

Oregon Housing and Community Services
Revised Draft HUD PRICE Main Application

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Narrative Exhibit A – Executive Summary

Oregon Housing and Community Services (OHCS) is committed to ensuring long-term housing affordability, stability, resiliency, and energy savings for LMI households residing in manufactured homes and communities.

Soundness of Approach: A Proven Strategy

The agency plans to achieve this by leveraging existing successful program frameworks, a statewide network of skilled and experienced partners, internal policy expertise, and state investment with this federal offering.

The application outlines modifications to two existing OHCS programs to align with U.S. Department of Housing and Urban Development (HUD) Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Main requirements:

1. *Manufactured Home Repair and Replacement Program (MHRRP)*
2. *Manufactured Dwelling Park Preservation (MDPP)*

Need: Oregon’s Affordable Housing Crisis

Oregon faces an extreme housing shortage. Recognizing the important role of manufactured homes in addressing this deficit, OHCS has implemented a suite of programs to bolster and protect this housing stock but need far outpaces available resources.

Currently, OHCS data indicate that 80 percent of Oregon’s manufactured housing inventory was built before 1995, and 40 percent was built before 1976. This means that much of the state’s manufactured housing stock is energy-inefficient, unsafe, and far past its intended life span.

Oregon Housing and Community Services (OHCS) requests \$25 million in PRICE Main grant resources for the eligible activities outlined in the application proposal.

Vision and Goals: Showcase Manufactured Housing as a Premier Affordable Option

OHCS is in enthusiastic agreement with HUD Deputy Administrator of Office of Manufactured Housing Programs Jason McJury in envisioning “manufactured housing to be the *preferred* affordable housing solution, *not* an option of last resort.”¹ Oregon is a national leader in manufactured housing development and preservation, supported by proactive policies, significant state and local investment, political advocacy, and collaborative partnerships.

“Housing cost has been one of the top things that everyone in the community is facing with everything going up. We’re so grateful for Oregon’s manufactured home grant programs that have helped us live in affordable housing and stepped in when our community most needed it.”

Cindy Cole | Cooperative President
Family Redwood Park – Grants Pass, Oregon

¹ HUD Manufactured Housing Webinar Series - Introduction to Manufactured Housing, November 1, 2023

Narrative Exhibit B – Threshold Requirements

Compliance with Threshold Requirements

Oregon Housing and Community Services complies with all threshold requirements outlined in Section III.D.

1. Resolution of Civil Rights Matters

OHCS has no outstanding civil rights matters as of the HUD PRICE application submission deadline of July 10, 2024, 11:59:59EST.

The agency’s commitment to and compliance with The Fair Housing Act aligns with this threshold requirement.

2. Timely Submission of Applications

OHCS has complied with the timely submission of application threshold and deadline of July 10, 2024, 11:59:59EST as outlined in Section IV.D. of the HUD PRICE NOFO.

3. Eligible Applicant – State of Oregon

OHCS is an eligible applicant as Oregon's state Housing Finance Agency as outlined in Oregon Revised Statute ORS 813.112, in accordance with Section III.A of the PRICE NOFO.

As the designated state agency responsible for publicly-funded housing finance and development in Oregon, OHCS has an extensive track record of effectively administering federal and state housing programs and initiatives, reporting, and compliance.

4. Number of Applications

One Application: PRICE Main Competition

OHCS has submitted one application for the PRICE Main competition.

5. Federal Assistance Representations and Certifications – Section IV.G.1

HOUSING & COMMUNITY SERVICES, OREGON DEPARTMENT OF		● Active Registration
Unique Entity ID	CAGE/NCAGE	Expiration Date
CJUQKQXSCJ5	36UE2	Feb 27, 2025
Physical Address		Mailing Address
725 Summer ST NE STE B Salem, Oregon 97301-1266, United States		725 Summer Street NE Suite B Salem, Oregon 97301-1271, United States



Narrative Exhibit C – Need

Factor (a): NEED (Maximum 15 points)

· Are you applying for PRICE Main, PRICE Replacement Pilot, or both?

HUD PRICE Main Competition

Oregon Housing and Community Services (OHCS) requests \$25 million in PRICE Main grant resources for the eligible activities outlined in the narrative prompts for its application.

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

Oregon’s Affordable Housing Crisis

The Oregon Housing Needs Analysis (2022)² – 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 with a growing 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 over the next 10 years. The Governor has stipulated that 18,000 of these must be rent-restricted, affordable units. This production target represents a bold increase of 80 percent overall housing construction from previous trends.

As Oregon continues grapple with this housing crisis through increased production, OHCS also works to preserve the state’s affordable – both subsidized and naturally occurring – prevent losing ground in retaining its affordable housing stock. Data gathered from program staff, external partners, and annual manufactured home park registrations indicate that there are more than 300,000 Oregonians residing housing in roughly 140,000 manufactured homes. Sixty percent of these residents earn at or below 50 percent AMI. The rapid decay of older manufactured homes, a majority of which were built prior to 1976, make them ineligible for certain resources like federal weatherization grants.

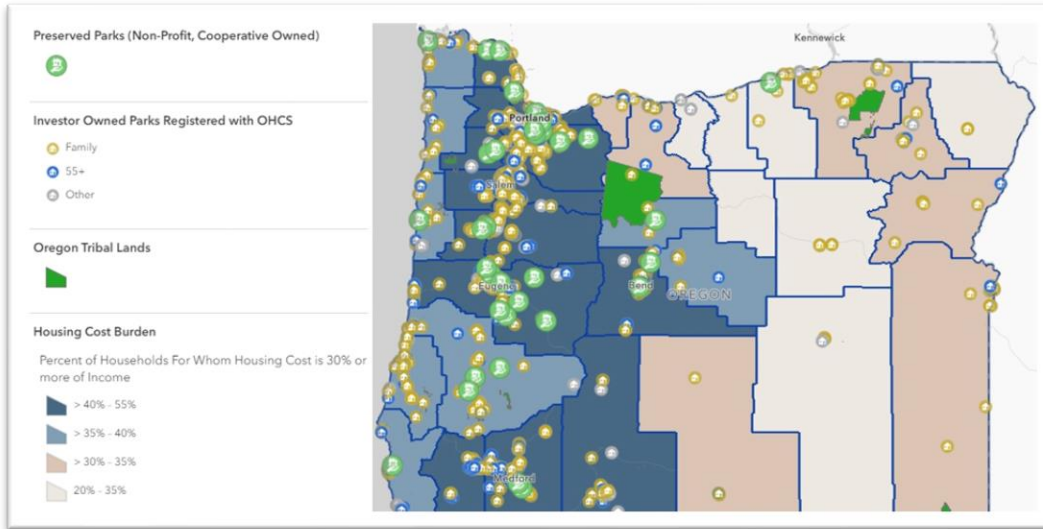
Deficiency of Affordable Housing Options

According to the National Low Income Housing Coalition, Oregon has a deficit of more than 100,000 affordable and available rental homes for low-income households, and that nearly half of all renters in the state are considered cost-burdened.³ Data collected by the OHCS Manufactured Home Park Registry⁴, facilitated by required, annual park owner registration cross references park location and housing cost burden across the state. The most cost-burdened counties are also those with most significant manufactured home park presence.

² oregon.gov/lcd/housing/pages/ohna

³ nlihc.org/housing-needs-by-state/oregon

⁴ Manufactured Home Park Directory, oregon.gov/ohcs/mmrc/Pages/park-directory



- ***Risk of Conversion of Oregon’s Manufactured Housing 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 of these homes located in a little more than 1,000 privately owned parks across the state.⁵

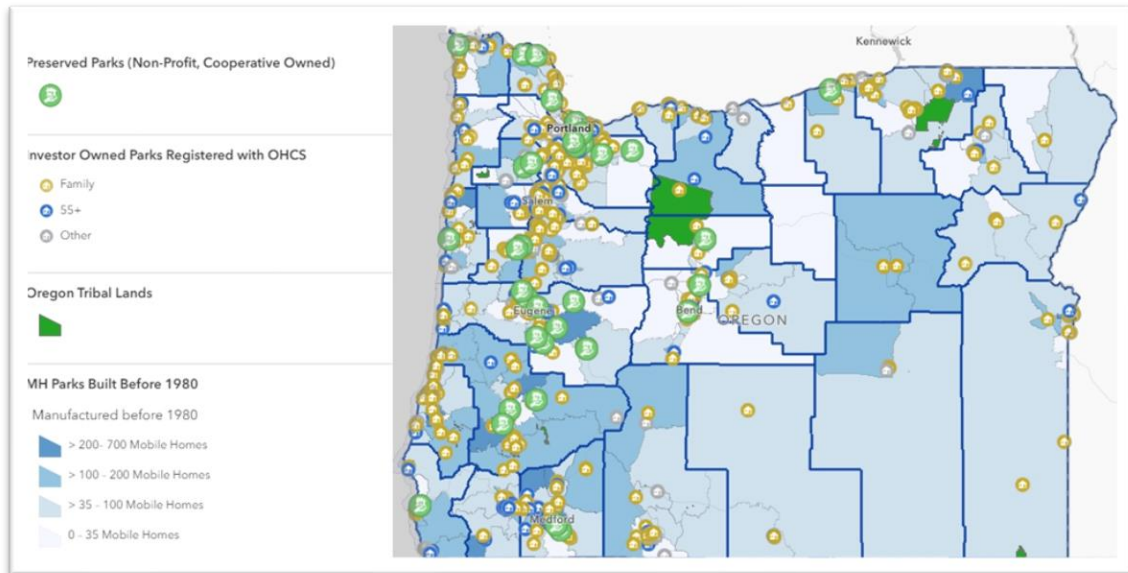
- ***Low- and Moderate-Income (LMI) Households in Need***

The U.S. Census Bureau reports that approximately 30 percent of Oregon households earn incomes below 80 percent of the AMI, highlighting the substantial need for affordable housing options across the state. Approximately 96,600 households living in manufactured homes earn at or below 50 percent AMI, and 69 percent of manufactured homeowners in Oregon earn at or below 50 percent AMI.

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

Program and park registry data indicate that 80 percent of the manufactured homes in Oregon, or 112,000, were built prior to 1995. Roughly 80,000 of those homes were built prior to 1980. Approximately 60,000 of these homeowners are low-income households earning or below 80 percent AMI. Staff have extrapolated this data to argue a pressing need for repair, lead abatement, mold removal, and energy efficiency upgrades for at least 100,000 of these homes. Even within the state’s preserved manufactured home parks, a majority of homes were built prior to 1995 when improvements in building safety and energy efficiency standards changed across the industry. For Oregon, this means that a large portion of the manufactured housing stock is far past its intended life span, energy-inefficient, and unsafe. By today's manufactured home standards, there is a significant need to replace most manufactured homes in Oregon.

⁵ Network for Oregon Affordable Housing, [testimony to the Oregon Legislature’s Housing Committee](#), 5/12/23



Statewide Manufactured Home Needs

The OHCS Manufactured Home Replacement Program fully expended its \$2.5 million allocation within the first six weeks of the 2023-2025 biennium. The program was able to assist 70 LMI owners since it began in 2020 and has received more than 75 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. The vast majority of Oregonians contacting OHCS for assistance are LMI homeowners seeking repair or replacement of their homes, having few to no other resources nor alternative housing options.

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 shows that the 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. Homes built prior to 1976 do not qualify for this program and owners of those units have even more limited access to resources for repair/weatherization; staff report several hundred outstanding ineligible requests for assistance.

CASA of Oregon, a leader in cooperative park ownership transitions, has identified approximately 8 parks that currently meet eligibility criteria for preservation: totaling roughly \$30 million in needs with only \$10 million available for the program in the 2023-25 biennium. OHCS currently has 7 park projects active in its current preservation project pipeline. While the agency cannot preserve every park in Oregon, the \$12.5 million dedicated for preservation would be lifechanging for hundreds of Oregon families.

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

Distress Criteria

Seventy percent of counties in Oregon meet the Distress Criteria.⁶ A significant percentage of manufactured homes are located within these counties. According to Community Action Agency (CAA) partners, who regularly work on weatherization repairs on homes in the communities they serve, a large majority of manufactured homes in these counties require repair or replacement for residents to remain housed safely.

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

Disaster Resiliency

There are a handful of communities in Oregon designated as a Community Disaster Resilience Zone, as defined by FEMA, mainly in small areas of the north and south coast, pieces of the Portland metro area bordering Washington State, and an area of the City of Salem.

According to CASA of Oregon, 1,500 manufactured homes were destroyed, 18 manufactured home communities were either destroyed or severely damaged, and approximately 6,000 manufactured housing residents were displaced. In response to tragic fire seasons, many manufactured home producers in Oregon now offer homes that are built to Exterior Fire Resistive Construction System Certification. With a modest price 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 now requiring 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 reduce damage during a seismic or weather event.

⁶ oregon.gov/biz/reports/pages/distressedareas

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

Barriers to Manufactured Housing Preservation in Oregon

Complex and interconnected, encompassing infrastructure deficiencies, financing limitations, high land values, these barriers hinder the accessibility and affordability of manufactured housing options. Oregon has notable diversity in geographic features including metropolitan population centers areas in the west and very rural communities in central and eastern parts of the state. Because of this variation, the barriers to preservation and revitalization have differed between regions. Some of the more common barriers identified across Oregon include:

- Timing property needs with limited and uncertain resource availability
- High land values fostering extreme competition raising prices
- Financial product access limitations for manufactured homeowners

Through collaboration with Oregon’s engaged, experienced, and committed landscape of partners, work to address these barriers is well underway. The main barrier, however, 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 command high prices on the open market making a timely and nimble response from public funders essential to successfully competing with for-profit buyers for acquisition of parks. While bridge financing from nonprofit lenders has helped partners acquire projects, there is still a great need for resources to replace the three-year bridge loans with long term financing.

High Land Values and Costs

The state has experienced rapid increases in land values in recent years, particularly in urban areas. Older manufactured home parks are generally on larger parcels of land, making the cost to purchase them prohibitive when on the open market and competing with private developers who are looking to redevelop larger parcels for other uses.

Financial Product Access Limitations

Limited financing options for purchasing manufactured homes, lots, and cooperative ownerships present barriers to homeownership for low- and moderate-income households. With the rising costs of homeownership across the country, Oregon is no exception. Manufactured homes are often a principal vehicle for LMI families to see homeownership within reach, but encounter financing barriers with limitations in mortgage options for these homes. It can also be difficult for LMI families to qualify for mortgages with terms that are affordable, as incomes have not kept pace with inflation, interest rates remain high, and often mortgages for manufactured homes have less favorable terms than other mortgages.

Narrative Exhibit D – Soundness of Approach

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

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

· What are your vision and goals?

Vision: Showcase Manufactured Housing as a Premier Affordable Solution for Oregon

Oregon is a national leader in innovative manufactured housing, and Oregon Housing and Community Services (OHCS) offers a suite of programs, at varying levels of resource, 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, invested stakeholders.

In tandem with HUD, OHCS seeks to rewrite the current narrative around manufactured housing, combining this federal investment, available state resources, experienced external partners, and agency staff expertise to illustrate its potential as a game-changing component of Oregon's affordable housing strategy. The agency eagerly anticipates the transformative potential of PRICE Main resources and the attention that federal investment brings to this specific housing type with hopes that state further embrace the many advantages and challenge common misperceptions of manufactured housing.

The preservation, repair, and replacement of manufactured homes and communities are empirically proven homelessness prevention measures, addressing the pressing need to maintain affordable, stable, healthy housing options. Many Oregonians currently reside in substandard housing due to rising rents and lack of available alternatives, highlighting the urgency of further investment in its manufactured housing stock, supported by PRICE, and the leveraging of the Oregon Affordable Housing Tax Credit (OAHTC).

With an investment through PRICE Main, the agency envisions a model that not only makes an affordability case for manufactured housing, but also demonstrates the efficacy and beauty of modern advancements in manufactured housing technology. OHCS asserts that manufactured housing offers an elegant solution that is both cost-effective and can be produced quickly for LMI households who are not served by the housing market.

This investment has the potential to catalyze support for expanding the manufactured housing footprint across Oregon. The state is fortunate to have several, bipartisan manufactured housing champions in the Legislature, and OHCS aims to further bridge the gap between skeptics and proponents of manufactured housing through visible, impactful activities enabled by PRICE.

The vehicle to pursue this vision is existing, successful program infrastructure for the administration of PRICE Main grant resources. With modifications to conform to HUD PRICE requirements and to continue equitable, transparent statewide access funds, both the

Manufactured Home Repair and Replacement Program (MHRRP) and Manufactured Dwelling Park Preservation (MDPP), are poised to achieve several key shared goals of the agency and the HUD PRICE NOFO.

Goals for Proposed Activities: Maintain Ground, Ready for Expansion

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

- *Wealth-building and Protection for LMI Households:* Park preservation ensures that current homeowners are not priced out of their communities by facilitating the acquisition of investor-owned parks by resident cooperatives or a nonprofit entity. Repair and rehabilitation efforts will help homeowners protect the value, health, and safety of their home allowing them to remain in homes that are safe and healthy for longer.
- *Strengthen Environmental Justice:* Repair and replacement resources allow the agency to assist more homes by removing toxic materials from older, deteriorating manufactured homes as well as assist with energy upgrades that will lower utility bills and carbon emissions. Repairing, rehabilitating, and replacing substandard manufactured housing will provide residents with safer homes and reduce health risks associated with asbestos, black mold, and lead. Park preservation will address deferred infrastructure maintenance issues and remediate environmental hazards present within park grounds that are equally impactful to resident health and often have life-threatening impacts on tenants.
- *Promote and Maintain 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 Stability and Prevent Homelessness in Urban Areas, Rural Regions, and Tribal lands:* Proposed activities prioritize statewide access and equitable distribution of resources. By leading the state's efforts with PRICE resources to repair, replace and preserve homes in Oregon, we will work to ensure distribution of resources throughout the state. The 17 Community Action Agencies (CAA) referring homeowners to OHCS for repair and rehabilitation resources serve all 36 counties across Oregon.
- *Preserve and Revitalize Existing Manufactured Homes and 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. Estimates in Oregon indicate that roughly 80 percent of all manufactured homes in the state were built before 1995. Approximately 60 percent of the pre-1980 manufactured homes in Oregon are owned and occupied by families with household incomes below 80 percent AMI. The proposed activities focus on both individual

homes and park communities and represent the agency's statewide view of the most pressing needs and opportunities for most sustainable impact.

- *Add Energy Efficiency and Resilience:* By repairing and rehabilitating aging, manufactured homes with deferred maintenance, replacing pre-1976 manufactured homes with energy-efficient ones, 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 homes to current health and safety standards. When possible, the agency will braid other resources to maximize resiliency investments, like the agency's Weatherization funds from the U.S. Department of Energy.
- *Create More Resident and Nonprofit Ownership Models:* Preservation resource programming supports resident owned cooperatives to empower residents to gain a voice in how their community is managed, build community wealth, and preserve affordability for future generations.
- *Catalyze a Shift in Prioritization and Will:* The PRICE grant is a pivotal opportunity to revolutionize perceptions and drive demand for manufactured housing solutions across Oregon. With these funds and the leveraging of agency resources, OHCS aims to build a compelling case with the modern advancements in manufactured homes—such as energy efficiency, durability, and aesthetic appeal—that rival traditional housing options and demonstrate how manufactured housing can address housing stability, economic resilience, and community vibrancy.

Working actively to remove stigma and inspire additional state investment in manufactured housing, the agency will help diversify Oregon's housing options to better meet the needs of all residents. Securing \$25 million through the PRICE Main grant will serve as a motivating proof of concept to Oregon's lawmakers, showing the tangible benefits and scalability of manufactured housing initiatives, paving the way for sustained state support and future investments in manufactured housing as a fundamental pillar of Oregon's housing strategy.

National Objective – Activities Primarily Benefit LMI Oregonians

The program modifications outlined above will serve to benefit LMI Oregonians. Forgivable loans offered through the *Manufactured Home Repair and Replacement 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 are 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 loan and revitalization resources. With PRICE resources, 100 percent of residents must earn 120 percent AMI and below. The accompanying affordability restrictions for those earning 80 percent AMI and below remain in place for a minimum of 60 years.

Current OHCS Manufactured Home Replacement Program Selection Criteria and Proposed PRICE Main Repair and Replacement Program Modifications

- Applicants must own the current manufactured home as their primary residence to qualify for replacement. OHCS does not replace second homes, rental properties, or vacation homes.
 - PRICE modification: this eligibility criterion aligns with PRICE requirements and will not be changed.
- Applicant’s current manufactured home must be energy inefficient and/or built before 1995 to be eligible for replacement.
 - PRICE modification: homes built prior to 1976 will be replaced. All manufactured homes built after 1976 will be eligible for PRICE repairs.
- Applicant’s manufactured home must be located 1) on their property, 2) in a cooperative or nonprofit owned park, or 3) in a privately owned park that has a written affordability agreement with OHCS.
 - PRICE modification: eligibility criteria will be based on PRICE requirements for the new repair and rehabilitation program components.
- Applicant’s household income must be at or below 100 percent of Oregon's AMI: \$99,200 for a family of four in 2024.
 - PRICE modification: Applicant’s household income must be at or below 80 percent of Oregon's AMI. Participants must commit in writing that should they sell their home before the end of the 15-year, no interest, zero payment, 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

Current OHCS Manufactured Dwelling Park Preservation Selection Criteria and Proposed PRICE Main Preservation Program Modifications

- Eligible park acquisition entities: Tenant Committee, manufactured dwelling park nonprofit/cooperative, housing authority, local government, or other qualified nonprofit.
 - ✓ PRICE modification: OHCS plans to maintain this eligibility criterion and reserve resources for mission-driven organizations that prioritize resident needs.
- Sixty percent of residents within an applicant park must meet income eligibility criteria, earning at or below 80 percent AMI, with no income restriction on the remaining 40 percent.
 - ✓ PRICE modification: OHCS will cap income eligibility for the remaining 40 percent of park residents at 120 percent AMI for parks preserved with PRICE resources. This means 100 percent of park residents, homeowners and tenants, must earn 120 percent AMI or below, with a minimum of 60 percent of residents earning 80 percent AMI or below.

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

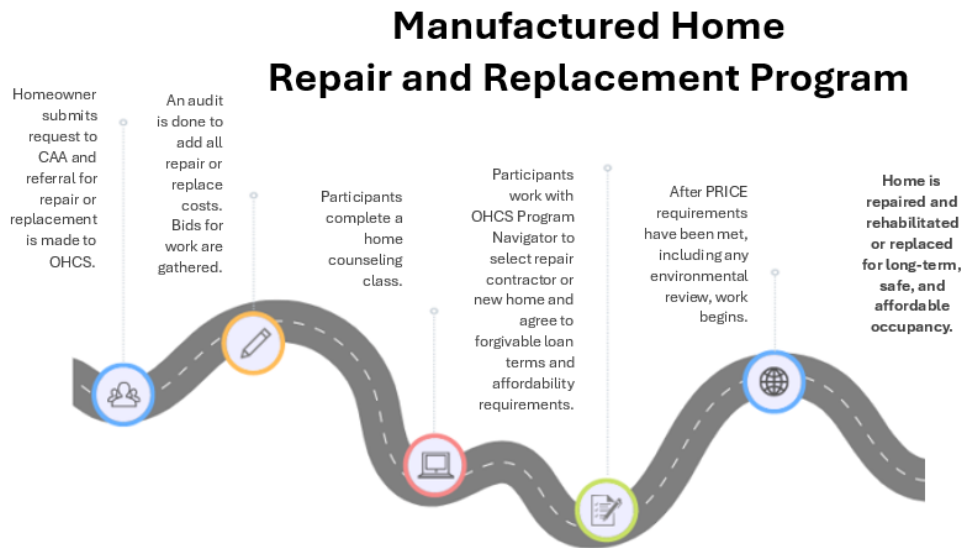
Activities to Address Oregon’s Manufactured Housing Needs: A Dual Approach

These eligible activities are designed to directly respond to the urgent need for stable housing options, particularly for vulnerable populations at risk of displacement. The proposal integrates solid resident protections, health and safety upgrades, and sustainable improvements to ensure that residents not only retain their homes but also thrive in secure and affordable housing environments for years to come.

I. PRICE Manufactured Home Repair and Replacement Program (MHRRP)

The OHCS PRICE *Repair and Replacement Program* has been designed to repair and rehabilitate owner-occupied manufactured homes with deferred maintenance that create energy efficiency, health, and safety challenges for low-income households. The MHRRP will be a dynamic, flexible program working to restore homes for stable occupancy, maintain long-term affordability, and retain the value of the asset. Leveraging existing systems and staff experience resulting from the agency’s successful *Manufactured Home Replacement Program*, OHCS is poised to efficiently deploy PRICE resources by expanding the program’s scope to include the repair and rehabilitation needs of manufactured homes in Oregon.

Program Framework Overview



Key Program Elements

- *Experienced Staff and Established Program Structure.*

The *PRICE Manufactured Home Repair and Replacement Program (MHRRP)* will expand on the work of the agency’s original replacement program by leveraging existing staff, partner networks, and program structures. The MHRRP will differ from the existing program in that it

will offer and prioritize repair of manufactured homes built after 1976. The existing replacement program only offers loans and grants for the replacement of homes built prior to 1995. The addition of critical PRICE resources will provide homeowners with the opportunity to make health, safety, and accessibility repairs and upgrades that allow residents to remain in their current home more safely and for longer.

The loan amount needed for a home replacement project is determined through a process that includes evaluation of the total project estimate, homeowner income verification, and an assessment of other resources that may be available to the homeowner (e.g., grants, savings, or bank loans) that are combined with the home replacement loan to cover the total project cost.

- *Manufactured Home Replacement Program Navigator.*

In OHCS' previous home replacement program, participants were referred for forgivable loans and paired with the OHCS Manufactured Home Program Navigator to receive guidance through the application and replacement processes. The Program Navigator assessed all resources available to homeowner to pair with the 15-year forgivable, no interest, zero payment loan.

Home replacement project costs vary depending on the location of the home, local code requirements, permit fees, and site construction costs, among other factors. The Program Navigator worked with the homeowner to gather bids from contractors in their area and to build an estimate for their home replacement project.

- *Established Partnerships.*

The *PRICE Manufactured Housing Repair and Replacement Program* plans to partner with Oregon's network of 17 CAAs serving communities statewide with energy efficiency incentives and weatherization programs. These community partners are experienced in auditing the repair needs of manufactured homes for weatherization program funding administered by the OHCS Energy Services Section. The CAAs' experienced weatherization and home energy auditors are well positioned to expand their home inspections to include *Manufactured Housing Repair and Replacement Program* applicants.

- *Income Eligibility.*

The *PRICE Manufactured Housing Repair and Replacement Program (MHRRP)* will set household income eligibility at or below 80 percent AMI. In OHCS' existing Replacement Program, 75 percent of participants served have been households at or below 50 percent AMI.


II. PRICE Manufactured Dwelling Park Preservation (MDPP)


OHCS' park preservation efforts foster the acquisition of existing manufactured home parks for nonprofit or resident ownership, physical infrastructure upgrades, and implementation of affordability agreements through deed restrictions.


Oregon has been a national pioneer in this creative long-term preservation strategy that supports residents who form a cooperative to buy and operate their park together. When a cooperative forms and acquires the park, funds to address basic deferred maintenance issues is bundled into the deal. Residents of a park owned by a nonprofit or a cooperative benefit from long-term predictability about the future of the park, the cost of their housing, and gain a voice in how their community is managed. Since 2011, OHCS has used available resources to aid 33 manufactured home communities preserve affordability.


Program Framework Overview


**Manufactured Dwelling
Park Preservation**


- 

Braids private lending products, financing from nonprofit partners, and OHCS park preservation grant funds.
- 

Provides essential access to capital and grant funding that residents and nonprofit entities are otherwise unable to raise at the scale and speed necessary for acquisition. Offers access to the Oregon Affordable Housing Tax Credit, reducing interest rates on permanent financing and generating equity for buyers.
- 

Ensures affordability for the most vulnerable by requiring 100 percent of residents earn at or below 120 percent AMI to receive OHCS grant funding. At minimum, 60 percent of park residents must earn 80 percent or below. Previous parks projects have almost exclusively served 100 percent of residents earning 80 percent AMI and below.
- 

Address critical park infrastructure deficiencies, like water and sewer system projects, road improvements, resiliency measures like backup generators, and utility service enhancements for long-term park viability.
- 

Prevent displacement within communities by ensuring long-term affordability for residents through income restrictions.
- 

Give residents a voice in the management of their communities and confidence in their housing stability.

Park communities that are ready to organize as a cooperative or a nonprofit entity seeking financing to purchase a park often work with an Oregon-based CDFI, like the Network for Oregon Affordable Housing (NOAH) and Craft3, that offers agile bridge loan products. Communities will then seek resources for preservation from OHCS to replace the bridge loan with permanent financing. The program allows for a preservation grant that pays up to 60 percent of the combined cost of purchasing the park and critical infrastructure repairs and is a major source of financial backing for cooperative and nonprofit park ownership.

Park acquisitions are often paired with the Oregon Affordable Housing Tax Credit (OAHTC), offering eligible entities access to higher, cheaper capital and the resulting built-in equity.

Key Program Elements

- *Experienced Staff and Established Program Structure.*

The agency has funded and facilitated 33 park preservation projects since beginning these efforts. External partners work well together when braiding permanent financing, bridge loans, grant funds, and other resources available to eligible purchasing entities.

- *Deed Restriction.*

Current affordability terms are enforced through deed restrictions that require, at purchase, at least 60 percent of the park spaces be rented to residents earning 80 percent AMI or less for at least 60 years. Ongoing project monitoring will be enforced over the lifetime of the restriction to ensure compliance, meaning long after PRICE Main resources are spent, the impact lasts.

Addressing Oregon’s Affordable Housing Needs

Both programs in the agency’s proposal continue to be in high demand. The number of applications received for the *Manufactured Home Replacement Program* quickly oversubscribed the \$2.5 million in resources allocated to the program in 2023, with an additional 75 replacement applications pending when the funds were fully exhausted. The Weatherization program administered by OHCS’ Energy Services Section reports a significant number of repair requests currently reaching near 700.

OHCS' PRICE proposal addresses multifaceted challenges in the manufactured housing sector by focusing on preservation, resilience, affordability, and community stability. Through strategic investments and modifications to current programs, OHCS will use PRICE resources to safeguard and enhance affordable housing options for LMI households statewide.

The agency will take every opportunity to utilize funding from other programs that it and its partners administer, such as HCV and other HUD affordable housing programs, in alignment with PRICE grant requirements. Homeowners benefiting from these programs who are eligible to rent their units must accept housing vouchers and adhere to all Fair Housing laws.

Maintaining Affordable Housing Options. By focusing on preserving and enhancing existing manufactured housing communities, implementing affordability restrictions, investing in infrastructure improvements, hazard mitigation, and energy efficiency upgrades, OHCS ensures that affordable housing remains available and accessible to LMI households across Oregon for the long-term.

Preventing of Conversion of Oregon’s Manufactured Housing Communities. OHCS mitigates this risk by providing direct gap funding and financial support through *Manufactured Dwelling Park Preservation (MDPP)* activities to facilitate the transition to nonprofit, cooperative, and local government ownership. Oregon law states that residents must be given the opportunity to make a purchase offer before other offers may be considered. The agency makes the most of this statute with its current preservation work and will continue with PRICE resources which have the potential to fund 3 or 4 park projects, representing hundreds of Oregon families.

Low- and Moderate-Income Households in Need: Financial assistance for home repairs, replacements, and park infrastructure improvements are offered only to LMI households. The *PRICE Manufactured Home Repair and Replacement Program (MHRRP)* program will work with LMI manufactured homeowners to protect their units as homes and as wealth-building assets and helps residents maintain safe and affordable housing amidst financial constraints and economic challenges, reducing displacement risks and enhancing community stability.

Hazards, Health, and Safety Issues in Substandard Housing Impacting Availability:

Substandard and outdated manufactured homes pose health and safety risks to residents. If critical repairs or a replacement is not made, homeowners are often forced to abandon their homes and the equity they have built. Through repair and replacement grants, OHCS supports efforts to upgrade this housing stock, maintaining the availability of the unit for affordable, safe, and stable habitation.

Substandard and Dated Manufactured Housing: The PRICE repair and replacement program will target substandard and dated manufactured housing units for repairs or replacement. The program supports homeowners in improving the quality and longevity of their homes, thereby preserving affordable housing stock and enhancing overall housing quality statewide. Aging infrastructure in manufactured home parks is addressed through park preservation, funds critical upgrades such as sewer systems, fire safety improvements, and energy efficiency measures. By modernizing infrastructure, OHCS improves living conditions and sustainability of MHCs, ensuring long-term viability for residents.

Timing and Sufficient Resources: OHCS ensures timely deployment of resources through its structured funding allocations for both programs carrying out PRICE activities. Leaning on program structures already in place allows agency to award resources more quickly. By leveraging state and federal funding sources, OHCS maximizes financial resources to meet the diverse needs of manufactured housing communities across Oregon.

Bulwark Against High Land Values/Cost: The affordability of land for manufactured housing is a critical concern, as rising land values have often led to rapidly increasing lot rents. Even Oregon’s statewide rent cap of 10 percent can be insufficient to protect lower income Oregonians. OHCS addresses this challenge by focusing on preserving existing communities rather than acquiring new land for development. Enhancing infrastructure, affordability requirements, and community resilience, *PRICE Manufactured Dwelling Park Preservation (MDPP)* will help mitigate the impact cost pressures on affordable housing options.

Financial Product Access Limitations: Access to adequate financial products through partnerships with lenders and community organizations is facilitated by OHCS park preservation resources. Preservation grants are offered to cover a maximum of 60 percent of acquisition and infrastructure improvement costs.

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

Timeline and Key Tasks for Proposed Activities

Staff have begun the work to craft implementation plans for both programs. In addition to several Oregon state agency processes, a thorough program review is required so new Oregon Administrative Rules can be created to align with PRICE requirements. The following key tasks are anticipated to be completed within 6 – 8 months from notice of award, identified, in order:

- **Notify** the Oregon Housing Stability Council of announcement of award. The Council, with the advice of the Executive Director of OHCS, meets in a monthly public hearing to direct policy and provide input on certain loans and grants. The Council was notified at June 2024 meeting of the agency’s intention to apply for PRICE Main and to promote the agency application’s public comment period June 4th – June 20th.
- **Draft** the agency’s PRICE Action Plan that will include firm budget numbers, a full implementation plan, and federal cross-cutting measures. Staff will begin this process upon notice of award and expect it to develop concurrently with other key tasks.
- **Update or create new** Oregon Administrative Rules (OAR) to ensure public transparency associated with necessary modifications to the two identified programs. Distribution mechanisms and reporting procedures for these programs will need to be in place to ensure compliance with PRICE requirements.
- **Receive** expenditure authority from the Oregon Legislature to access PRICE grant award funds. This is tentatively planned for the 2025 Legislative Session (February – June) during a hearing of the Joint Ways and Means Committee.
- **Potential procurement** of external environmental review consultant to fill any internal capacity gaps in order to comply with all NEPA requirements for PRICE grant activities. Project staff will coordinate with colleagues in other divisions undertaking similar work in line with other grants to draw upon experience.
- **Enter** into formal agreements with external partners for administration of PRICE Main resources. These processes begin after formal commitment of funds.
- **Receive** Oregon Department of Justice (DOJ) review and approval for any OAR changes and all loan agreements that will be used for PRICE programs. To expedite the DOJ review process, the agency will use current templates and make PRICE-compliant adjustments.
- **Launch** the PRICE Manufactured Home Repair and Replacement and Manufactured Dwelling Park Preservation programs. Promote programs to manufactured housing residents through legislative and nonprofit partners, manufactured housing policy networks, agency distribution lists, social media and traditional media channels.

Timeline, Key Dates, and Associated Tasks

October 2024: Tentative HUD PRICE Awards Announcement

November 2024 – February 2025: PRICE Main Grant Implementation Planning

Action Plan Drafting and Oregon State Agency Processes

- Report award to the Oregon Housing Stability Council at following monthly meeting.
- Draft PRICE Action Plan.
- Draft revised Oregon Administrative Rules (OARs) related to program modifications required to comply with all PRICE grant requirements.
- Consult with DOJ and finalize approval process for legal sufficiency reviews.
- Begin program manual drafting process with program staff.
- *2025 Legislative Session:* Report PRICE Main award to the Oregon Legislature at a public hearing of the Joint Committee on Ways and Means.

Manufactured Home Repair and Replacement Program (MHRRP)

- Program staff will coordinate with OHCS’ Energy Services Section to contract with nonprofit partners for manufactured home repair assessment.
- Meet with partners to establish formal agreements, determine funding allocations, scope of work, and next steps. Revise documentation, invoicing, and reporting processes.
- Start initial procurement planning process for environmental reviews and integrate this step into processes with partners, when necessary.

Manufactured Dwelling Park Preservation (MDPP)

- Revise park preservation grant application materials to include PRICE requirements.
- Draft new program manual that outlines all requirements, including federal PRICE rules.
- Work with external partners to ensure clarity early.
- Plan for completion of environmental review requirements.

Summer 2025: Target Launch for PRICE Repair, Replacement, and Preservation Programs

Projected Program Period Milestones: Home Repair and Replacement Program (MHRRP)

These annual program targets are estimated based on a budget of \$12.5 million, trends in previous years in the number of applications received for the Manufactured Home Replacement Program, and an average cost to repair of \$20,000/average cost of replacement \$140,000.

Program Year	Applications	MH Repair Projects	MH Replacements
Year 1: 2025	250 – 300	41	5
Year 2: 2026	350 – 400	79	6
Year 3: 2027	450 – 500	79	7
Year 4: 2028	350 – 400	79	7
Year 5: 2029	450 – 500	41	5
Year 6: 2030	<i>Projected Program Closure and Full Expenditure of Funds</i>		

Projected Program Period Milestones: Manufactured Dwelling Park Preservation (MDPP)

These annual program targets are estimated based on a budget of \$12.5 million, the 7 park preservation applications in the current pipeline, and an assumption of 4 total park projects.

Program Year	Park Grants Awarded	NEPA Reviews	Park Infrastructure Projects Begin
Year 1: 2025			
Year 2: 2026	2	2	
Year 3: 2027	2	2	2
Year 4: 2028			1
Year 5: 2029			1
Year 6: 2030	<i>Projected Program Closure and Full Expenditure of Funds</i>		



· *What is your budget?*

Budget, Sources of Funding, and Total Resources

OHCS is proposing a comprehensive budget of \$25 million on PRICE Main resources and \$20 million in equity generating Oregon Affordable Housing Tax Credits (OAHTC). This budget breakdown reflects OHCS' strategic approach to leveraging multiple funding sources on park preservation, home repairs, and environmental review and compliance.

- The \$20 million OAHTC allocation designated for preserving manufactured dwelling parks is supported and renewed biennially by the Oregon Legislature. The agency will make this level of resource available over the course of the six-year program period, allocating in careful coordination with housing development projects and other preservation work.
- OHCS plans to utilize the full allowable administrative maximum of 10 percent of total grant resources, \$2.5 million, for all administrative costs associated with managing this initiative ensuring efficient distribution, oversight, and compliance with grant requirements.
- Repair and rehabilitation grants have been budgeted at \$6,375,000, projected to deliver more than 300 individual completed home repair and rehabilitation grant projects.
- OHCS will dedicate \$4,250,000 for replacement forgivable loans, that will replace at least 30 unsafe, energy-inefficient units with new healthy homes.
- With \$11 million targeted for park preservation projects, staff believe this will result in 3 – 4 preserved park communities.
- \$275,000 will be designated for environmental review compliance and any third-party contacting needs, and an additional \$150,000 for any environmental mitigation needs.

Although some of the work of OHCS' proposed activities can be absorbed by current staff and resources, the personnel costs in Detailed Budget Worksheet (HUD-424-CBW) reflect the administrative hours the agency believes will be incurred.

Other resources are softly committed from other OHCS resources to further support these activities over the six-year program period. As an effort to manage risks of potential funding gaps, additional staff and administration needs, and other eligible costs, the agency plans to supplement with a combination of the Oregon General Housing Account Program (GHAP), state preservation funds allocated by the Oregon Legislature, and others as available and eligible.

NOTE: OHCS will not include these resources in the Detailed Budget Worksheet (HUD-424BW) because although the agency does have additional resources to pair with PRICE Main funds, the timing of future availability is undetermined.

Funding Distribution

Repair Grants. CAAs will coordinate with OHCS to facilitate funding distribution. Homeowners will not be required to manage grant funding.

Replacement Forgivable Loans. OHCS will make payments directly to manufactured home producers after the homeowners selects their new home. The Manufactured Housing Program Navigator will work homeowners to develop a budget and to select their replacement.

Preservation Resources. The agency will make preservation grant payments, up to 60 percent of total acquisition and repair costs, directly to the new ownership entity. OHCS staff will coordinate with the new ownership entity's lender to facilitate Oregon Affordable Tax Credit allocations.

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

Projected Impact of PRICE Repair, Rehabilitation, and Preservation Activities

As outlined in the *Proposed Activity Goals* section above, both proposed programs outlined below will be administered in alignment with PRICE requirements and have been built with the retention of this unsubsidized affordable housing stock as their focus. OHCS believes these interventions are critical to maintaining current affordable housing inventory as the entire state tries to build its way out of a tremendous affordable housing deficit. If Oregon is unable to retain these homes, many of these families will face very difficult choices with little to no available affordable housing options. Retaining these homes will keep communities and families together.

In 2022, OHCS administered a \$6.8 million program to replace 70 homes for 70 families across Oregon. Thirty-four of those were replacements 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 400 low-income Oregon families could be served for repair and rehabilitation of their homes.

With PRICE resources designated for park preservation, OHCS estimates that its grant request could serve approximately 3 – 4 parks equating to roughly 200 – 300 households per external partners estimates and recent summary of funding needs. On average, park preservation has averaged near \$55,000 per space. The PRICE funding would offer increased availability of preservation funds to ensure that Oregon families living in manufactured parks can stay in their housing long-term. This would enable seniors to age in place and other LMI households to have a sustainable and affordable place to live.

The preservation of parks buys long-term affordability for residents through access to non-subsidized affordable housing options. Deed restrictions ensure that homeowners and tenants alike will rent spaces and lots withing these that remain affordable at 80 percent AMI for a minimum of 60 years. It enhances the resilience of parks through infrastructure repairs that bring parks to modern standards through water and sewer improvements as well as road paving, among other things. It ensures long term affordability to decrease displacement due to unaffordable housing costs, which in turn provides stable housing for families. The long-term affordability through preservation also provides access to affordable housing for future residents when homeowners decide to sell their home or pass their home on to a family member.

Subfactor (b)(ii): Affordability and Equity (15 points)

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

Ensuring Affordability and Equity

OHCS has a long history of utilizing public resources to create and sustain affordability for low-income residents and remains a cornerstone of OHCS' mission. The agency accomplishes this through formal binding agreements with recipients of public funds, leveraging federal, state, and local resources to provide funding packages for affordable housing development. OHCS intends to utilize the same standards for both programs to balance affordability with the opportunity to build financial security and wealth for owners of manufactured homes through maintaining and improving their current home asset.

The replacement program will offer 15-year forgivable, no interest, zero payment loans. These affordable financing options are tailored to the needs of LMI households and their available personal resources ensuring financial security. By providing access to sustainable public financing, we empower LMI households with stable homeownership while building equity and wealth. If homeowners decide to sell before the loan matures, they must sell to an income-qualified buyer or pay back the prorated amount of the loan, ensuring the homes themselves will remain affordable for a minimum of 15 years.

Park preservation through the agency's current resources provide financial support for the acquisition and preservation of at-risk manufactured home parks. Using PRICE resources to continue facilitating park preservation, the long-term affordability of manufactured housing options for LMI households is ensured while also safeguarding opportunities for homeowners to build and keep equity through stable 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.

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

Protecting Manufactured Home Residents

Manufactured Home Repair and Replacement Program (MHRRP)

PRICE repair and replacement funds are utilized within preserved, nonprofit, or cooperative owned parks, as these communities are contractually obligated to maintain affordable rental spaces and enforce income eligibility limits for new residents. Significant marketing efforts for MHRRP will be made within preserved parks as many of these communities are resident-owned and include resident boards and committees composed of community members with decision-making power on space rents, review resident complaints, manage the Homeowners Association bylaws, and enforce lease violations.

The existing OHCS *Manufactured Home Replacement Program* eligibility terms, which will be mirrored with PRICE program funds, require that participating homes be located:

- In a nonprofit or cooperative owned community
- On private land owned by the program participant, or
- If the home is located in a privately owned, for-profit manufactured home park, the park owner must enter into a written affordability agreement with OHCS. The affordability agreement is intended to acknowledge and ensure that the program participant's tenant rights are understood by the park owner and enforced by the agreement.

Manufactured Dwelling Park Preservation (MDPP)

Park preservation complements a 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. MDPP's long-term 60-year (minimum) affordability restrictions reduce the risk of resident displacement due to rapid increases in property and home values. Coupled with resources for park infrastructure improvements, residents in preserved parks feel secure in their housing because they *are* secure.

OHCS Manufactured & Marina Communities Resource Center (MMCRC)

Another principal OHCS manufactured housing program, the *Manufactured & Marina Communities Resource Center (MMCRC)*, was created by the Oregon Legislature in 1989 to provide services and to support activities for the improvement of manufactured dwelling park landlord/tenant relationships and encourage the resolution of disputes without legal remedy.

Today, the MMCRC provides confidential, neutral third-party assistance to landlords and tenants of manufactured dwelling communities, facilitates resident committee technical assistance, offers referrals to mediation and legal aid resources, and supports navigation of other manufactured housing assistance resources. It also tracks landlord continuing education requirement compliance. The MMCRC offers a grant program that supports community dispute resolution centers (CDRCs) and mediation opportunities to residents and landlords of manufactured home park communities. CDRCs offer no-cost mediation and dispute resolution services for tenant/landlord and tenant/tenant conflicts.

OHCS funds MMCRC activities through state mandated annual park and marina registration fees.⁷ Residents benefiting from PRICE resources have access to MMCRC programs without additional investment needed.

State of Oregon Statutory and Administrative Rule Protections for Residents

The agency's PRICE proposal will work in conjunction of a slate of legal protections that the state of Oregon has implemented aiming to protect tenants, including manufactured homeowners who typically rent their lot space. OHCS has adopted corresponding Oregon Administrative Rules that assist in facilitating the enforcement of these statutes including notice of intent to sell, notice of facility closure, and notice of conveyance of a manufactured home facility.

⁷ oregon.gov/ohcs/mmcrc/Pages/park-registration

Oregon Revised Statute 90.842-90.860 requires:

- Advance written notice to all residents of a community, and OHCS, when an owner of a manufactured home park intends to sell the park or when considering a purchase offer.
- Opportunity for a park residents' committee to make a competing offer to purchase the facility and requires the owner to consider the residents' offer to purchase the park.

Oregon Revised Statute 90.600:

- Restricts rent increases to once per 12-month period.
- Caps annual rent increases, including lot and space rents, at 10 percent per year, as calculated by the Oregon Office of Economic Analysis.⁸

Oregon Administrative Rules 813-065-0100 outlines processes requiring that park owners:

- Provide advance written notice to all tenants of the park, as well as OHCS, when a park will be closed or will have a transfer of deed.
- Provide monetary compensation to tenants when owners fail to provide adequate notice.

Oregon Revised Statute 813-065-0100 requires that OHCS:

- Encourage manufactured dwelling park landlords to inform the agency of manufactured dwelling park spaces that become available for rent and provide the department with descriptions and other relevant information regarding those spaces.
- Take reasonable means to make the descriptions of available manufactured dwelling park rental spaces accessible by the public. The agency created and maintains an online public Manufactured Home Park Directory.⁹
- Make reasonable efforts to increase public awareness of the agency as a source for information concerning available manufactured dwelling park rental spaces.

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

Resources for Underserved Communities in Oregon

The program will offer repair 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. 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.

⁸ oregon.gov/das/oea/pages/rent-stabilization

⁹ experience.arcgis.com/experience/90949a36b98f4f0f8a204acd3aa2acf9

Physical ADA home upgrades are an eligible use of repair funds, and often can mean the difference between safely living in a home and facing life-threatening risks.

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. The grant funding made available through park preservation and the pairing of the OAHTC puts financing options in the hands of mission-driven ownership entities that would otherwise be out of reach.

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.

Subfactor (b)(iii): Environment and Resilience (15 points)

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

Hazard Mitigation Strategies

In addressing significant hazards that could impact manufactured housing sites, OHCS recognizes the importance of proactive mitigation activities to enhance the resilience of manufactured homes and associated infrastructure. The following significant hazards and the corresponding mitigation activities will continue with PRICE grant resources:

Natural Disasters

- **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:** Utilize fire-resistant construction materials and landscaping practices, create defensible space around homes, and establish emergency evacuation plans to mitigate the impact of wildfire damage. Provide road paving for easier evacuation. Provide more dependable water access for fire control.

Extreme Weather Events

- **Wind-resistant Design:** Retrofit manufactured homes to improve resistance to high winds, including installation of wind-rated roofing materials, 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

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

Infrastructure Failures

- **Upgrades:** Invest in park infrastructure, such as improving water and sewer systems, upgrading electrical systems, and maintaining roads and drainage, to ensure the reliability of essential services.
- **Power Sources:** Park preservation resources can be used to purchase and install backup generators serving manufactured home communities.

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

Oregon's Variable Climate and Associated Natural Hazards

Oregon's diverse climate zones expose manufactured homes to various natural hazards, ranging from wildfires and winter storms to earthquakes and tsunamis. Homes located on the coast face risks like tsunami, earthquakes, flooding, landslides, and wildfires, while those in Southern Oregon and the Willamette Valley contend with wildfires, winter storms, and landslides. In Central and Eastern Oregon, hazards include wildfires, winter storms, windstorms, hail, dust storms, and drought. These hazards pose significant challenges, particularly for LMI households.

The *PRICE Manufactured Home Repair and Rehabilitation Program (MHRRP)* is designed to bolster the resilience of manufactured homes against natural disasters. Trained professionals conduct home evaluations to prioritize necessary improvements tailored to each home's specific needs. For homes in wildfire-prone areas, measures include fire-resistant materials, ember-resistant vents, and defensible space planning. In flood-prone regions, elevation improvements and flood-proofing measures are implemented. Educational outreach programs educate homeowners about hazard risks and preparedness measures.

Manufactured Dwelling Park Preservation (MDPP) focuses on enhancing the infrastructure of manufactured home parks to withstand natural disasters. Investments in sewer and wastewater systems, fire code compliance upgrades, and other infrastructure improvements make parks more resilient. These enhancements benefit LMI families residing in these parks by reducing risks associated with hazards like flooding and wildfires. Educational programs inform residents about emergency preparedness, evacuation routes, and community resilience plans.

LMI households are disproportionately vulnerable to weather-related hazards due to limited resources for mitigation and recovery. The agency's proposal prioritizes these households by providing direct funding for hazard mitigation measures and educational resources on disaster preparedness. By promoting weather-resistant and climate-appropriate materials, we ensure that all projects across different climates effectively mitigate risks and enhance resilience.

The approach integrates climate-appropriate materials and practices tailored to regional climate variations. This includes implementing design standards that consider future climate change impacts. By adapting strategies to local climate conditions and community needs, we ensure the long-term sustainability and resilience of manufactured housing communities statewide.

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

Advancing Environmental Justice

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

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 Main 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 equipment and materials. Home repair and rehabilitation will improve indoor air quality by mitigating energy leaks, moisture, mold, and mildew.

When home replacement is necessary, they will be purchased via forgivable loans and 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, greatly improving home indoor air quality. Modern manufactured homes are built with fire-resistant materials and OHCS will ensure all homes purchased under the replacement piece of the program meet all state fire safety standards.

Infrastructure improvements tied to park preservation resources build park environmental resiliency and viability for the long-term.

- *OHCS Racial Equity Analysis Tool (REAT)*

The use of this customized REAT supports agency decision-makers in developing and taking actions that reduce racial inequities and put resources within reach across all regions of the state of Oregon. OHCS aims to bring considerations of racial equity meaningfully and consciously into operations, policymaking, and service delivery. Every new program implementation plan, as well as established program offerings, go through a detailed REAT review which serves to institutionalize considerations of racial equity.

Part of racial equity analysis requires staff to investigate the root causes for inequitable housing outcomes by examining the decisions and divestment of the past. Evaluation of program design is especially prudent when working to advance environmental justice and addressing systems that lead to communities of color being environmentally overburdened.

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

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

Community and Stakeholder Engagement Plan

OHCS enjoys a robust and engaged network of legislative champions, manufactured housing developers, manufactured home builders, nonprofit partners, passionate manufactured homeowners, and 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 has been significant statewide interest in HUD’s PRICE grant opportunity. In addition to the external collaboration included in the application, the agency’s Community Engagement Section and Communications Section of the Public Affairs Division crafted the following stakeholder engagement plan in collaboration with other divisions.

Barriers outlined in *Narrative C Need, Factor (a)* were compiled from input from internal staff and external manufactured housing stakeholders. The agency is in regular communication with these entities, many with whom the agency is currently working together on projects and policy, including the agency’s 2025 – 2027 biennial legislative budget request.

Public Engagement Plan & Milestones

- Posted the agency’s draft PRICE Main application on its corresponding webpage¹⁰ linked to the OHCS homepage¹¹ to ensure ease of navigation in compliance with Section VI.E.

¹⁰ oregon.gov/ohcs/mmrc/Pages/PRICE-grant

¹¹ oregon.gov/ohcs/

- Hosted (1) virtual public hearing and (1) hybrid in-person/virtual public hearing in Salem, Oregon. The venue was ADA accessible and clearly marked for members of the public. Spanish and ASL interpretation were provided both hearings.
- Presented HUD PRICE Main Notice of Funding Availability to the Oregon Legislature seeking approval to apply during an interim committee hearing, May 31st.¹² Legislators heard a summary of the funding opportunity, an overview OHCS’ application proposal, and asked questions. OHCS received application approval and must report back to the Legislature if awarded.
- Coordinated with manufactured housing partners with direct contact to manufactured housing residents and communities including the OHCS Tribal Housing Workgroup.
- OHCS Communications Team issued technical advisories with information on virtual and in-person public hearings and the public comment period through the agency’s extensive email distribution lists and social media channels.
- Posted recordings and presentation slides from public hearings on PRICE webpage.
- Offered public feedback opportunities via traditional mail, email, public hearings, community meetings, and survey.
- Provided application presentations at recurring stakeholder meetings, both hosted by OHCS and external partners.
- Maintained grant application and program information on OHCS’ [Manufactured & Marina Communities](#) webpage with resources, program information, and directories.

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

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 Consolidated Plan 2021 – 2025¹³***

OHCS has identified manufactured housing as a high priority housing need with the goal of increasing “homeownership among LMI households, including mortgage loan programs, asset building resources, down payment assistance, lower cost homeownership through preservation and improvement of manufactured housing,” especially among families of color. The agency’s proposal complements these plans by providing resources and support for manufactured housing preservation and lower cost homeownership opportunities.

¹² <https://olis.oregonlegislature.gov/liz/2023I1/Committees/EB/2024-05-31-08-30/Agenda>

¹³ oregon.gov/ohcs/development/pages/consolidated-plan

▪ ***OHCS Preservation Strategy Framework***¹⁴

The agency’s preservation of affordable housing framework articulates a clear rationale for sustained investment in preservation and forecasts the need over the next 10 years and beyond. Manufactured dwelling park preservation is one of 4 key preservation strategies for the agency, making millions available to fund acquisitions each biennium through park preservation funds and the OAHTC, an area the agency believes is ready for expansion and additional investment.

Preservation is a priority among many housing partner organizations, coordinating with the agency to highlight the need for state lawmakers for adequate resources. Representative Pam Marsh, Chair of the House Housing and Homelessness Committee, has made manufactured housing a centerpiece of her housing agenda. Her counterpart, Chair of the Senate Housing and Development Committee, Senator Kayce Jama, has focused his efforts on affordable housing preservation. At its May 30th, 2024, hearing, the agency received informal approval of the Preservation Strategy from legislative leaders.¹⁵

▪ ***Oregon Housing Needs Analysis (OHNA) Recommendations Report***¹⁶

The 2022 Oregon Housing Needs Analysis identifies shortcomings in the current planning strategies for "needed housing" and can overlook housing types like manufactured housing. They primarily reflect past development trends rather than future affordability and needs for current and future residents. It emphasizes the need for state investment in and planning for “diverse housing options the market is unlikely to produce, including manufactured housing.”

▪ ***OHCS Statewide Housing Plan***¹⁷

The agency’s strategic statewide housing plan has 6 key priorities:

1. Advance equity and racial justice to address disparities in housing
2. Build a statewide effort to prevent and end homelessness
3. Invest in permanent supportive housing for Oregonians with high acuity needs
4. Gain ground in closing the affordable housing gap
5. Expand homeownership opportunities for low- and moderate-income Oregon families
6. Unlock housing opportunities in small towns and communities

OHCS’ PRICE Main proposal is aligned and seeks to make meaningful progress toward all six.

▪ ***Fair Housing Law & Analysis of Impediments***

OHCS activities adhere to fair housing law and objectives outlined in fair housing plans and ensure access to housing opportunities for all residents. The agency formally partners with the Fair Housing Council of Oregon to support activities across the state. All preserved parks utilizing OHCS resources must create and adhere to their AFHMP for any rental units.

¹⁴ oregon.gov/ohcs/development/Documents/Preservation%20Report_2023.pdf

¹⁵ olis.oregonlegislature.gov/liz/202311/Committees/SHDEV/2024-05-30-08-30/Agenda

¹⁶ oregon.gov/lcd/Housing/Documents/20221231_OHNA_Legislative_Recommendations_Report.pdf

¹⁷ oregon.gov/ohcs/Documents/swhp/swhp-full-plan.pdf

Narrative Exhibit E – Capacity

Factor (c): CAPACITY (Maximum 20 points)

· *What experience do you have managing projects?*

OHCS: Oregon’s State Housing Finance Agency

Established in 1971, Oregon Housing and Community Services (OHCS) was established to serve as the state’s Housing Finance Agency (HFA) and to administer federal and state housing programs and policies. Today, OHCS is responsible for a biennial budget of more than a billion dollars in federal and state resources and administers a wide range of federal and state programs including affordable rental housing development and preservation, eviction prevention and rental assistance, and first-time homebuyer subsidies for low- and moderate-income Oregonians.

Since its inception 35 years ago, OHCS has been responsible for funding more than 75,000 units representing over \$5 billion invested in affordable housing. In the 2023-2025 biennium alone, OHCS secured \$1.14 billion from the Oregon Legislature to continue addressing the state’s ongoing affordable housing crisis. OHCS provides resources for Oregonians to reduce poverty and increase access to stable housing. The focus on both housing and community services allows the agency to serve Oregonians holistically across the housing continuum, including preventing and ending homelessness, assisting with utilities, providing housing stability support, financing multifamily affordable housing, weatherization, and opportunities for homeownership.

Proposing, Implementing, Managing, and Coordinating Community Development

In addition to proven experience implementing manufactured home programming, OHCS has decades of experience administering community development programs with the CDBG framework used for the PRICE grant.

OHCS has demonstrated experience and existing capacity that is specific to the manufactured housing activities proposed in this PRICE Main application, with manufactured housing programming currently being implemented in three OHCS divisions: 1) Affordable Rental Housing, 2) Homeownership, and 3) Disaster Recovery and Resilience. Staff in these divisions are familiar with the funding, and community-based challenges inherent working with manufactured housing programs and are skilled in identifying collaborative solutions to overcoming identified barriers to meeting stated goals of projected outcomes.

- 1) The **Affordable Rental Housing Division (ARH)** has been working with external partners on manufactured dwelling park preservation for nearly 30 years with roughly \$60 million in investments in the state’s manufactured housing communities. *Manufactured Dwelling Park Preservation* remains in high demand even as available funds ebb and flow.

- 2) The **Homeownership Division (HOD)** will leverage existing partnerships, expertise, and operations from the Manufactured Home Replacement Program to stand up the *Manufactured Home Repair and Replacement Program (MHRRP)* with PRICE Main resources. The Manufactured Home Replacement Program delivered almost \$6 million to replace nearly 30 homes for LMI Oregon families.

- 3) The **Disaster Recovery and Resilience Division (DDR)** was established in response to the massive destruction of the 2020 Labor Day wildfires and straight-line winds. OHCS was allocated \$150 million by the Oregon Legislature to support housing and community recovery and has used existing and developed new programs to support the development of permanent replacement housing, including manufactured homes, infrastructure repair, and rent and housing navigation assistance for Oregonians impacted by the fires.

 DRR is focused primarily on implementing a series of programs, called *ReOregon*, funded by a \$422 million HUD CDBG-Disaster Recovery grant.

Partner and Client References

OHCS’ network of external partners is vast. In carrying out PRICE grant activities, OHCS will likely rely on existing partnerships with Community Action Agencies, Oregon-based CDFIs, and manufactured housing nonprofits. The following partners have enthusiastically endorsed OHCS’ application and welcome outreach from HUD to confirm the agency’s experience, capacity, and collaborative approach.

CASA of Oregon	Lisa Rogers – Deputy Director lrogers@casaforegon.org (503) 687-3306 casaforegon.org
Community Action Partnership of Oregon (CAPO)	Janet Allanach – Executive Director janeta@caporegon.org (503) 789-7451 caporegon.org
Energy Trust of Oregon (ETO)	Mark Wyman – Senior Manager, Innovation & Development Strategies mark.wyman@energytrust.org (503) 445-2950 energytrust.org
Network for Affordable Housing (NOAH)	Ann Remmers – Executive Director ann@noah-housing.org (503) 223-3211 noah-housing.org
St. Vincent DePaul of Lane County	Kinser Fleming – Property Management Director kinser.fleming@svdp.us (541) 321-3666 svdp.us

· *What is your experience using grant funds?*

Federal Grant Management Experience

Serving as the Housing Finance Agency (HFA) for the State of Oregon, OHCS has decades of demonstrated experience successfully managing and expending federal grant funding to guide successful implementation of proposed PRICE Main grant funding. The agency recognizes the value of tracking results not only for compliance purposes, but so that partners, legislators, other HFAs and government agencies, nonprofits and the public can be kept informed of its work.

- ***CDBG-DR.*** HUD awarded Oregon \$422 million in CDBG-DR funds for recovery efforts in response to the 2020 Oregon Labor Day Fires. These funds created new programs to help individuals, households, and communities continue to recover. This effort, dubbed *ReOregon*, provides funds to rebuild and create new permanent housing in the areas most impacted by the fires. Staff working on these programs are experienced with the Disaster Recovery Grant Reporting (DRGR) grant tracking and reporting platform that will be used for implementation of PRICE grant resources.

- ***HUD Community Planning and Development (CPD) Programs.*** As a HUD grantee for HUD CPD entitlement funding, OHCS currently administers HOME, Federal Housing Trust Fund (HTF), HOME-ARP, CDBG-DR, NSP, and Emergency Shelter Grant (ESG) funding. These resources fund housing and services that address community needs identified in the Consolidated Plan and Annual Action Plan, including the Analysis of Impediments to Fair Housing. Current OHCS staff ensure compliance with federal cross cutting requirements and the regulations associated with each funding source, including ongoing compliance and affordability requirements.

OHCS has been a HUD Project-Based Contract Administrator (PBCA) for more than 20 years, performing inspection, monitoring, and project-based subsidy payments duties through our HUD Contract Administration (HCA) in the Affordable Rental Housing Division. The agency performs compliance monitoring for HUD-specific programs throughout the state utilizing TRACS, EIV, iREMS, iMAX, and eLOCCS for its compliance reporting.

- ***Administration of Development Grants and Tax Credits.*** In addition to HUD CPD and MFH programs, OHCS also administers federal Low-Income Housing Tax Credits (LIHTC), Oregon Housing Development Grant Program (HGDP), General Housing Account Program (GHAP), Oregon Multifamily Energy Program (ORMEP), Oregon Affordable Housing Tax Credit (OAHTC), Preservation Resources, Manufactured Dwelling Park Preservation (MDPP), Agricultural Workforce Housing Tax Credit (AWHTC), Modular Housing Development Fund (MHDF), Permanent Supportive Housing (PSH) Project-based Rent Assistance and Services Funding, and Co-Location of Affordable Rental Housing and Early Care (CARE).

Responsible for the compliance of more than 1,400 properties, OHCS has active oversight through the Portfolio Administration (PA) Section. For compliance, Compliance Officers provide ongoing inspection, record maintenance, and management review responsibilities. PA also includes Asset Management professionals who provide fiscal assistance and risk management

oversight for the entire OHCS housing portfolio. All units with federal funds are required to comply with Section 504 as outlined in the agency’s Core Development Manual (CDM).

OHCS Success Story

A recently programmed fund, HOME-American Rescue Plan (ARP), is an example of OHCS utilizing a federal resource to meet local needs.

HOME-ARP was programmed to provide housing with supportive services to rural areas of the state that often are unable to build projects large enough to make a Permanent Supportive Housing (PSH) program cash flow. By pairing HOME-ARP with state capacity building resources and leveraging local PHA project-based rent assistance and other types of rental support, OHCS coordinated local networks and provided them with technical assistance for housing developments that are meeting the unique needs of their communities.

Timing was a key factor for these local networks, as the HOME-ARP resources allowed for patient use of resources while encouraging collaboration and resource leveraging. OHCS is on target to expend these funds with timely award of development resources through HOME-ARP to a community development that will provide supportive services to clients utilizing their local coordinated entry system. OHCS expects to make several additional awards in the near-term as community plans come together resulting in locally driven developments.

· *Who are your key staff?*

OHCS Key Staff & Program Management Roles

In addition to a strong network of dedicated external manufactured housing partners, OHCS is fortunate to have knowledgeable, seasoned, and passionate staff designing, administering its programs. 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’ capacity and readiness to hit the ground running, if awarded. As a state agency with experienced management, significant oversight from the state legislature, and critical support staff and expertise, contingency planning is built into every implementation process. Agency executive leadership reprioritize staff and resources as needed to comply with all federal and state program compliance obligations. Like other organizations, OHCS experiences staff turnover, initiative swings, and other obstacles that could result in staffing changes, however, due to its size, structure, and resources, OHCS is confident that any unforeseen challenge will not result in program delays.

While the following list is not exhaustive, with dozens of additional support staff members across all divisions of the agency including Public Affairs, Procurement, IT, and the agency’s Executive Leadership team, these key FTE roles reflect the work already underway in the manufactured housing space that will allow the agency to extend its current reach.

Manufactured Home Repair and Replacement Program (MHRRP) | OHCS Homeownership Division, Manufactured Housing Section

The following are the key staff who will administer the *Manufactured Home Repair and Replacement Program (MHRRP)* and coordinated with the OHCS Energy Services Section to establish partner agreements for program referrals. These staff members administered the 2022-2023 Manufactured Home Replacement Program.

Rick Abrego	Assistant Director, Manufactured Housing Section Manager, Manufactured & Marina Communities Resource Center
Kari Hodai	Manufactured Housing Program Manager
Shauna McDonough	Manufactured Housing Program Analyst
Everett Horvath	Manufactured Housing Program Navigator
Adrian Camero	Manufactured Housing Program Analyst

Manufactured Dwelling Park Preservation (MDPP) | OHCS Affordable Rental Housing Division

The following are the key staff who currently administer the *Manufactured Dwelling Park Preservation (MDPP)* resources. These staff members will oversee the administration PRICE preservation resources in accordance with grant requirements.

Michael Parkhurst	Policy and Initiatives Manager Former Preservation Program Manager
Kyle Pierce	Affordable Housing Preservation Program Manager
Kate Hillig	Production Analyst, Manufactured Dwelling Park Preservation

Home Weatherization and Energy Programs | OHCS Housing Stabilization Division, Energy Services Section

Energy Services administers federal Department of Energy (DOE) and state funded programs like the Oregon Multi-Family Energy Program. Staff will coordinate with other divisions for opportunities to braid eligible funds to maximize impact. This section regularly partners with CAAs and will be instrumental in establishing new agreements for PRICE related activities.

Dan Elliott	Senior Operations and Policy Analyst
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Resource and Tax Credit Leverage Management | OHCS Affordable Rental Housing Division, Development Resources Section

The following are the key staff who oversee development resources and Oregon’s Affordable Housing Tax Credit program. They will continue to manage these programs in support of the preservation team’s work with PRICE resources.

Amy Cole	Assistant Director, Development Resources Section
Martin Jarvis	State Tax Credits Program Analyst, OAHTC

HUD Contract Administration | OHCS Affordable Rental Housing Division

The following staff ensure compliance for federal programs and grants. Collectively, they have over two decades of experience working with HUD and its rules and standards.

Sara Carrillo	HUD Contract Administration Section Manager
Andrea Matthiessen	Senior HUD Program Analyst
Erin Nieman	Federal Cross-Cutting Analyst

External Engagement and Communications | OHCS Public Affairs Division

The following are key staff who help maintain our external relationships with partners, lawmakers, and the public, including persons with limited English proficiency and persons with disabilities. They facilitate regular, transparent communication, and have contributed substantially to the agency’s public participation and engagement planning for its PRICE grant application. These staff will continue to maintain open channels of communication from implementation throughout the full PRICE grant program period.

Fiona Bai	Strategic Communications Coordinator
Emily Arnold	Community Engagement Specialist
Tanisha Rosas	Senior Legislative Coordinator

HUD PRICE Grant Lead | OHCS Affordable Rental Division, Planning and Policy Section

This staff member will act as the point of contact for this grant application, providing project coordination and planning between agency divisions for application activities and oversee DRGR reporting obligations for grant resources. Approximately .1 FTE of Brit McLean’s time will be dedicated to providing grant coordination responsibilities.

The Planning and Policy Section of the Affordable Rental Housing Division is responsible for crafting implementation plans for new federal and state programs, updating policies and manuals, leading the division’s draft legislative budget request process, submitting grants for federal funding, and other project management functions.

Brit McLean	Operations and Policy Analyst
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External Partner Landscape, Roles, and Coordination

Although OHCS has not finalized partnerships, the agency expects to work with organizations with which it has successfully coordinated program design, implementation, and reporting efforts in the past. The following partners contributed greatly to the agency’s preservation work and manufactured housing programs, specifically.

CASA of Oregon is manufactured dwelling park preservation developer a consultant. They offer residents of investor-owned parks technical assistance, organizing muscle, legislative advocacy, and policy expertise during their journeys in transitioning to resident- and nonprofit-ownership.

Community Action Partnerships of Oregon (CAPO) is the governing body the Community Action Agencies throughout the state. These agencies partner with OHCS to provide many critical social services to their communities.

Craft3 is CDFI in Oregon offering several loan products for manufactured home communities and homeowners. They have partnered with NOAH on park acquisition preservation loans.

Energy Trust of Oregon (ETO) created the first manufactured home replacement program in Oregon utilizing funds for replacement and supported the agency's *Manufactured Home Replacement Program* offering up to \$16,000 in energy efficiency funding per site.

Network for Oregon Affordable Housing (NOAH) provides permanent, bridge, and predevelopment financing and loans for manufactured dwelling park preservation and cooperative conversions. They are a main policy and advocacy leader, critical community development finance partner, and technical assistance provider.

St. Vincent de Paul of Lane County and Hope Community is a nonprofit owner of 8 manufactured dwelling parks, specializing in acquiring and rehabilitating parks with profound challenges. They are also one of Oregon's many manufactured housing producers with their factory in Eugene, Oregon building low-cost, durable, and resilient homes.

Contingency Planning

OHCS is committed to mitigating risks that could impact successful implementation of programs with PRICE resources.

Staff. Roles and responsibilities have been conceptualized in the application and will be formalized upon grant award. The PRICE Main Project Lead will consider the impact of potential departures of key roles on PRICE Main project continuity and delivery to ensure smooth transitions. Procedures, workflows, and will be documented to limit loss of any institutional knowledge in the handover process. Because this grant is inter-divisional, there will be several staff members who will be prepared to assume critical roles when necessary.

Partners. The agency works jointly with a wide network of external, statewide partners limiting overreliance on specific entities. Partnerships have been discussed but not been formally determined related to PRICE Main grant funds, giving the agency the opportunity to collaborate with organizations that it deems ready to take on this work. The strong relationships with partner organizations equips the agency with several alternatives with similar expertise to facilitate rapid replacement in case of partner loss.

· *What is your experience promoting racial equity?*

Oregon Statewide Housing Plan Priority: Advancing Equity and Racial Justice

As one of the six priorities outlined in the OHCS Statewide Housing Plan, leading with Equity and Racial Justice in housing and economic opportunity is a state crosscutting requirement for all agency endeavors operationalizing this commitment throughout all program frameworks and resource offerings. With the support and leadership of Oregon’s Housing Stability Council and the agency’s Executive Team, equity and racial justice has been clearly and consistently signaled as a non-negotiable piece of the agency’s work.

- ***DEI Action Plan.*** In 2019, OHCS implemented a Diversity Equity and Inclusion (DEI) agreement to which all recipients of development resources have been required to review and commit. In 2024, OHCS expanded the initial DEI agreement, moving from an awareness and commitment model toward an actionable reporting process called the *DEI Action Plan*: partners commit to reviewing organization-wide DEI efforts, identifying areas of improvement, and reporting progress annually.¹⁸
- ***Minority, Women-Owned, and Emerging Small Business Requirements.***¹⁹ OHCS requires development sponsors to seek Certification Office for Business Inclusion and Diversity (COBID) and non-COBID certified MWESB professional firms to increase the participation level of minority-owned businesses in its construction project. OHCS also encourages the use of local labor and partnering with the community to help build healthy, affordable homes, which addresses OHCS's goal of increasing apprenticeship programs in Oregon and improving economic and social vitality.
- ***OHCS Racial Equity Analysis Tool (REAT).*** The agency operationalizes its Statewide Housing Plan goal of advancing Equity and Racial Justice by soliciting and integrating feedback from Black and Brown communities into program design and implementation strategies. The REAT is pivotal in recognizing, understanding, and rectifying historical injustices, particularly in environmental justice initiatives, where the agency strives to mitigate systemic burdens on communities of color.

Tribal Nation resource set-asides are very common in OHCS programming and operate differently depending on the source of funds. For PRICE specifically, our consultation with the state’s Tribal Nations revealed that its original approach to Tribal partners would not meet their needs, instead opting to utilize a set-aside that they did not have to directly administer. Referrals for preservation, repair, and replacement requests will be taken via CAAs and other community-based organizations rather than Tribal governments overseeing implementation.

- ***Capacity Building Program.*** Community-based nonprofit housing developers, local housing authorities, and Tribal Nation housing entities are uniquely positioned within their communities to support placemaking and provide culturally specific and responsive housing and resident services, and General Housing Account Program (GHAP) Capacity Building

¹⁸ oregon.gov/ohcs/rental-housing/housing-development/oregon-centralized-application-orca/pages/orca-diversity-equity-inclusion-agreement

¹⁹ oregon.gov/ohcs/development/pages/mwesb-sdvbe-rental-housing

Program was created to invest in the growth of culturally responsive development towards meeting Oregon’s immediate and long-term needs for safe, stable housing.

· *What is your experience completing environmental reviews?*

Environmental Review: State Government 24 CFR part 58

As the state housing agency for the State of Oregon, OHCS is well versed in the requirements associated with Part 58 environmental reviews. Programs such as HOME, HOME-ARP, HTF and CDBG-DR require that a Part 58 environmental review be completed prior to committing these funds to eligible projects and activities. OHCS meets this regulatory requirement in different ways depending on the division:

Affordable Rental Housing Division (ARH) has a dedicated Cross-cutting Analyst position, responsible for completing all Part 58 environmental reviews. ARH has developed acknowledgement forms on the nuances of choice limiting actions, project aggregation, and the public comment periods associated with submitting the Request for Release of Funds (RROF) to HUD in order to receive the Authority to Use Grant Funds (AUGF).

Disaster Relief and Recovery (DRR) conducts Part 58 Environmental Review utilizing consultants complete the environmental review checklist.

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

Extensive Experience with Cross-Cutting Federal Requirements

OHCS has significant experience and expertise complying with federal cross cutting regulations. Implementation of HOME, HOME ARP, HTF, and HUD 811 rent assistance have resulted in OHCS creating a dedicated cross-cutting analyst position to ensure that 2 CFR part 200, Davis-Bacon labor standards, fair housing laws, Uniform Relocation Act, and where applicable, the Lead-safe Housing Rule compliance has clear documentation requirements that are communicated to stakeholder and collected and reviewed by OHCS in a timely manner.

Davis-Bacon labor standards are strictly enforced in all applicable OHCS-funded projects. This includes ensuring that prevailing wage rates are paid to construction staff engaged in federally funded projects, thereby supporting fair compensation and labor practices.

The agency integrates nondiscrimination requirements, including the Fair Housing Act requirements into all aspects of our housing programs to prevent discrimination based on race, color, religion, sex, national origin, disability, or familial status.

OHCS adheres to the Uniform Relocation Act (49 CFR part 24) to protect individuals and businesses displaced by federally funded projects.

Narrative Exhibit F – Leverage

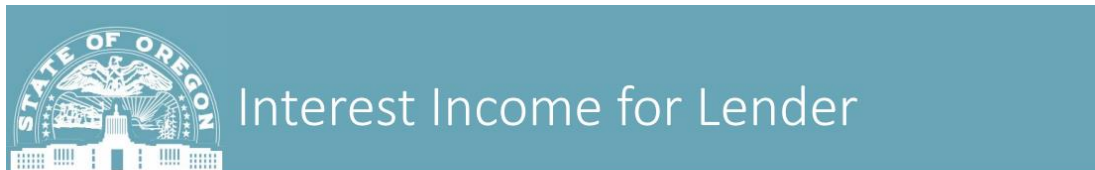
Factor (d) MATCH OR LEVERAGE (Maximum 5 points)

PRICE Main Leverage Funding: the Oregon Affordable Housing Tax Credit Overview

The Oregon Affordable Housing Tax Credit program (OAHTC) aims to stimulate the development of affordable housing across the state by incentivizing private lenders to offer financing for the development and preservation of affordable housing in Oregon. The OAHTC is a funding tool unique to Oregon providing a state tax credit to financial institutions who agree to reduce interest rates on permanent loans for affordable housing projects by up to 4 percent. A credit certification is valid up to a maximum of 20 years.

OHCS certifies loans to qualified, eligible borrowers. In the case of park preservation projects, these entities may be resident cooperatives, nonprofits, housing authorities, and local governments. These tax credits have grown in utilization over time, with the annual allocation raised regularly to its highest current cap of \$35 million in 2021 by the Oregon Legislature.

The \$35 million cap is the cumulative total of all outstanding OAHTC-attached loans generating a credit each year. As the loan amounts are paid off, new credits are generated based on a calculation of the remaining balance, the length of time over which the loan is amortized, and the interest rate reduction up to the statutory limit of 4 percent. The interest rate reduction is set at the beginning of the loan and remains the same throughout the term of the loan, an initial maximum of 20 years, OAHTC compliance period. Over the course of the loan term, the credit generated gradually diminishes, creating room for more OAHTC-attached loans.



An OAHTC Example \$1.5 Million Loan 10-Year Term							
Year	Loan with a 5% Interest Rate			Loan with a 1% Interest Rate			Tax Credits
	Principal	Interest	Payment	Principal	Interest	Payment	
1	\$119,257	\$75,000	\$194,257	\$143,373	\$15,000	\$158,373	\$60,000
2	\$125,220	\$69,037	\$194,257	\$144,807	\$13,566	\$158,373	\$55,471
3	\$131,481	\$62,776	\$194,257	\$146,255	\$12,118	\$158,373	\$50,658
4	\$138,055	\$56,202	\$194,257	\$147,717	\$10,656	\$158,373	\$45,546
5	\$144,957	\$49,299	\$194,257	\$149,195	\$9,178	\$158,373	\$40,121
6	\$152,205	\$42,052	\$194,257	\$150,687	\$7,687	\$158,373	\$34,365
7	\$159,816	\$34,441	\$194,257	\$152,193	\$6,180	\$158,373	\$28,262
8	\$167,806	\$26,450	\$194,257	\$153,715	\$4,658	\$158,373	\$21,793
9	\$176,197	\$18,060	\$194,257	\$155,253	\$3,121	\$158,373	\$14,940
10	\$185,007	\$9,250	\$194,257	\$156,805	\$1,568	\$158,373	\$7,682
Total	\$1,500,000	\$442,569	\$1,942,569	\$1,500,000	\$83,731	\$1,583,731	\$358,837

The most common loan terms offered by lenders to sponsors seeking to utilize the OAHTC program are a full 4 percent interest rate reduction for the loan term and a 35-year amortization.

For example, \$1 million in reserved OAHTC would incentivize \$25,223,130 in loans. With elevated interest rates for borrowers, OAHTC gives park preservation sponsors access to larger amounts of private capital at a much lower cost, generating equity in the park project.

By incentivizing private sector involvement, the OAHTC program plays a vital role in addressing housing affordability challenges statewide, fostering community stability, and supporting economic development initiatives.

Since 2005, nearly \$50 million in OAHTC-attached loans have been directed to park preservation projects resulting in more than 33 parks receiving critical infrastructure upgrades, adopting cooperative and nonprofit ownership models, and ensuring long-term affordability.

OHCS Leverage Commitment and Ratio

The agency firmly commits \$20 million in OAHTC equity by holding leverage of OAHTC resources to cover up to \$300 million in permanent debt through interest rate reductions to support PRICE Main activities for the duration of the program period, October 2024 – September 2030. This is a ratio of 25:1 for tax credits to loans. For OHCS' grant request of \$11,000 million for park preservation activities, this is nearly a 2:1 match in tax credit leverage.

Tax credits awarded to park preservation projects, however, will far outlast the PRICE program. At the end of the 20-year term, projects can refinance their existing loans to get a new OAHTC-attached loan to avoid paying the higher interest rates.

Contingency Plan and Managing Risk

Availability of OAHTC

While it is in the realm of possibility that the Oregon Legislature will choose not to extend the Oregon Affordable Housing Tax Credit when it next comes up for renewal in 2027, it is a well-established program with a great deal of support among Oregon lenders and affordable housing developers. OHCS is confident that there is very little risk to the OAHTC sunsetting. The Legislature has voted consistently not only to renew, but to increase, the annual OAHTC allocation cap since the program was created in 1989.

Oregon Governor Tina Kotek is endorsing an increase to the current OAHTC cap of \$35 million to \$45 million during the upcoming 2025 Regular Legislative Session. The agency and its partners will continue making the case for this critical state housing investment.

Reduced PRICE Main Award

Should OHCS not receive the full PRICE Main grant request amount of \$25 million, the agency will continue as planned to divide the award evenly between the two modified, existing programs. Adjusting to shifting funding levels is a necessary and common practice for OHCS, and it has the flexibility to scale down the scope of the two programs in alignment with a reduced PRICE award. OHCS will maintain its OAHTC leverage commitment, as detailed above, for the duration of the PRICE program period, regardless of the total PRICE Main award amount received.

Narrative Exhibit G – Long-term Effect

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

· How will your proposed activities retain other affordable housing opportunities for LMI households in the community?

Long-term Retention of Affordable Manufactured Housing Options in Oregon

Designed to ensure the long-term affordability of housing without ongoing subsidy, the proposed combination of targeted interventions, affordability enforcement mechanisms, and cooperative ownership models via both *PRICE Manufactured Home Repair and Replacement Program (MHRRP)* and *Manufactured Dwelling Park Preservation (MDPP)*, the agency and its partners will continue making an enduring impact on housing stability, affordability, and community resilience for low- and moderate-income households in Oregon.

By addressing critical maintenance needs, enhancing energy efficiency, affordability restrictions, and preserving manufactured communities through the pairing of state and local funds, the Oregon Affordable Housing Tax Credit (OAHTC) 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.

The *PRICE Manufactured Home Repair and Replacement Program (MHRRP)* will offer homeowners the opportunity to maintain their housing affordability by enhancing their homes' longevity and cost-effectiveness. Through energy efficiency upgrades, enhancements for disaster resilience, and critical capital improvements aimed at extending the operational lifespan of manufactured homes, these measures not only preserve housing affordability but also enhance the overall quality and sustainability of the housing stock for LMI homeowners in Oregon.

Program participants are required to be homeowners, use the manufactured home as their primary residence, and the home located in a preserved park, land owned by the homeowner, or in a park with a written affordability agreement with OHCS.

Through *PRICE Manufactured Dwelling Park Preservation (MDPP)*, OHCS will facilitate opportunities for residents to purchase and collectively and manage their manufactured home parks. Mission-driven nonprofits, Public Housing Authorities, and local governments are also eligible for park preservation resources. These efforts prevent displacement by placing the parks in hands that commit to maintaining this affordable housing for at least 60 years. By empowering residents and mission-driven nonprofits to become owners, the addition of PRICE Main resources will allow the agency to continue fostering community stability, wealth creation, and ensure long-term affordability for LMI households.

Through these affordability restriction mechanisms, the agency considers both of these programs to be critical homelessness prevention measures that will protect recipients of PRICE resources against being priced out of their communities.

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

Affordability for the Long-term

Data indicate that over 60 percent of manufactured homes in the state are owned by LMI households, highlighting the importance of preserving these homes. Eligible recipients of PRICE replacement grants will be equipped with no interest, zero payment 15-year forgivable loans to keep their homes and make them safer, healthier, and more resilient. Eligibility criteria are specific and require that participants have a household income at or below 80 percent AMI. To date, 75 percent of program participants under OHCS' Manufactured Home Replacement Program have been at or below 50 percent AMI.

Long-term affordability measures begin when participants 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 to sell their home to a program qualifying buyer. The program also assures that repair and replacement resources are not dedicated to homes where rising space rents threaten residents with homelessness. Repaired or replaced homes must be located within preserved parks, on the owner's land, or in a park with an affordability agreement with OHCS protecting residents from eviction after upgrades are made.

Affordability agreements are established and in place for 60 years for manufactured home parks receiving preservation funding through the agency's current program and will extend to park preservation resources through PRICE. These agreements ensure that lot rents and other fees remain affordable for residents, even as improvements are made to the park's infrastructure. By working with mission-driven park owners and residents to establish affordability agreements, the program will continue to protect LMI households from being priced out of their communities.

Addressing critical infrastructure deficiencies and implementing long-term affordability requirements, the program will enhance community stability without ongoing federal or state subsidy. Since 2011, OHCS has helped 33 manufactured home communities preserve their affordability, benefiting hundreds of LMI households.

- *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?*

Ensuring 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. Financing options for repair and replacement projects tailored to the specific LMI household will empower manufactured homeowners to maintain and continue to build equity in their homes and wealth over time. Because eligible homes for repair or replacement are restricted to parks with built-in lots space affordability, the program will continue to promote stable homeownership

Park preservation promotes stable homeownership options through several strategic approaches that ensure both the house and the lot on which it sits remain affordable and accessible in the long-term. OHCS facilitates the formation of resident cooperatives or ensures that purchasing entities are nonprofit organizations with a clear affordable housing mission. The affordability restrictions on properties within manufactured dwelling parks are designed to prevent displacement and speculative practices that otherwise threaten the long-term affordability of both the homes and the land they occupy. By ensuring that a significant percentage of homes within these parks are reserved for low- and moderate-income households, OHCS safeguards stable homeownership options for vulnerable communities.

Additionally, OHCS invests resources in critical infrastructure upgrades and maintenance within manufactured dwelling parks as part of the preservation strategy. This includes improvements to utilities, roads, and communal facilities, which are essential for ensuring the habitability and attractiveness of these communities over time. These investments not only enhance the quality of life for residents but also contribute to the overall value of the homes within these communities.

Collective control over the long-term planning and costs of upkeep of the park is a huge win for those homeowners and residents.

· How will your proposal support underserved communities in the long term?

Long-term Support 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.

Manufactured Home Repair and Replacement 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, the agency intends to address disparities in housing quality and promote equitable access to safe and healthy housing options, low-income seniors, and persons with disabilities overrepresented among manufactured homeowners. Repair and replacement grants allows residents to maintain the habitability of their homes so families can remain in their homes safely. Repairing manufactured home assists in protecting not just an asset, but a key wealth-building opportunity.

Manufactured Dwelling Park Preservation (MDPP)

Residents of manufactured home parks receiving preservation funding through PRICE park preservation to move to a cooperative ownership model receive financial counseling and technical 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, seniors, and persons living with disabilities in manufactured housing communities across the state.

· How will your proposal make manufactured housing or MHCs livable, sustainable, and resilient?

Healthy, Sustainable, and Resilient Homes and Communities

Through targeted repairs and replacement 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, these interventions 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.

Repair grants will be paired with U.S. Department of Energy (DOE) weatherization grants, administered by the agency's Energy Services Section, to add resiliency to these homes whenever possible. It is common practice for the agency to braid sources of funding to maximize impact for Oregonians.

Park preservation supports environmental hazard mitigation in manufactured home parks, such as soil remediation, water quality improvements, and pollution controls. Infrastructure improvements ensure that parks have safe drinking water and wastewater systems which are vital to supporting the health and safety of people that live in parks. Potable water, safe removal of wastewater, as well as availability of water for fire suppression are eligible uses of OHCS park preservation resources and will continue under PRICE.

Preference Points: Period of Affordability

OHCS seeks preference points under Section V.A.2 the NOFO for formal, written commitment to ensuring long-term affordability, as defined in Section VI.E of this NOFO, and stability in manufactured home communities across Oregon.

Under the PRICE *Manufactured Home Repair and Replacement Program (MHRRP)*, homeowners receive a 15-year forgivable, no interest, zero payment loan for repair and replacement of their homes in exchange for maintaining affordability for potential future owners at 80 percent AMI for the duration of the loan. Through this subsidized financing option, deed restriction, and income qualification, OHCS operationalizes its commitment long-term affordability for current and future homeowners.

Where homes are repaired or replaced within preserved parks, regardless of funding source, affordability terms are extended to 60-year commitments at minimum. These affordability requirements safeguard both the housing units and the land they occupy from market fluctuations and resident displacement. By prioritizing affordability over an extended period, our approach addresses the acute housing needs of underserved communities, ensuring that residents have reliable access to secure housing regardless of their tenure status within the community.

This commitment extends beyond individual homeowners to encompass entire communities through *Manufactured Dwelling Park Preservation (MDPP)*, where residents often face uncertainty due to escalating land costs or redevelopment pressures. OHCS' strategy coupled with PRICE resources stabilizes housing costs and promotes community resilience by preserving existing affordable housing stock and preventing displacement.

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, OHCS ensures the sustainability, affordability, and resilience of manufactured housing communities for years to come.

Required Attachment A – Advancing Racial Equity

Advancing Equity and Racial Equity: An OHCS Statewide Housing Plan Priority

Equity and Racial Justice is one of OHCS’ six key priorities in the agency’s strategic Statewide Housing Plan²⁰: Advance equity and racial justice by identifying and addressing institutional and systemic barriers that have created and perpetuated patterns of disparity in housing and economic prosperity. OHCS acknowledges the ways in which government, and actors on its behalf, have contributed to discrimination in access to housing, ability to secure financing to buy a home, and government investment in infrastructure and services that continue to echo through generations, compounding the challenges facing communities of color.

1. Demographic Data and Tracking

Although there is no comprehensive data on the racial makeup of manufactured homeowners and residents in Oregon, through its programs, Manufactured Home Park Registry, and external partners, the agency is able to track several key indicators.

The OHCS Manufactured Home Replacement Program gathers voluntary demographic information on gender, race, ethnicity, age, disability, and veteran status in applications to monitor and ensure equitable outcomes. Demographic data gathered from the program between 2021-2023 indicate that 21 percent of applicants identified as a person of color.

A total 6 preserved parks in Oregon, (out of the 39 preserved parks across the state; 33 that OHCS funded) have a majority of residents who identify as people of color.

The OHCS Housing Instability Dashboard uses statewide HMIS data to outline who accesses housing and retention programs. As tenants in manufactured home parks face rising lot and unit rents, historically underserved populations are the most vulnerable. These data reveal who is accessing rental assistance, shelter services, and rapid rehousing and can shed light on the burden renters of colors face, though not tell the extent of the need.



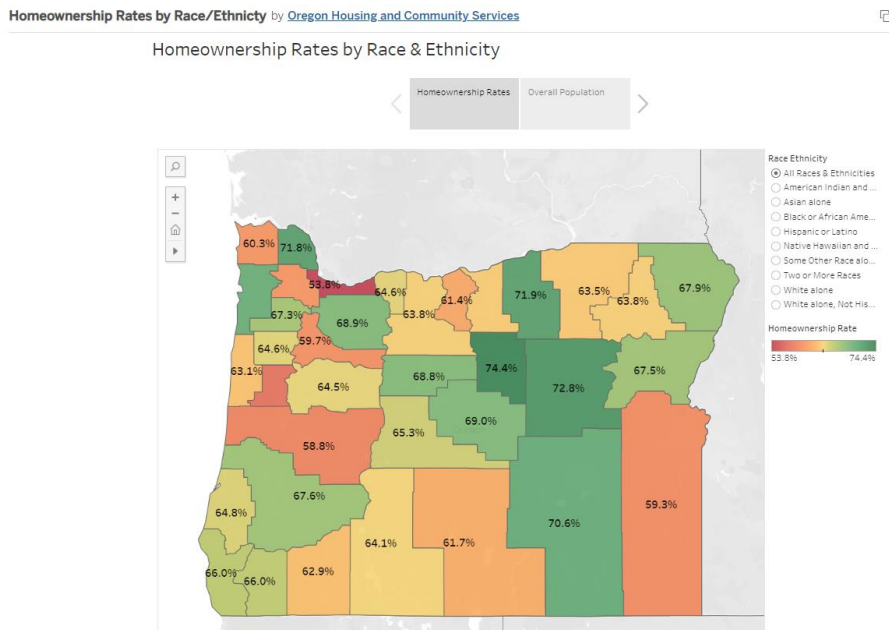
²⁰ oregon.gov/ohcs/Documents/swhp/swhp-full-plan.pdf

2. Identifying Barriers to Housing for Communities of Color

Impediments to Fair Housing Choice to uncover disparities in housing and access to opportunity and has uncovered the following impediments:

- People of color disproportionately experience barriers to attaining homeownership
- Members of protected classes disproportionately face barriers to economic opportunity
- Residents still lack knowledge of their fair housing rights, are not empowered to take action, and have very limited housing resources locally

Homeownership rates in Oregon based on race and ethnicity demonstrate a severe disproportionality.



This analysis has identified several key barriers that could hinder equitable access for communities of color. These include historical disinvestment neighborhoods and areas with significant communities of color presence, limited access to financial resources, and language and cultural barriers.

- ***OHCS Racial Equity Analysis Tool (REAT)***

The use of this customized REAT supports agency decision-makers in developing and taking actions that reduce racial inequities and put resources within reach across all regions of the state of Oregon. OHCS aims to bring considerations of racial equity meaningfully and consciously into operations, policymaking, and service delivery. Every new program implementation plan, as well as established program offerings, go through a detailed REAT review which serves to institutionalize considerations of racial equity.

- *Outreach on PRICE Draft Application*

Through community engagement efforts on the agency’s draft PRICE grant, and the utilization of the REAT process, the agency learned from Tribal partners the best way to implement its 10 percent Tribal set aside. Instead of sub-granting these funds to Tribal governments, culturally specific organizations serving this population will provide referrals from individual manufactured homeowners and residents living on Tribal lands.

3. Activities Addressing Barriers to Housing

- *Limited English Proficiency*

The OHCS Manufactured Home Replacement Program has made intentional in efforts to engage with manufactured homeowners and communities of color who may experience limited English proficiency. Program information and application materials are available in Spanish. Through OHCS analysis, the communities of color mostly highly anticipated to benefit from proposed grant activities are Latino and Tribal communities. This analysis is crucial in understanding the specific needs and disparities faced by these communities in accessing affordable housing and related services.

- *Investing in 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. Several key organizations engaging in park preservation work are culturally-specific, serving and advocating for their communities. Trusting these communities to identify their specific needs to keep residents safe from environmental hazards and to name the barriers – including financial – to address hazards is essential to that approach.

Community-based nonprofit housing developers, local housing authorities, and Tribal Nation housing entities are uniquely positioned within their communities to support placemaking and provide culturally specific and responsive housing and resident services, and General Housing Account Program (GHAP) Capacity Building Program was created to invest in the growth in culturally responsive development and regional networks towards meeting Oregon’s immediate and long-term needs for safe, stable housing.

OHCS is committed to addressing these barriers through targeted strategies. We are enhancing outreach efforts by collaborating with culturally responsive community partners, like the Oregon Human Development Corporation (a culturally specific CAA serving farmworker communities) and Coalicion Fortaleza, a culturally-specific, women of color-led, community-based organization, formed the Talent Mobile Estates resident cooperative currently in development. The Estates is the first project in which the coalition partnered with OHCS, working to rebuild the community destroyed by the 2020 Alameda wildfires.

4. Analyzing Outcomes and Effectiveness

To track our progress and evaluate effectiveness, OHCS will establish comprehensive monitoring and evaluation processes as part of its PRICE Action Plan. Staff will use data to make informed decisions, adjust strategies as needed, and ensure that our efforts are achieving measurable outcomes in advancing racial equity in housing.

- Program staff will collect disaggregated data by race and ethnicity to measure the impact of our programs on underserved communities. This will also be a requirement for all partners working with OHCS on PRICE Main activities.
- Communications staff will create an online dashboard similar to others the agency maintains for several programs. Here, race and ethnicity data, program utilized, total funding awards and other key measures will be tracked and made available to the public.
- Regular community feedback sessions will be conducted to assess effectiveness and gather input for program improvements.

Required Attachment B – Affirmative Marketing Narrative

Required Affirmative Fair Housing Marketing Plan

Oregon Housing and Community Services (OHCS) is committed to affirmatively furthering fair housing in all aspects of its operations and utilizes an Affirmative Fair Housing Marketing Plan (AFHMP) as an integral piece of that effort. The AFHMP serves as a tool to assist those who are recipients of OHCS funds and provides step-by-step instructions on how to effectively develop a property marketing plan; this is achieved by studying the market area, learning about the target population and designing methods to reach out to those who have been determined to be the least likely to apply, including communities of color, individuals with disabilities, limited English proficiency, and families with children.

OHCS requires the utilization of affirmative fair housing marketing practices in soliciting renters, determining their eligibility, and completing all transactions. All Owners/Agents must comply with the following requirements for the duration of each applicable affordability period for each property:

- **Advertising:** The Equal Housing Opportunity logo or slogan must be used in all signs, ads, brochures, and written communications. Advertising media may include, but is not limited to, local newspapers, radio, television, brochures, leaflets, bulletin boards, websites, property signs and through service providers and other housing organizations.
- **Fair Housing Poster:** Owners must display the HUD fair housing poster in all rental offices and locations where potential tenants may likely come to apply for housing.
- **Training:** Owner/Agents must maintain a nondiscriminatory hiring policy and must at least annually provide fair housing training to all employees and agents.
- **AFHMP Training:** While one person may be the responsible party for marketing efforts, all staff must be trained and be familiar with specific AFHMP requirements.
- **Translation:** In addition to the baseline requirements that the AFHMP consists of, OHCS is also requiring that project sponsors include a plan for translation of appropriate materials and property management communication with tenants in those languages identified in the AFHMP.

Affirmative Marketing PRICE Main Grant Activities

OHCS will employ a multifaceted approach to its own affirmative marketing strategies, leveraging community contacts, service providers, and culturally responsive organizations to reach target populations effectively. OHCS affirms its commitment with all partners working to administer PRICE funds throughout the state who will be required to comply with the above.

Community Action Agencies (CAAs) that serve every county throughout Oregon will develop plans to ensure repair and replacement resources are marketed broadly and effectively to diverse demographic groups, including historically underserved communities such as Black and Brown

persons, individuals with disabilities, families with children, and those with limited English proficiency.

Nonprofit entities who facilitate the financing and transition to nonprofit and resident-owned parks from private ownership will also commit to outreach and promotion strategies for park communities that include residents of these protected classes. Preserved park ownership entities will be required to comply with fair housing law in relation to both homeowners and tenants. Plans will also be required for these project types outlining how marketing will be conducted for new park tenants at turnover.

OHCS emphasizes with its partners that AFHM plans should not be created and filed away without further thought. The plan is meant to be used on a regular basis and provides a specific process that has been identified as being needed to provide equal access to the property.²¹

²¹ oregon.gov/ohcs/compliance-monitoring/Documents/memos/OHCS-AFHMP-Guide.pdf

Required Attachment C – Affirmative Furthering Fair Housing Longtime Commitment to Non-discrimination and Equal Opportunity in Housing

Oregon Housing and Community Services (OHCS) is dedicated to Affirmatively Furthering Fair Housing (AFFH) and addressing barriers to fair housing through its comprehensive PRICE Main grant proposal to ensure equitable access to safe, accessible, and affordable housing for all Oregonians, particularly those in underserved and marginalized communities.

The following measures are taken to operationalize this commitment with all funding offerings with detail on how PRICE Main activities will address barriers to fair housing.

- **Coordination with the Fair Housing Council of Oregon (FHCO)**

The agency is engaged with FHCO in a longstanding relationship working to report dimensions and outcomes of this partnership is included in OHCS' annual Fair Housing Action Plans. Together, OHCS and FHCO collaborate to identify and create strategies to address issues related to Fair Housing, including limitations on property compliance reviews, improving internal complaints process to better detect fair housing violations, and establish accountability measures. FHCO works with the Civil Rights Division (CRD) of the Oregon Bureau of Labor and Industry to enforce Fair Housing laws and to address complaints.²²

FHCO has identified significant gaps and challenges in the current processes and has encouraged OHCS to explore more effective approaches to identifying housing discrimination in state and federally subsidized properties. Following FHCO's advice, OHCS is enhancing internal processes and policies related to Fair Housing discrimination and has augmented a grant to FHCO to support their core functions: fair housing hotline, community resources, and their role as a crucial education and information hub for Fair Housing in Oregon. OHCS also hosts a webpage with FHCO and other fair housing resources, training session information, previous webinar recordings in English, Spanish, and ASL.

Through an agreement with FHCO, regular training sessions and workshops for housing providers, developers, and stakeholders on fair housing laws and best practices are held regularly.²³ These educational requirements outline nondiscrimination policies, reasonable accommodation requirements, and universal design principles to ensure that housing options are accessible to individuals with disabilities and other unique needs. These trainings aim to keep housing providers aware of their legal obligations around Fair Housing.

As with other sources of agency investment, AFFH requirements will be incorporated into both funding awards given to manufactured housing communities and partners utilizing PRICE and OHCS resources. This includes meeting requirements for Affirmative Fair Housing Marketing Plans, compliance with affordability restrictions, ADA accessibility home upgrades cost eligibility, and access to funding opportunities for protected classes.

²² oregon.gov/boli/civil-rights/pages/fair-housing

²³ oregon.gov/ohcs/compliance-monitoring/pages/training

- **Required Affirmative Fair Housing Marketing Plans (AFMHP)**

As outlined in *Required Attachment B Affirmative Marketing*, OHCS requires the utilization of affirmative fair housing marketing practices in soliciting renters, determining their eligibility, and completing all transactions. All park ownership entities receiving PRICE and OHCS funds will be required to complete AFMHPs ensuring strategies to target outreach to minority groups in their local community that are least likely to apply for housing opportunities.

- **Oregon Housing Needs Analysis: A Blueprint for Meaningful Actions**

The 2022 Oregon Housing Needs Analysis (OHNA) recommendation report found that “that the current system (in Oregon) chronically underestimates housing need, especially for lower-income households, does not enforce responsibilities of local governments to comprehensively address housing need, and perpetuates geographic patterns of racial and economic segregation, exclusion, and inequity.” To address the shortcomings of the current system, the OHNA uses a methodology that more accurately captures need for important housing types like manufactured housing and emphasizes the need for state investment in and planning for “diverse housing options the market is unlikely to produce, including manufactured housing.”

- **Ensuring Non-discrimination and Equal Opportunity for Housing through PRICE Main Activities**

OHCS’ proposed activities aim to strengthen resident protections, improve the health and safety of existing manufactured homes, invest in infrastructure upgrades throughout the state’s established manufactured dwelling parks, and replace deteriorating, unhealthy, and energy inefficient homes for homeowners. By putting state resources into these properties, OHCS is creating a relationship that allows for better monitoring of compliance to Fair Housing laws and support through the resources available both through the agency and FHCO.

The Oregon Human Development Corporation (OHDC), a culturally specific Community Action Agency, serves Oregon’s vulnerable farmworker community. When partnership agreements are formalized, OHDC will be empowered to facilitate repair grants for their clients and make referrals for replacement forgivable loans. Manufactured homes and communities on Tribal lands have access to a 10 percent program funds set aside, ensuring that Oregon’s indigenous population has equitable access to these federal and state funds.

Affordability requirements through deed restrictions for both recipients of repair and replacement grants and park preservation projects protect LMI Oregon families and provide long lasting housing stability.

ADA improvements to parks and individual homes are an explicit eligible cost within both program frameworks in OHCS’ proposal. These include, but are not limited to, ramps, grab bars, and sidewalk and park road improvements.

Through these activities, the agency ensures future owners of repaired and replaced manufactured homes, and future residents of preserved manufactured home parks, have affordability, energy efficiency, stability, and community.

Required Attachment D – Eligible Applicant

Eligible Applicant – Oregon State Government

- **Definition.** State Government shall have the same meaning as “State” in Section 102(a)(1) of the Housing and Community Development Act of 1974 (42 U.S.C. 5302): “*any State of the United States, or any instrumentality thereof approved by the Governor.*”

Oregon Housing and Community Services (OHCS) is an eligible applicant as Oregon's state Housing Finance Agency (HFA) as stipulated in Oregon Revised Statute ORS 813.112, in accordance with Section III.A of the PRICE NOFO.

As the Governor’s designated state agency responsible for housing finance for affordable housing development and federal and state-funded assistance programs in Oregon, OHCS has an extensive track record of effectively administering federal and state housing programs and initiatives, reporting, and compliance.

- **Appendix B.II PRICE CERTIFICATIONS FOR STATE APPLICANTS**

OHCS has submitted *Required Attachment G Application Certifications and Standard Forms* with Appendix B.II.

- **Active Valid Universal Entity Identifier (UEI)**

OHCS has verified its active registration in sam.gov as of July 10th, 2024.

HOUSING & COMMUNITY SERVICES, OREGON DEPARTMENT OF		● Active Registration
Unique Entity ID	CAGE/NCAGE	Expiration Date
CJUQKQXSCJ5	36UE2	Feb 27, 2025
Physical Address		Mailing Address
725 Summer ST NE STE B Salem, Oregon 97301-1266, United States		725 Summer Street NE Suite B Salem, Oregon 97301-1271, United States

- **Narrative Exhibit E – Capacity**

The agency has included information in this narrative exhibit outlining its work as Oregon’s HFA, current federal grant administration details, and key employees of the State of Oregon who will implement, manage, and report on proposed activities.

Required Attachment E – Evidence of Partnership

Evidence of Partnerships

In the State of Oregon, contracting is founded on the principle of open, and fair competition with a focus on transparency. The authority to enter into a public contract and the limits to that authority are governed primarily by state statute, state administrative rules, and to a lesser extent by the Oregon Constitution and local charters.

Detailed further in *Required Attachment H Summary of Comments*, the agency initially selected not to include detailed external partner information in the draft application because partnerships with the agency must be vetted through established processes before they can be formalized. The agency did wish to demonstrate, however, that initial planning and collaboration efforts with potential partners had occurred.

Discussions with organizations that currently work with OHCS on preservation and manufactured housing issues has enhanced the application blueprint for implementation. There is a more detailed description of these partner organizations and associated, applicable activities in the final submitted application. The additional information aims to recognize the critical contributions and impactful work that these potential partners could bring to the project, while still maintaining transparency about the preliminary nature of these engagements.

OHCS will ensure partner compliance with all PRICE-specific program requirements related to affordability as described in the NOFO.

OHCS Partner Letters

The following letters acknowledge intent, evidence of collaboration, and a tentative agreement between OHCS and the partner, assuming all state procurement and contracting processes are successfully completed. While the agency is unable to provide binding agreements at this time, capacity, desire to participate, and historic performance are at the heart of the agency's considerations for partners and are all reflected in these letters from organization leadership.

CASA of Oregon | Partner Support Letter | Partner Support Letter (pg. 56)

Community Action Partnership of Oregon (CAPO) | Partner Support Letter (pg. 57)

Network of Oregon Affordable Housing (NOAH) | Partner Support Letter (pg. 58)



June 11, 2024

Department of Housing and Urban Development

RE: PRICE Application from Oregon Housing and Community Services (OHCS)

To whom it may concern,

CASA of Oregon is a nonprofit developer of affordable housing in Oregon, and has been an active member of ROC USA, under their program to convert manufactured housing parks (MHP's) to resident ownership since 2008. To date, CASA has helped 26 resident groups convert their MHP into cooperative ownership, most of which house very low income families. And we could not have done it without Oregon Housing and Community Services (OHCS).

OHCS is Oregon's Housing Finance Agency and has been a significant partner in helping us effectively convert MHP's to resident ownership. They have a robust program of preserving MHP's as affordable, by providing funding, technical knowhow, and a willingness to adopt new programs that support this preservation effort. Not only do they have grant and tax credit funding to keep the acquisition affordable, they have extensive experience in providing funding and overseeing infrastructure improvements these parks desperately need. They have a completely established program that allows for the preservation of manufactured home parks as affordable, whether they are owned by the residents or by a local nonprofit. They are also an agency that already receives HUD funding and are familiar with the various HUD grant requirements, including the environmental review process.

While we are so appreciative of the support and work OHCS has done to preserve these parks as affordable, we are incredibly impressed that in addition to preserving the parks, OHCS has designed a replacement program that allows these low income families to replace their manufactured home with a new one, using grant and loans to do so. This demonstrates not only their capacity to run programs like PRICE, but their willingness to develop new programs that meet the needs of affordable housing in Oregon.

We fully support OHCS's application for PRICE funding and hope you see the wisdom of selecting them as a recipient. They have the infrastructure, understanding and ability to put this program into effect immediately.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read "Lisa Rogers", is written over a light blue, stylized background element.

Lisa Rogers
Deputy Director



FR-6700-N-99 | Partner Letters

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June 24, 2024

Oregon Dept. of Housing & Community Services
Manufactured Housing Department
725 Summer Street, Suite B
Salem, OR 97301

RE: Letter of Support for OHCS PRICE Grant Application

I am writing to express the Community Action Partnership of Oregon's strong support for Oregon's Department of Housing and Community Services' application for the Housing and Urban Development Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Grant. The CAPO Partnership represents 17 Community Action Agencies (CAAs) in Oregon that currently work with owners of manufactured homes seeking repairs for their older, and often unsafe and unhealthy manufactured homes. Nearly 300,000 Oregonians reside in a manufactured home. The majority of these were built prior to 1995, and therefore are in a state of disrepair. Currently, Community Action Agencies do not have funds available to complete basic repairs on these homes, and many homeowners are forced to abandon their manufactured homes because they become uninhabitable. The PRICE grant funds would allow CAAs to provide needed rehabilitation to manufactured homes, keeping residents safely housed. In addition, CAAs are often not able to complete weatherization repairs and improvements that are funded by other grants because a basic repair is needed first, and these repairs are not covered. Repairing and rehabilitating these homes keeps individuals and families from homelessness and allows us to maintain a critical stock of affordable housing in our communities during a severe housing shortage and a time of rapidly escalating rents in Oregon.

CAPO is excited about this opportunity to partner with OHCS through the PRICE Repair and Rehabilitation Grant. This work is critical to meeting Oregon's goals in reducing homelessness and meeting the state's low-income housing needs. We are confident our work together can serve as a model for other states implementing similar programs.

Sincerely,

Janet Allanach,
Executive Director, Community Action Partnership of Oregon



June 25, 2024

Andrea Bell, Executive Director
Oregon Housing and Community Services
725 Summer Street NE, Suite B
Salem, OR 97301-1266

Dear Director Bell,

Network for Oregon Affordable Housing (NOAH) is a statewide nonprofit and Community Development Financial Institution providing financing for affordable housing throughout the state with over \$350 million of lending capital available. Since 2008, NOAH has provided financing for manufactured housing communities owned by mission-focused nonprofits, resident-owned cooperatives, or housing authorities. To date we have provided 22 permanent loans helping to preserve affordability of 1,321 home spaces, and seven acquisition loans, stabilizing 664 spaces and helping to secure the long-term affordability of these communities.

In addition to providing financing for preservation of manufactured housing communities, NOAH is keenly focused on manufactured housing policy, both in Oregon and nationally. For years we have worked closely with a network of committed organizations to facilitate preservation of manufactured housing communities and have worked closely with the Oregon legislature to advance bills that promote manufactured housing. Working collaboratively, these organizations have helped secure tens of millions of dollars from the Oregon legislature to support manufactured housing community preservation transactions.

I am writing to express NOAH's strong support for the Oregon Housing and Community Services (OHCS) application under the Preservation and Reinvestment Initiative for Community Enhancement (PRICE) grant Notice of Funding Opportunity. OHCS's thoughtful and collaborative approach takes advantage of their existing programs and leverages the capacity of the organizations working in Oregon today to preserve existing manufactured housing communities.

We appreciate the Department's plan to utilize existing and highly successful manufactured housing preservation and home repair/replacement programs. By taking this approach, OHCS will be able to deploy PRICE funds very quickly to impact at-risk manufactured housing communities and homeowners across the state, without the need to create and stand-up new programs.

The greatest strength of the OHCS PRICE application is that it utilizes the capacity and broad experience of partners currently working in Oregon's manufactured housing sector. These partners include OHCS itself; NOAH, a lender and policy leader; CASA of Oregon, a manufactured community preservation developer, resident coop organizer and TA provider; St Vincent dePaul of Lane County (SVdP), a nonprofit owner of eight communities, specializing in acquiring and turning around troubled communities; and SVdP's related entity, Hope Community Corporation, which operates a new manufactured housing factory in Eugene, Oregon, building low cost, durable and resilient homes.

For the reasons stated, we urge HUD to fund the OHCS PRICE application as proposed. Please feel free to contact me with any questions about NOAH's endorsement.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ann Remmers", with a long horizontal line extending to the right.

Ann Remmers
Acting Executive Director
Network for Oregon Affordable Housing