Infrastructure Failures (e.g., utility outages, aging infrastructure)*

- **Infrastructure Upgrades:** Invest in infrastructure upgrades, such as improving water and sewer systems, upgrading electrical systems, and maintaining roads and drainage infrastructure, to ensure the reliability and resilience of essential services.



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

- *Outline how you will enhance the safety and stability of manufactured housing given natural hazards, extreme weather, and disaster events in your project area. What steps will be taken to mitigate impacts to manufactured housing and/or MHCs from weather-related hazards such as, but not limited to, wildfires, tornados, extreme heat, and floods?*
- *Describe how your project supports LMI households that may be particularly vulnerable to impacts from weather-related hazards due to difficulties they may face preparing for, responding to, and recovering from disasters. If your project area includes homes that have been subject to repetitive loss, how will your project address and mitigate future losses?*
- *Describe how you will use and promote weather resistant and climate appropriate materials across all project sites in your proposal. For regional and national multisite proposals, describe how you will vary your approach to address differences in climate or climate change considerations among those sites as applicable.*
- *Describe how your project supports LMI households that may be particularly vulnerable to impacts from natural hazards due to difficulties they may face preparing for, responding to, and recovering from disasters. If your project area includes homes that have been subject to repetitive loss, how will your project address and mitigate future losses?*

### **Oregon Variable Climate and Associated Natural Disasters**

Oregon has nine distinct climate zones, all of which are vulnerable to natural hazards, extreme weather, and natural disasters. The variety of climate in Oregon is reflected by the variety in natural disaster risk. A manufactured home on the Oregon coast could be at risk of tsunami, earthquake, landslide, flooding, and wildfire, while a manufactured home just an hour away in Southern Oregon or the Willamette Valley could be at risk of wildfire, winter storms, and landslides. In Central and Eastern Oregon there is risk for wildfire, winter storms, windstorms, hail, dust storms, volcanic risk, and drought.

With such variation in weather across the state and the hazard it brings to homes, it can be difficult to prepare for, particularly for lower income households.

#### *Manufactured Home Repair and Rehabilitation Program (MHRRP)*

The repair and rehabilitation resources would be a first line of defense for owners of manufactured homes in preparing for extreme weather and natural disasters. A home evaluation completed by a trained, certified professional will determine the priority improvements needed for each home and tailor the grant awarded to the participant to address the specific needs to make their home weather ready.

## *Manufactured Dwelling Park Preservation (MDPP)*

Infrastructure improvements made possible with preservation resources make parks more resilient through sewer/wastewater system improvements, efforts to bring parks up to fire code, and other upgrades.

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

- *Describe in detail how your proposed activities will advance Environmental Justice in one or more of the activities below. You may wish to consult the [Climate and Economic Resilience Screening Tool](#) for examples of environmental justice factors and economic indicators, such as energy, health, legacy pollution, water/waste water, and projected risk of floods or wildfires. For this competition, activities that advance Environmental Justice for people or communities that have been environmentally underserved or overburdened (e.g., low-income, and Black and Brown communities) are listed below:*
  - ❖ *Reducing or mitigating exposure to environmental and health hazards (e.g., poor air quality, legacy pollution, heat islands, and soil contamination from current/former industrial areas).*
  - ❖ *Improving protection from and resilience to environmental harms (e.g., weatherization, tornado shelters, fire-resistant materials, floodproofing).*
  - ❖ *Expanding environmental benefits (e.g., clean air and water, public transportation, bike and walking paths, clean energy, green technology, biodiversity).*
  - ❖ *Overcoming prior disinvestment in environmental infrastructure (e.g., drainage systems, green spaces, pollution controls).*

### **Environmental Justice Considerations**

OHCS' proposed PRICE activities will advance Environmental Justice and expand environmental and health benefits across the following dimensions:

- *Reducing or Mitigating Exposure to Environmental and Health Hazards.*

OHCS will prioritize the reduction and mitigation of exposure to environmental and health hazards for environmentally underserved, overburdened communities, including low-income and Black and Brown communities. Activities will focus on utilizing weatherization resources, employing energy efficient homes, using fire-resistant building materials to improve indoor air quality, and sewer/water infrastructure improvements.

PRICE resources for repair and rehabilitation will update home heating systems, insulation, roofing, and plumbing, among other features of the home as recommended by a professional

home audit with modern, energy efficient, environmentally conscious home equipment and materials. Home repair and rehabilitation will improve indoor air quality by mitigating energy leaks, moisture, mold, and mildew. When home replacement is required, the new manufactured home purchased via MHRRP forgivable loans must be ENERGY STAR or NEEM 2.0 rated. The home heating equipment required for these energy ratings not only provides a cost savings for the homeowner, it also improves home indoor air quality. One of Oregon’s major and more affordable manufactured home builders uses low VOC materials in every home they build which greatly improves home indoor air quality.

- *Supporting Culturally Specific Housing Organizations*  
Advancing equity and racial justice is one of 6 priorities outlined in the agency’s Statewide Housing Plan. The agency’s approach works to ensure that organizations rooted in and serving BIPOC communities across the state have equitable access to OHCS resources to maintain the safety and viability of their portfolios. These communities know how to identify their specific needs to keep residents safe from environmental hazards as well as name the barriers – including financial – to address hazards is essential to that approach.

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

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

*For each community you propose to support, describe how you will include and use input from stakeholders impacted by your proposed activities, such as manufactured housing residents, local governments, nonprofits, CDFIs, cooperatives, tenant advocates, fair housing organizations, manufactured housing developers, builders/general contractors, and unions. Describe what efforts you will take to engage and support participation by underserved communities and groups least likely to participate in the community. If the barriers described in Factor (a) will prevent successful project implementation, what is your plan to engage the community, local or state agencies, elected officials, etc., to address those barriers?*

### **Community and Stakeholder Engagement Plan**

OHCS enjoys a robust and engaged network of legislative champions, manufactured housing developers, manufactured home builders, nonprofits, and experienced staff with deep experience in the manufactured housing space. This application is a reflection of the work in which the agency and external partners have already engaged and possesses a shared vision for addressing the state’s most critical manufactured housing needs.

There is significant statewide interest in the PRICE grant opportunity. In addition to the external collaboration included in the application, the agency’s Community Engagement Section of the

Public Affairs Division has crafted the following stakeholder engagement plan in collaboration with our Homeownership and Affordable Rental Housing Divisions.

### *Public Engagement Accomplishments*

- Add a link to all application materials on OHCS homepage and ensure ease of navigation to the OHCS PRICE Main Grant webpage.
- Host one virtual public hearing and one hybrid/in-person/virtual public hearing. OHCS will provide Spanish and ASL interpretation in the hearings.
  - 1) Public Hearing 1: Present full application materials to participants, walk through the feedback and input process, and answer initial questions interested parties have at the beginning of the public comment period.
  - 2) Public Hearing 2: Present a summary of input received by the public and how it will be integrated into the application. Take remaining public comments.
- Post recordings and presentation slides of both public hearings on the PRICE Main Grant webpage.
- Issue technical advisories with information on virtual and in-person public hearings through the agency's extensive email distribution lists.
- Disseminate a survey with questions covering the OHCS application materials.
- Offer public feedback opportunities via traditional mail, email, during public hearings, in community meetings, and online survey.
- Conduct a thorough analysis of all external stakeholder feedback and integrate input to the greatest extent possible that still guarantees compliance with PRICE Main rules, efficient delivery, and transparent access to funding statewide. Analysis will also be included in *Exhibit H Summary of Comments*.
- Remain responsive to external partner outreach throughout the public comment period scheduled for a total of 17 days: June 4<sup>th</sup> – June 20<sup>th</sup>.
- Provide application presentations at stakeholder meetings, culturally specific development partners, and regular meetings hosted by OHCS.
- Publish and maintain a frequently asked questions (FAQ) document on the PRICE Main Grant webpage in both English and Spanish.
- Share public hearing information with the Oregon State Legislature, home to many manufactured housing legislative champions who will participate in hearings and circulate information with their districts, community leaders, and constituents.
- Collaborate with the Communications Section to share information in OHCS newsletters and social media posts.

- Maintain grant application and program information on OHCS' [Manufactured & Marina Communities](#) webpage with resources, program information, and directories.
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- *How does your proposal align with existing community plans and policies?*

*Does your proposal align with applicable existing comprehensive plans, land use plans, housing plans, fair housing planning, or other plans or policies in the community or communities across the project area(s)? Alternatively, if your proposal includes changing community plans and policies to be more supportive of manufactured housing, describe those changes and how you will secure buy-in to those changes from local officials and from community members.*

### **Alignment with Existing Plans & Policies**

OHCS' manufactured housing programs and PRICE proposal are carefully aligned with existing community plans, the agency's Statewide Housing Plan, land use regulations, fair housing rules, and other initiatives.

- *HUD Comprehensive Plan*

OHCS programs complement these plans by providing resources and support for manufactured housing development and preservation, contributing to the overall housing goals of the community.

- *OHCS Preservation Strategy Framework*

The agency's framework articulates a clear rationale for sustained investment in preservation and forecasts the need over the next 10 years and beyond. It defines what preservation means for OHCS and establishes high-level goals, including commitment to equity and racial justice. It further clarifies how OHCS will approach prioritizing resources available for preservation and helps inform partners' planning around asset management.

- *Oregon Land Use Law*

OHCS proposals are consistent with local land use plans that designate areas for manufactured housing developments and establish zoning regulations governing their development. By adhering to land use regulations and guidelines, this proposal ensures that manufactured housing projects continue to be situated in appropriate locations and adhere to land use standards, contributing to the orderly and sustainable growth of communities.

- *Fair Housing Rules*

OHCS activities adhere to fair housing law and objectives outlined in local fair housing plans, which aim to promote housing equity, eliminate discrimination, and ensure access to housing opportunities for all residents.

- *Local Planning and Priorities*

Through the development of this application package, reinforced during the public comment process, we will ensure that the application proposal represents a wholistic statewide view of the need with the tools to address the needs of local communities.

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## Narrative Exhibit E – Capacity

*Factor (c): CAPACITY (Maximum 20 points)*

*HUD will carefully consider the technical and financial capacity of applicants to ensure PRICE grantees can carry out project proposals in an efficient and timely manner while responsibly expending federal funds. HUD will rank proposals that demonstrate the applicant’s capacity to carry out the proposal, as well as their recent experience carrying out similar work, more highly. Describe in your narrative:*

• *Who are your key staff?*

○ *All Applicants: List key staff from your organization (and your partner organizations, if applicable) who will be responsible for project leadership, management, and implementation, and the roles they will perform throughout the project(s) life cycle. 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. If applicable, list your for-profit partner(s) and their financial interest in your proposed project. This may include, but is not limited to, land ownership within the project area(s).*

### Key Staff & Program Management

In addition to a strong network of dedicated manufactured housing partners, OHCS is fortunate to have knowledgeable, seasoned, and passionate staff to administer its programs. The agency is currently determining the division of labor to support connecting communities with the highest needs with critical PRICE resources. OHCS does not anticipate need for additional staff to administer the full grant request amount within the program rules.

Having the below key staff positions filled demonstrates OHCS’ readiness to hit the ground running if awarded.

*Manufactured Home Repair and Rehabilitate Program | OHCS Homeownership Division,  
Manufactured Housing Section*

**Rick Abrego**

Assistant Director  
Manager, Manufactured & Marina  
Communities Resource Center

**Kari Hodai**

Program Manager

**Everett Horvath**

Program Navigator

**Shauna McDonough**

Program Analyst

**Emily Arnold**

Community Engagement Specialist  
Homeownership Division

*Manufactured Dwelling Park Preservation | OHCS Affordable Rental Housing Division*

**Kyle Pierce**  
Program Manager

**Kassie Clarke**  
Engagement Specialist  
Affordable Rental Housing Division

**Kate Hillig**  
Production Analyst, Park Preservation

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## Narrative Exhibit F – Leverage

*Factor (d) MATCH OR LEVERAGE (Maximum 5 points)*

*Applicants for PRICE Main awards may credit both financial contributions and the dollar amounts of any non-financial contributions towards the percentage of leveraged commitments.*

*Describe in your narrative the sources and amounts of match or leveraged funding, along with other resources or expertise those sources bring to the proposed project. These may include funding from state and local government sources, the non-profit sector, the private sector, among other potential sources. In addition to financial contributions, applicants for PRICE awards may credit the dollar amounts of any non-financial contributions towards their percentage of leveraged commitments.*

### **Leverage: The Oregon Affordable Housing Tax Credit (OAHTC)**

The Oregon Affordable Housing Tax Credit Program provides a state income tax credit for affordable housing loans for which a lender reduces the interest rate by up to four percent. Applicants must demonstrate a 20-year term during which the benefit of the reduced interest will be passed on to reduce rents for tenants.

OHCS plans to utilize a portion of the agency's biennial OAHTC allocation as leverage for park preservation. Staff are drafting a budget for the tax credit that includes the 20-year term.

## Narrative Exhibit G – Long-term Effect

*Factor (e) LONG-TERM EFFECT (Maximum 10 points)*

*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.*

*• 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?*

### **Long-term Retention of Affordable Housing Options in Oregon**

Designed to ensure the long-term affordability of housing without federal subsidy, the proposed combination of targeted interventions, affordability enforcement mechanisms, and cooperative ownership models via both the *Manufactured Home Repair and Rehabilitation Program* (MHRRP) and *Manufactured Dwelling Park Preservation* (MDPP), the agency and its partners will continue creating an enduring impact on housing stability, affordability, and community resilience for low- and moderate-income households in Oregon. The proven outcomes from these bold efforts demonstrate that the proposed activities already have.

By addressing critical maintenance needs, enhancing energy efficiency, and preserving manufactured communities through the pairing of state and local funds, the Oregon Affordable Housing Tax Credit leverage, and critical PRICE resources, these activities are poised to continue generating lasting benefit to Oregon families well beyond the grant's period of performance.

Through cooperative ownership models and nonprofit partnerships, we facilitate opportunities for residents to purchase and collectively manage their manufactured home parks. By empowering residents to become owners, we promote community stability, build wealth, and ensure long-term affordability for LMI households.

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

*Note: affordability requirements applicable to this NOFO can be found in Section VI.E of this NOFO.*

## **Affordability for the Long-term**

### *Manufactured Home Repair and Rehabilitation Program (MHRRP)*

Data indicate that over 60 percent of manufactured homes in the state are owned by LMI households, highlighting the importance of preserving these homes. Participants in the MHRRP are guaranteed ongoing affordability for homeowners with no interest, zero payment 15-year forgivable loans. Eligibility criteria are specific and require that households have a household income below 80 percent AMI, with 75 percent of program participants to date falling below 50 percent AMI. Long-term affordability measures begin when Recipients of the repair and rehabilitation assistance commit to remaining in the home as their primary residence for the duration of the 15-year forgivable loan term or sell their home to a program qualifying buyer.

### *Manufactured Dwelling Park Preservation (MDPP)*

Affordability agreements are also established for manufactured home parks receiving preservation funding through the MDPPF. These agreements ensure that lot rents and other fees remain affordable for residents, even as improvements are made to the park's infrastructure will support the preservation of manufactured home parks through infrastructure upgrades, rehabilitation projects, and tenant protections preventing displacement. By working with park owners and tenants to establish affordability agreements, we protect LMI households from being priced out of their communities.

By addressing critical infrastructure deficiencies and promoting long-term affordability, the program will enhance community stability and resilience in manufactured home communities across Oregon. Since 2011, OHCS has helped 33 manufactured home communities preserve their affordability, benefiting hundreds of LMI households.

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*• 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?*

## **Stable Homeownership**

The repair and rehabilitation program will revitalize owner-occupied manufactured homes with deferred maintenance, ensuring that these homes remain viable and safe for occupancy by LMI households. Data indicates that more than 30,000 manufactured homes in Oregon, excluding homes built prior to 1976 are in need of repair or rehabilitation, highlighting the critical need for the program in the state. Financing options for repair and rehabilitation projects empower manufactured homeowners to build equity in their homes and wealth over time. Research from the Urban Institute indicates that homeownership remains a key pathway to wealth accumulation for LMI households.

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• *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?*

## **Supporting Underserved Communities**

The proposed activities emphasize collaborative partnerships with community stakeholders, including local governments, nonprofits, and community action agencies, to leverage resources and maximize impact for underserved communities. The agency's Statewide Housing Plan identifies *Equity and Racial Justice* as one of its six key priorities, rooted in a commitment to advancing housing justice. Internal data indicate that manufactured home parks are more likely to be located in low-income and racially diverse neighborhoods, making them critical sources of affordable housing for communities of color. By building capacity within communities and fostering a culture of collaboration, these programs will continue laying the groundwork for sustained housing stability and affordability in Oregon.

### *Manufactured Home Repair and Rehabilitation Program (MHRRP)*

This program will prioritize underserved communities and vulnerable populations by ensuring equitable access to repair and rehabilitation assistance for owner-occupied manufactured homes. With program home improvements, we aim to address disparities in housing quality and promote equitable access to safe and healthy housing options. The MHRRP allows residents to repair their homes, which allows families to remain in their homes safely. Repairing manufactured home assists in protecting not just an asset, but a critical wealth-building opportunity.

### *Manufactured Dwelling Park Preservation (MDPP)*

Residents of manufactured home parks receiving preservation funding through the MDPPF to move to a cooperative management model receive financial counseling and transition assistance from trusted external partners facilitating the transaction. This helps them navigate affordability challenges and ensure that housing costs remain within their means over the long term. By partnering with stakeholder organizations, community leaders, and resident associations, we aim to build trust, foster collaboration, and empower these communities to advocate for their housing needs and priorities.

Through tailored, individual, and family-centered approaches, equitable policies, and community partnerships, we aim to address systemic disparities in housing quality, promote economic power, and create pathways to long-term stability and prosperity for vulnerable populations, particularly those of color, in manufactured housing communities across the state.

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• *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.*

## **Healthy, Sustainable and Resilient Communities**

### *Manufactured Home Repair and Rehabilitation Program (MHRRP)*

Through targeted repairs and rehabilitation efforts, the program addresses health and safety hazards in manufactured homes, such as mold, lead paint, and asbestos. It is irrefutable that substandard housing conditions have adverse effects on resident health, particularly for vulnerable populations. By improving indoor air quality and eliminating hazards, we reduce health risks and create healthier living environments for residents.

Repair and rehabilitation of older manufactured homes will extend their lifespan, allowing residents to remain in sustainable affordable long-term housing, rooting households within their communities supporting family stabilization. These efforts will increase the number of energy efficient homes while reducing utility costs residents.

### *Manufactured Dwelling Park Preservation (MDPP)*

Program supports initiatives to reduce environmental hazards in manufactured home parks, such as soil remediation, water quality improvements, and pollution controls. Data from the Oregon Environmental Council indicates that manufactured home parks are often located in areas with higher levels of environmental pollution, posing risks to resident health. By implementing mitigation measures and environmental protections, we create safer, more sustainable communities for residents to live and thrive.

The preservation of manufactured home parks through infrastructure upgrades, rehabilitation projects, and tenant protections have been instrumental in facilitating the formation of cooperatives to buy and operate parks collectively, preserving affordability and community stability.

These two programs are strategically designed to address the long-term housing needs of the most vulnerable households in Oregon. Through the use of these tools, interventions, partnerships with community stakeholders, and innovative financing mechanisms, we aim to ensure the sustainability, affordability, and resilience of manufactured housing communities for years to come.