

## **DRAFT RESPONSE**

### ***Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Competition HUD Notice of Funding Opportunity***

**Enterprise Community Partners, Inc. and NYS Housing and Community Renewal**

**May 13<sup>th</sup>, 2024**

#### **Exhibit A - Executive Summary**

Manufactured housing provides a safe and reliable housing options for many low-income families across the United States, but it has traditionally been disconnected from the robust array of tools developed for the affordable housing sector. Enterprise and HCR propose to leverage PRICE funding to knit the two sectors and poise manufactured housing communities to take advantage of the resources available to traditional affordable housing.

We hope to demonstrate that a comprehensive approach to strengthening MHCs will be transformative in allowing local community stakeholders to re-envision the value of MHCs and to stabilize a key affordable housing option for low- and moderate-income New Yorkers. Our goal is to position MHCs as a long-term, healthy, and sustainable option for low- and moderate-income income New York residents and to build out pathways for affordable housing stakeholders to proactively incorporate MHCs into their strategies.

Our proposed plan

- Provides an affordable financing option for 500 residents to purchase their homes by reducing mortgage principal on manufactured home loans through the Manufactured Home Mortgage Program.
- Ensures that approximately 800 residents receive the legal support they need to retain those homes by funding non-profit legal services to protect the rights of MH residents through individual representation, classes of residents within MHCs, or multiple MHCs owned by common owners.
- Improves MHC infrastructure and climate resiliency for 10 MHCs.
- Ensures that 1,500 households residing in MHCs have safe, accessible and quality homes through repairs and upgrades in order to successfully age in place, access their homes, or to be positioned to take advantage of energy retrofits such as the Weatherization Assistance Program (WAP), state and federal solar incentives, and or other climate resiliency efforts.
- Readies 10 MHCs for acquisition by mission-oriented owners or resident owned cooperatives by funding affordable housing non-profits to undertake early feasibility and predevelopment activities.

- Empowers 5 regional non-profits to proactively engage with MHCs in their communities and coordinate the activities above.
- Provides a pathway and demonstrates a set of strategies to preserve New York State's 1,811 MHCs in the future.

We want to ensure that not only are manufactured homes an affordable option, but they are also a safe and desirable one in a quality community.

### **Exhibit B - Threshold Requirements**

Enterprise Community Partners (Enterprise) meets all threshold requirements. Enterprise

- (1) does not have any unresolved civil rights matters
- (2) will submit the application on time
- (3) is an eligible applicant as a 501(c)3 non-profit entity
- (4) only submitting one application as an eligible applicant

Enterprise meets all Other Submission Requirements for this application.

## **Exhibit C – Need**

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

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

Manufactured Housing Communities (MHCs) provide a vital source of affordable housing to low- and moderate-income residents in New York State, but they are often unstable options for vulnerable households because (1) traditional MH mortgages are expensive and risky, (2) MHC owners do not consistently follow state tenant protection requirements, and (3) the underlying infrastructure of the lots or the individual homes can need significant upgrades. Traditional affordable housing owners who may be in a position to acquire MHCs find undertaking thorough feasibility assessments to be expensive and risky.

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

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

New York State's 192,890 MH units represent 2.4% of the state's total housing stock. Of these, some 100,802 units (10.3%) are in rural and small-town areas, which is 10.3% of the 737,313 units in rural and small-town areas. Over a third of MHs in New York (68,933 units) are in 1,811 Manufactured Housing Communities (MCHs), which are in 42 of New York's 62 counties.

MHCs serve a predominantly low income population. Median household income for residents of manufactured housing (not exclusive to those living in MHCs) in New York State in 2022 was \$43,500, which is approximately 46% of New York State HUD AMI for a family of three. In comparison, medium income for all households across the state totaled \$75,910 in that year. Manufactured housing also serves a significant number of seniors: 36.4% of manufactured homes in New York State had a senior in the household.

Unfortunately, the number of MHCs across New York has declined by 12% since 1989 as market forces and lack of support from local government jurisdictions are continuing to put pressure on the preservation of MHCs.

Meanwhile, housing is a significant need throughout the State. As of 2022, New York had nearly 3 million cost-burdened households, making up 38.9 percent of the state's households. While

New York is ranked third in the nation for cost-burdened households, it ranked 32nd for growth in housing units.

As of 2022, 52.4 percent of New York renters were cost-burdened. Of them, 73 percent (roughly 1.3 million) had household income of less than \$50,000. Between 2012 and 2022, gross median monthly rent increased by nearly 39 percent. 9 in 10 renter households with incomes below \$35,000 experienced a cost burden. 28 percent of New York homeowners were cost-burdened. Between 2012 and 2022, monthly median homeowner costs increased by 28 percent. Renters in manufactured housing had a median income of \$40,000 in 2022 while in that same year homeowners in manufactured housing had a median household income of \$45,100, not significantly higher.

86.2 percent of residents living in manufactured housing identify as white. In comparison, the portion of residents in the 57 counties in New York State outside New York City who identify as white totals 69.4%. The next most prevalent racial demographic residing in manufactured housing identify as Hispanic in the Census, at 5.5%.

Over the past 5 years, New York State increased legal protections against unreasonable pad rent increases and, in partnership with Enterprise, the New York State Division of Housing and Community Renewal, launched several funding programs to improve access to MH homeownership, fund acquisition and preservation of parks, and improve resilience of infrastructure around parks and within homes. However, these initiatives are not sufficient to protect MHC residents, provide incentives for tenant-run cooperatives or mission-based owners to purchase communities, or improve housing or communities at scale.

### **(1) Need for Improved Access and Affordability for New York's low- and moderate-income residents**

New York residents need opportunities to acquire and retain safe and stable housing. MHCs across the region provide these opportunities. However, issues with financing and tenant protections often preclude residents from becoming owners of manufactured homes or remaining in their homes as either homeowners or renters.

#### Affordable mortgages.

New York State Mortgage Agency's (SONYMA) recently launched an innovative Manufactured Home Loan product that will provide thousands of interested homebuyers with access to affordable financing to purchase manufactured homes. This funding will deepen the ability of the product to serve low-income homeowners by lowering costs and risks.

According to the Consumer Financial Protection Bureau report published in 2021, 42% of all manufactured home financing nationally is made up of "chattel" loans. The traditional "chattel loans" typically impose shorter terms and interest rates approximately 1.5% higher than traditional home loans, with fewer consumer protections. They are offered by a handful of chattel lenders who are increasingly non-bank entities. This lack of an affordable, safe mortgage option puts already vulnerable low-income homeowners at significant financial risk – median household

income for homeowners living in manufactured housing in New York State in 2022 was only \$45,100.

SONYMA is working with a small group of responsible lenders to insure a chattel product that includes low loan fees, a 30-day interest rate lock, lower interest rates than what the market offers, a robust loss mitigation policy to support defaulted borrowers, and 30-year loan terms. However, with current market interest rates averaging 7%, total monthly costs remain out of reach for many MHC households.

### Tenant Protections.

New York State law provides significant protections for MHC residents, including limitations on lot rent increases and structures around rent-to-own agreements. However, there is significant anecdotal evidence that owners continue to raise lot rents beyond legal maximums and otherwise set up conditions that increase resident housing instability. Non-profit legal services in the state serve hundreds of MHC residents each year and see demand for hundreds more, both for individual residents and for entire MHCs or classes of MHCs with a common owner. We believe that a concentrated effort to provide legal representation to MHC residents can serve to change landlord expectations and habits, and outreach can help more MHC residents understand their rights and the potential solutions when their rights have been violated.

### **(2) Need for Improved Financial and Environmental Stability of MHCs**

Many of New York State's 1,811 MHCs are in significant need of infrastructure upgrades, both to the parks and to individual homes. It is also abundantly clear that there is no single, one-size-fits-all solution to improving MHC infrastructure. In some cases, parks under responsible ownership could benefit from upgrades to infrastructure to continue viability. In other cases, the underlying park infrastructure is acceptable, but individual homes need repairs, weatherization improvements, or aging-in-place upgrades. Sometimes a change of ownership to either a resident-owned cooperative or to oversight by a mission-focused owner is necessary to ensure long term sustainability. We expect heightened interest in MHC acquisitions in New York State with the passage of a revamped Right of First Refusal for MHCs - through PRICE resources, we would like to equip park residents and mission-oriented owners with the tools to make the spirit of the law successful.

### Predevelopment

A new Right of First Refusal requires MHC owners to provide 140 days notice to tenants prior to the sale of a community. As MHCs come on the market, however, neither residents nor local non-profits have the tools, funding, or staffing to quickly dive into the community's physical needs or financial situation, let alone set up a financing and acquisition strategy to bid on the site. To undertake this important predevelopment work, an entity or group of residents must dedicate significant staff time and fund an array of engineering and appraisal reports. These costs might not be compensated at all if an acquisition is ultimately not achieved or, even if an acquisition is successful, might only be reimbursed after many years of work. Most MHC residents and

mission-oriented non-profit affordable housing operators do not have the funds to float these costs for several years.

### Infrastructure

In 2023, the New York State Department of Health identified 148 critical health violations in New York State's MHC infrastructure. In addition to these immediately hazardous violations, many MHCs throughout the state are located in floodplains or in communities with a vulnerable power grid and therefore vulnerable to extreme heat events. Responsible MHC owners and resident-owned cooperatives rarely have the funds and technical expertise to upgrade their community's underlying infrastructure or to position it for climate resiliency.

### Home repair

While residents of manufactured homes tend to have low incomes – with a median household income of \$43,500 in 2022, their energy costs per square foot are roughly 50% higher on average than those in site-built single-family homes. This significant energy expenditure does not align with better comfort and safety: people living in manufactured homes are six to eight times more likely to die of heat-related deaths than residents of other homes. New York State has a robust Weatherization Assistance Program (WAP), and a number of other energy efficiency and clean energy programs that have recently received additional influxes of funding, but many MHs, even those built after the 1994 standards, are in too poor a condition to take advantage of these opportunities. For example, neither basic insulation nor a solar panel can be installed in a home with a leaking roof. Additionally, accessibility for residents with disabilities is also a significant barrier in manufactured homes; 11 percent of MH households had a disabled resident in 2022. 36.4 percent of MHs were home to seniors, but most MHs have not been upgraded for basic aging-in-place components.

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

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

Enterprise will undertake the proposed work statewide, which includes communities that meet Distress Criteria. In the interest of AFFH, we will also work in communities of opportunity where the preservation and access to MHCs is particularly vital for low- and moderate-income residents who would otherwise not have access to other housing options.

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

**All Applicants:** Is the area in or inclusive of a census tract identified as a Community Disaster Resilience Zone, as defined by FEMA? If so, what future risks do the communities served by your proposal face due to natural hazards, extreme weather, and disasters such as flooding, wildfires, heat, severe storms, etc.?

Enterprise will undertake the proposed work statewide but will prioritize MHCs vulnerable to climate risk for our infrastructure and resiliency upgrade funding. For individual home repairs in communities located on a floodplain, we will include localized resiliency measures such as elevating the pad or moving mechanical systems.

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

**PRICE Main:** Barriers may include land use controls, insufficient infrastructure, insufficient access to materials and shipping logistics for remote and rural areas, permitting procedures and fees, perceived poor quality, low financing availability to purchase units and/or lots, local or political opposition to manufactured housing, low resident organizing or self-governance capacity, and high land values prohibitive for purchase by LMI households wishing to site a manufactured home. For non-Tribal Applicants, describe the protected class groups in your project area that lack access to safe and healthy affordable housing and the barriers to AFFH that create a lack of opportunity for them. Barriers may include existing patterns of segregation in the community, lack of opportunity in racially or ethnically concentrated areas of poverty, and discrimination. Note: you will describe how you plan to address these barriers in the required AFFH narrative in Section III. F. of this NOFO.

Without access to a tailored mortgage product, purchase of manufactured homes imposes high ongoing costs for low-income households. Additionally, homes in poor physical condition lead to high operating and utility expenses, further straining a vulnerable population, particularly for seniors and residents with disabilities. While New York State has considerable protections on lot rent increases, adherence to the law is inconsistent. Both factors are barriers to AFFH as they put more vulnerable households – by race, disability, and age – at risk of housing instability.

Purchase of MHCs by resident-owned cooperatives or mission-oriented owners has been limited due to the significant time and financial outlay needed for responsible potential owners to assess physical and financial infrastructure, develop a strategy, and obtain low-cost financing. MHCs are complex and to fully understand the needs of each, one requires significant engineering and legal analysis as well as thoughtful resident engagement. In some communities, market pressures lead to the loss of MHCs as other uses command higher acquisition prices; conversion of MHCs to a different use are a significant barrier to AFFH as loss of MHCs are more likely in communities of opportunity.

MHCs are viewed negatively by many neighbors and local leaders, in part because long histories of poor operations have predisposed community members to associate MHCs with blight. This lack of support leads to limitations in access to crucial infrastructure funding, with housing for protected classes – by race, disability status, and age – most at risk.

Demographics of MHC residents vary widely across the state. With the affordable mortgage product, we will be able to serve a lower income and more racially diverse population than traditionally has had access to homeownership; with the legal support we will be able to help residents fight cases of discrimination; with the community-wide infrastructure and home repair funding, we will be able to ensure that seniors or residents with disabilities can stay in their homes, and by setting up the systems to ensure that more MHCs are under responsible,

responsive ownership, we can move the dial on MHCs becoming a stable, quality housing choice for low and moderate income New Yorkers.

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## **Exhibit D – Soundness of Approach**

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

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

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

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

Enterprise and HCR are proposing to leverage the traditional affordable housing infrastructure to strengthen the ability of MHCs to provide stable, quality housing benefiting low- and moderate-income persons across New York State along two intersecting domains:

- (1) Improving access and affordability to New York's low- and moderate-income MHC residents; and
- (2) Improving the financial and environmental sustainability of MHCs

Our goal is to position MHCs as a long-term, healthy, and sustainable option for low- and moderate-income New York residents.

Our proposed plan

- Provides an affordable financing option for residents to purchase their homes
- Ensures that residents receive the legal support they need to retain those homes
- Improves MHC infrastructure and climate resiliency.
- Ensures that residents of MHCs have safe, accessible and quality homes that are positioned to take advantage of energy programs and help their residents age in place
- Readies communities for acquisition by mission-oriented owners or resident owned cooperatives
- Empowers regional non-profits to proactively engage with MHCs

We want to ensure that not only are manufactured homes an affordable option, but they are also a safe and desirable one in a quality community.

We hope to share our lessons learned through a combination of blog posts, white papers, trainings, and conferences.

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

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

**Housing Affordability**

Enterprise and HCR believe that a robust MHC ecosystem should provide residents opportunities to acquire and retain safe and stable housing. First, we will provide a mechanism for purchasers of manufactured homes to obtain mortgages at terms that more closely resemble those of real estate loans than traditional chattel loans. Second, we will ensure that the robust tenant protection laws in place for residents of New York’s manufactured housing parks are adhered to by providing legal support and education. The legal services providers will conduct outreach and provide basic education to ensure that MHC residents understand their rights.

***Activity 1. Reduce Mortgage Principal on Manufactured Home Loans***

In 2023, HCR launched the Manufactured Home Mortgage Program, which allows purchasers of manufactured homes to obtain mortgages at terms more closely aligned with that of real estate lending than with traditional chattel loans through insurance by the State of New York Mortgage Agency (SONYMA).

Currently the financing available to homebuyers who want to site their Manufactured Home on leased land (MH Parks) is limited to costly and often predatory loan products, including retail installment contracts, and private chattel loans. The current chattel loan market is known for charging very high interest rates, particularly to borrowers with low credit scores. HCR has seen some chattel loans carrying interest rates above 10%.

Under the new SONYMA Manufactured Home Loan Program, borrowers will have access to financing that will be almost identical to SONYMA affordable mortgage products with interest rates typically averaging less than 7%. PRICE funding of \$30,000 per borrower will allow SONYMA to offer closing cost assistance, principal reduction, and possible interest rate buy-downs that will make these loans even more affordable to 500 MH buyers.

While the monthly savings for SONYMA MH borrowers will vary based on loan size, we estimate the average annual savings with PRICE funding will average at about \$1800 per year, expanding the product availability to a lower income population.

Participating owners must have incomes below 80% AMI and remain in the property for 10 years or sell their property to another household at or below 80 of AMI at a price affordable to a household at 80% AMI. Owners selling the homes to an over-income household before the 10-year restriction are liable for recapture of a portion of the principal reduction to SONYMA.

Ultimately, a \$30,000 PRICE contribution will save homeowners \$56,000 over the course of a 30-year mortgage.

Enterprise will subgrant the funds to the 3 lenders who are positioned to finance SONYMA Manufactured Home Loans. We will enter into grant agreements with each lender in the first quarter of the workplan and fund the lenders in quarterly increments as they identify homeowner pipeline. Periods of performance will be open for five years until funds run out and 500 borrowers are supported.

### ***Activity 2. Provide Legal Services***

While New York State law provides significant protections for MHC residents, including limitations on lot rent increases and structures around rent-to-own agreements, there is significant anecdotal evidence that owners continue to raise lot rents beyond legal maximums and otherwise set up conditions for resident housing instability. Legal representation is needed for individual residents and cohorts of residents who live in the same community and represent a single case.

We propose to fund up to three non-profit legal services organizations for three years at \$200,000 per year to protect the rights of MH residents through both individual representation and as classes of residents within entire MHCs or multiple MHCs operated by common owners. We will issue an RFP for legal services providers in the first quarter of the workplan and will determine awards based on respondents' proposed strategies to:

- Scale legal efforts and stabilize housing for the greatest number of residents
- Outreach for residents to understand their rights
- Quickly hire on the appropriate staff in our current labor shortage

We estimate that these funds will provide legal representation to over 800 MHC residents from both individual and park-wide cases. We expect that several thousand additional households will benefit from enhanced outreach on MHC resident rights.

### **Improving Infrastructure and homes**

There is no single one-size-fits all solution to preserving the State's existing MHCs. We propose a multi-pronged solution to build capacity to assess needs and develop tailored strategies to improve MHCs and individual homes and to position communities for acquisition by resident cooperatives or mission-oriented owners.

### ***Activity 3. Engage Non-Profits as Ombudsmen***

In order to tailor solutions to the specific needs of individual parks, we propose engaging non-profit affordable housing operators from 5 different regions to dedicate staff as MHC ombudsmen, assessing the MHCs in their communities and coordinating the activities laid out at the bottom of this section – they will help identify MHCs in need of infrastructure or resiliency upgrades, of clusters of homes in need of repair, and of MHCs prime for acquisition by resident cooperatives or mission-oriented owners. Ombudsmen will be encouraged to assess the feasibility of MHC acquisition by their own organizations. We believe that active participation by local housing non-profits is key to strengthening MHCs. By integrating the affordable

housing and manufactured housing communities, local non-profits can bring their expertise to support the preservation of long term affordability within MHCs, a source of housing that has traditionally not been part of our sector.

In the first quarter of the workplan, Enterprise will issue an RFP for ombudsmen in regions around New York State. Ombudsmen will be selected based on geographic reach, staff expertise in real estate operations and development, organizational experience with MHCs, and a realistic plan to hire knowledgeable staff. Ombudsmen organizations will each be funded \$150,000 per year for three years for staff costs and will be required to deliver on minimum outputs on the activities below.

#### ***Activity 4. Improve Infrastructure and Resiliency***

PRICE funding will allow MHCs throughout the State to assess the need for and undertake infrastructure improvements. MHCs with immediate health and safety needs as well as those in floodplains will be prioritized, and all MHCs receiving these funds will enter into a 15-year regulatory agreement to keep lot rents affordable to households at or below 80% of AMI.

We plan to invest \$9,750,000 to support infrastructure improvements for approximately 10 MHCs. The estimate also includes assessment costs for up to 3 additional parks that do not ultimately undertake improvements. Funding will be available on a rolling basis for a period of five years as MHCs in need of upgrades are identified. MHCs with demonstrated climate risks or with a recent history of infrastructure failures will be prioritized.

Enterprise and HCR will first develop written parameters about eligibility and scopes of work. We will reach out directly to MHCs about the availability of infrastructure and resiliency funds and ensure that local health departments and county governments are aware of these resources. We will also ask ombudsmen to identify potential MHCs and to provide technical assistance in undertaking the assessments and coordinating the improvements. Infrastructure scopes will be approved by the ombudsmen, HCR, and, as applicable, the NYS Department of Health. Resiliency improvements will be in part informed by resources developed by Enterprise and found on our Climate Hub website: <https://www.enterprisecommunity.org/decarb-hub>. Enterprise will provide technical assistance on Davis Bacon, environmental review, and other Federal requirements.

#### ***Activity 5: Repair Individual Homes and Improve Energy Efficiency***

PRICE funding will upgrade approximately 1,500 manufactured homes that are otherwise not in sufficiently stable condition to take advantage of the Weatherization Assistance Program (WAP), state and federal solar incentives, or other climate resiliency efforts without such repairs as well as homes with disabled and senior residents in need of accessibility and/or aging-in-place upgrades. Repairs would only happen in homes built after 1994 and that can be made code compliant. Homes with disabled or senior residents will be prioritized and, in those cases, aging-in-place and/or accessibility upgrades would be included in the scope. We estimate that PRICE funding could provide repairs for approximately 1,500 homes over five years, for a total investment of \$22,500,000. These funds would leverage approximately \$15 million in WAP and other funding. Repairs would be limited to homes with low- and moderate-income residents and

would require a five-year affordability restriction. In the case of projects funneling into WAP, those services will be limited to residents earning 60% or less of the State AMI.

Ombudsmen will work with local MHCs to identify homes in need of upgrades and with WAP providers to identify homes that need upgrades to qualify for WAP. For those projects funneling into WAP, Enterprise will fund WAP providers to undertake the additional repair work. For simple aging in place projects or those funneling into other energy efficiency or clean energy programs, the ombudsmen will help homeowners engage contractors to undertake the repairs.

In the first and second quarters of the work plan, Enterprise will convene the ombudsmen, WAP providers, HCR, and code enforcement officers around the State to develop a set of protocols to govern the repair scopes. In the third quarter of the work plan and the third quarter of every year thereafter until the end of the work plan, Enterprise will open the program for funding proposals to WAP providers that have identified pre-WAP repair portfolio and for ombudsmen that have identified repair portfolio for aging in place and disability upgrades as well as those homes in need of repairs in advance of another energy program. We will encourage WAP providers and ombudsmen to bundle multiple homes in each proposal in order to take advantage of scale and will provide technical assistance on Davis Bacon, environmental review, and other Federal requirements.

#### ***Activity 6. Fund Predevelopment for Ownership Transfer***

Enterprise will fund affordable housing non-profits to undertake early feasibility and predevelopment activities for potential acquisition of MHCs by resident-owned cooperatives or a mission-focused owner, potentially the ombudsmen themselves if circumstances permit. We expect significant interest in this work, with a newly enhanced Right of First Refusal law allowing residents 140 days to make an offer on an MHC on the market and are excited to deploy PRICE funding to help MHC residents and mission-based owners take advantage of the spirit of this new law. Funding can be used for engineering, appraisal, and legal reports, resident engagement, and for staff or consultant time to develop a financing strategy. PRICE funds will fund approximately \$300,000 in predevelopment costs for each of 10 MHCs. Acquisitions will ultimately be supported through HCR's Manufactured Home Advantage Program (MHAP), which limits incomes of incoming residents to 80% of AMI for a period of at least 15 years; we expect the predevelopment investment to leverage approximately \$18,000,000.00 in MHAP funds.

Funding will be available on a rolling basis for a period of five years as organizations identify potential MHCs and upon approval from HCR after an initial desk review of the likelihood of the MHC acquisition. Priority will go to sites at risk of conversion located in communities of opportunity to further our AFFH goals.

Through our dual pillars of access and affordability and preservation, we will open up low-cost mortgage options and provide legal support for MHC residents, fund infrastructure, accessibility and climate resilience upgrades in existing MHCs and individual homes, and position MHCs to thrive through responsible ownership.



**What is your budget?**

All Applicants: Include all funding amounts and sources, how the funding will be provided, and how your project will be supported and sustained by the funding. Include the funding you are requesting from PRICE.

Sub-Grantees	Quantity	Unit Cost	Estimated Cost
CHATEL LENDERS	3.00	\$5,000,000	\$15,000,000
RESILIENCE/INFRASTRUCTURE IMPROVEMENTS	13.00	\$750,000	\$9,750,000
INDIVIDUAL HOME REPAIRS (\$ per contractor team)	8.00	\$2,812,500	\$22,500,000
LEGAL SERVICES	3.00	\$600,000	\$1,800,000
PREDEVELOPMENT SUPPORT	10.00	\$300,000	\$3,000,000
REGIONAL OMBUDSMEN	5.00	\$450,000	\$2,250,000
CDBG COMPLIANCE CONTRACTOR	1.00	\$100,000	\$100,000
Total Contracts and Sub-Grantees Cost			\$54,400,000
ENTERPRISE PROGRAM ADMINISTRATION, TRAVEL, OTHER			\$1,829,342
<b>Total Estimated Costs</b>			<b>\$56,229,342</b>

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

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

PRICE funding will:

- Provide 500 low income households who would otherwise have been locked out of homeownership with opportunities to purchase homes
- Stabilize housing for approximately 800 MH households in need of legal support
- Repair and upgrade 1,500 homes, improving accessibility, aging-in-place, and positioning them to leverage energy programs
- Improve infrastructure and resilience for 10 MHCs
- Preserve 10 MHCs for long term affordability

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

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

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

Enterprise and HCR believe that it is possible to provide a platform for wealth building through homeownership while ensuring long term affordability. The affordability restrictions placed on

the Manufactured Home Loan product and MHAP financing that the predevelopment activities will facilitate, incorporate a reasonable annual increase while limiting any excessive market pricing that will price out low- and moderate-income households in generations to come.

The Manufactured Home Loan product will allow low-income residents to participate in the wealth building opportunities of homeownership that have traditionally been closed to them. The product will be limited to homebuyers at or below 80% of AMI and resale will be limited to households at or below 80% of AMI for a period of 10 years.

The MHAP acquisitions that the predevelopment efforts will establish at least 15 years of affordability for lot rents and restrictions on incomes of new residents. Restricting homeowner incomes to 120% AMI for 15 years can provide significant opportunities for homeowners to realize a profit and build wealth if they choose to sell; between 2014 and 2024, AMIs increased by 50% in Seneca County and 78% in Ulster County – a concurrent increase in home price will allow a community to retain affordable homebuying opportunities while providing a return to the homeowner. Rentals will be limited to households at or under 80% of AMI, with rents on the units not exceeding 30% of 80% of AMI. Lot rents shall not exceed 40% of FMR for a two-bedroom unit.

Infrastructure funding restrictions will follow those of MHAP.

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

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

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

With a median household income of \$43,500, the average MH resident cannot afford the New York State median gross rent of \$1,507 or afford the median price of a home in 2022 of \$384,100. Boosting the Manufactured Home Loan product with PRICE funding will deepen the affordability of this innovative program and make homeownership accessible to low-income MHC residents who had traditionally been locked out of the home mortgage system that homeowners of site-built housing have long taken for granted. Providing home repairs at scale as well as improved infrastructure will improve the health, safety, ongoing affordability, and accessibility of homes for low-income residents, including a more racially diverse group of New Yorkers and households with seniors and/or with residents with disabilities. Finally, the MHAP program ensures long term affordability of not just homes but of pad rent.



Enterprise and HCR will provide training to our subgrantees on Section 3 and will provide technical assistance to them on outreach, engagement, and ongoing support of a diverse workforce execute the PRICE work.

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

**What significant hazards could impact your project site(s)? All Applicants:** For each significant hazard, describe hazard mitigation activities you will undertake to enhance the resilience of manufactured homes or associated infrastructure. You may wish to consult the Federal Emergency Management Agency (FEMA) National Risk Index, Hazus Program, Resilience Analysis and Planning Tool, and Community Disaster Resilience Zone Platform Tools. Additional resources may be found in FEMA's Recovery and Resilience Resource Library.

This program will be executed statewide, touching MHCs in a variety of locations. Hazard issues common to MHCs are flooding and extreme heat hazards. MHCs in 100-year and 500-year flood zones will be prioritized for infrastructure improvement funding and resilience upgrades will be informed in part with the resources that Enterprise developed and posted on our Climate Hub website: Climate Risk Reduction Resources.

For the infrastructure improvement work, the home repair work, and the predevelopment work, Enterprise will work with stakeholders to maximize uptake of federal and private resources flowing down to states for climate resiliency, energy efficiency, and clean energy.

Enterprise will focus primarily on mitigation of and adaptation to flood risks and extreme heat events.

For flooding risks in MHCs, Enterprise will encourage strategies such as:

- Stormwater drainage improvements
- Improvements to local pump station(s) (if on municipal sewer) including storm hardening, backup generator installation, etc. to limit bypass of raw or partially treated sewage into local waterways and reduce risk of contamination of local drinking water
- Improvement to, or extension of, municipal sewer in lieu of individual septic systems
- Improvement to, or extension of, water infrastructure to ensure continued availability of potable water to residents during extreme storm event
- Separation of combined sewer piping into independent storm and sanitary sewer pipes
- Road raising for access by emergency services &/or as evacuation routes
- Streambank restoration or diversion
- Bulkhead repair/installation
- Development/expansion of living shoreline to reduce flooding and shoreline damage
- Culvert cleanout, replacement, &/or rightsizing
- Leveraging preexisting or new construction of Flood Control Areas
- Creation of green infrastructure such as swales and drainage retention ponds
- Replacement of impervious services with plantings/pervious pavers

- Stream gauge installation for the monitoring of water levels to operate dam gate in local facility to manage release of water
- Elevation of utilities.

For extreme heat adaptation, MHC-wide measures could include:

- Outdoor evaporative cooling (mistifiers)
- Cool pavements – cool pavement coating on roads, sidewalks, parking areas to reduce temperature
- Green/living walls – vertical forms of vegetation
- Tree plantings – provides shade and potentially evaporative cooling
- Replace pavement/asphalt with soil and plants
- Develop an early detection warning system for heat

MHCs that have experienced multiple hazard events or are particularly vulnerable may also receive funding to build pop-up shelters and/or solar-powered cooling centers.

Individual home repairs will focus on readying a home for WAP, whose energy efficiency measures are key to withstanding extreme heat and, to some extent, excessive rainfall. In locations with significant weather risks, we will incorporate pad and mechanical elevation within individual homes whenever possible.

All MHCs touched by this PRICE funding will receive materials related to disaster preparedness and will be able to receive support on resiliency from Enterprise's Building Resilient Futures team.

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

**All Applicants (except Tribal Applicants):** Describe in detail how your proposed activities will advance Environmental Justice in one or more of the activities below. You may wish to consult the Climate and Economic Resilience Screening Tool for examples of environmental justice factors and economic indicators, such as energy, health, legacy pollution, water/waste water, and projected risk of floods or wildfires. For this competition, activities that advance Environmental Justice for people or communities that have been environmentally underserved or overburdened (e.g., low-income, and Black and Brown communities) are listed below:

- Reducing or mitigating exposure to environmental and health hazards (e.g., poor air quality, legacy pollution, heat islands, and soil contamination from current/former industrial areas).
- Improving protection from and resilience to environmental harms (e.g., weatherization, tornado shelters, fire-resistant materials, floodproofing).
- Expanding environmental benefits (e.g., clean air and water, public transportation, bike and walking paths, clean energy, green technology, biodiversity).
- Overcoming prior disinvestment in environmental infrastructure (e.g., drainage systems, green spaces, pollution controls).

PRICE funding will protect low-income MHC residents in New York from environmental harms by improving infrastructure in communities as well as in individual homes. Improvements will focus on mitigation and adaptation focusing on flooding and extreme heat events.

Throughout New York State, there has been a grave disinvestment in the infrastructure of MHCs. Many have outdated water and sewer systems, roads, electric grid connections, and other infrastructure. Homes are vulnerable to extreme heat and residents pay approximately 50% more in utility costs than do residents of site-built homes. Enterprise hopes to remedy this situation by improving the infrastructure and resiliency measures of MHCs and to position individual homes for weatherization and, whenever possible, to take advantage of resiliency measures such as elevation of mechanical systems and installation of solar panels.

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

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

Enterprise will convene a stakeholder group comprised of MHC residents, owners, advocates, affordable housing developers, HCR, and interested local and county government representatives on a quarterly basis. The quarterly meeting will be held on Zoom and while a core group of participants will be established in the first quarter of the work plan, it will be open to new participants as more MHCs are engaged in PRICE-funded programs. The meetings will include updates on progress and provide room for discussion on program execution moving forward as well as any lessons learned and opportunities to build out or improve MHC offerings either by Enterprise or by other funders, as well as opportunities for joint advocacy to continue the momentum of supporting MHCs.

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

This work will align with New York State's Consolidated Plan, which is a comprehensive plan identifying the public infrastructure, community development, and affordable housing needs of the state. HCR produces this plan every five years with its sister agencies to align with the priorities of HUD funds, such as for CDBG and HOME. The Consolidated Plan Goal that aligns with the PRICE proposal include:

- Create and preserve decent homes and a suitable living environment for extremely-low, low- and moderate-income New Yorkers.
  - o Objective: Improve availability and accessibility by preserving existing affordable housing and building new and affordable workforce, senior and homeownership housing.
  - o Objective: Improve affordability by providing homeownership and rental assistance.

The Consolidated Plan also lists manufactured housing as a “critical component of the affordable housing stock in New York State.”

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## **Exhibit E - Capacity**

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

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

### **Enterprise Community Partners**

Enterprise's mission is to make home and community places of pride, power, and belonging, and platforms for resilience and upward mobility for all. Enterprise operates on a national scale with a local on-the-ground presence through 11 regional offices and experts who work exclusively in rural and Native American communities. Over its 40-year history, Enterprise has invested over \$72 billion to create or preserve over 1 million homes nationwide.

Enterprise is the only national nonprofit that does it all -- solutions, capital and community development -- under one roof. We bring unmatched breadth, scale and expertise across the spectrum of affordable housing. Across our three divisions, Enterprise brings honed skills and full range of capabilities to our work across these impact areas to maximize our impact and reach our goals. This includes financial products, policy, advisory services, technical assistance, program design and evaluation and development and property management.

- The Solutions Division scales solutions that work by supporting community development organizations with funding, programs and technical assistance and advancing housing policy at every level of government.
- The Capital Division aggregates and invests capital in homes and communities using discipline and creativity to achieve impact and returns.
- The Communities Division is our in-house nonprofit developer--building, preserving and managing thousands of affordable homes in the Mid-Atlantic that more than 20,000 people call home.

The New York Solutions team will carry out the proposed work, but we will draw on Enterprise's whole breadth of experience to inform the project and ensure efficient and responsible use of funds. For over 36 years, our New York office has played a pivotal role in addressing changing affordable housing and community development needs. We have committed more than \$5.4 billion to create or preserve over 85,000 affordable homes across New York state. The team is committed to ensuring access to quality homes that are safe, stable and affordable and to undoing the impacts of systemic racism in housing policy.

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

**All Applicants:** Detail your prior experience proposing, managing, implementing, and coordinating community development projects like the one you are proposing. Describe the roles and responsibilities your organization

played, as well as those of partner organizations, if applicable. Provide references from clients, which may include but are not limited to beneficiaries and partners, verifying your experience.

Enterprise has 40 years of experience managing a range of projects. Below is a sample related to the functions that our PRICE proposal will entail. We also include information about our partner, HCR.

### ***Bank Settlement Deployment.***

Between 2013 and 2023, Enterprise oversaw over \$227,000,000 in funding for community development in New York State obtained through settlement negotiations between the New York State Office of the Attorney General (OAG) and a range of banks in response to their actions in the wake of the 2009 financial crisis. Enterprise partnered closely with the OAG, HCR, and with municipalities through the State to co-develop and execute over 25 different programs, oversee over 200 discrete grants and contracts to stakeholders across New York state, providing technical assistance, strategic guidance, and funding to seed locally-driven initiatives to build up communities devastated by foreclosures and blight. A sample of the programs included:

- Providing seed funding to HCR's newly revamped Manufactured Home Advantage Program, funding the acquisition of 3 sites (2 Park of the Future sites and one MHAP site), and three additional sites are currently in the pipeline to be funded. Since its inception in 1990, MHAP has also helped form 18 cooperatively owned parks impacting 1,358 total homes by tenant-run cooperatives or mission-based non-profit owners.
- Bringing together municipalities throughout the state in learning collaboratives to develop in-situ, expert-informed, peer refined solutions to code enforcement (cohort launched in 2017) and displacement challenges (cohort launched in 2020). For each cohort, Enterprise engaged subject matter experts to support municipalities with data analysis and strategy development and facilitated regular peer-to-peer engagement among participants to dive deeper into specific topics of interest. Strategies stemming from these learning networks included seeding local housing trust funds, implementing data-driven proactive housing inspection protocols, and launching landlord-tenant mediation facilities. Each funded solution was developed by teams comprising municipal leadership and community stakeholders including established local non-profits and non-traditional partners such as community organizers and block associations. Enterprise, the OAG, and subject matter experts advised on the strategies as they were being developed.
- Leveraging the expertise of non-profit affordable housing operators to support the preservation efforts of unregulated affordable multifamily housing. Enterprise deployed eight regionally-based non-profit affordable housing operators to identify small-portfolio landlords of unregulated multifamily affordable housing in their communities, support them in stabilizing property operations, and guide them through the process of obtaining public and private preservation resources.
- Supporting nascent community land trusts and land banks with funding and technical assistance to undertake blight remediation and strategic preservation.
- Guiding faith-based institutions interested in developing affordable housing on their land through the early predevelopment process.
- Launching Housing Choice Voucher mobility programs.
- Expanding fair housing testing to new communities.

- Providing public housing authorities with strategic planning and funding to preserve their portfolios.
- Incentivizing Medicaid providers to provide integrated pest management in apartments home to children with asthma.

All of these initiatives involved the co-development of program parameters and coordinated program execution among a diverse group of partners and stakeholders, creating competitive RFPs, and executing and monitoring subgrants and subcontracts.

***Weatherization Assistance Program + Electrification.***

A current example is our deployment of Department of Energy (DOE) Innovation Grant funding to incorporate electrification into the Weatherization Assistance Program (WAP).

Every year, WAP improves energy efficiency in 5,700 units housing low-income residents throughout New York State. Traditionally, the WAP scope is limited to energy efficiency improvements; while vital, this misses the opportunity to incorporate more holistic upgrades, including positioning the homes to take advantage of new decarbonization technology.

Enterprise is partnering with HCR, the New York City Department of Housing Preservation and Development, and the Association for Energy Affordability (AEA) to create new pathways for incorporating electrification into WAP in multifamily buildings, including developing a new protocol to prioritize buildings in need of WAP + electrification, as well as a new audit tool to develop a needs assessment and scope of work incorporating both electrification and energy efficiency. The protocol and tool will be disseminated to WAP programs throughout the United States to inform providers and government decision makers with information on how to include decarbonization into WAP. Our work in braiding together holistic energy solutions is particularly vital as federal Inflation Reduction Act funding flows down to states for additional climate resiliency initiatives.

Enterprise developed the concept and is coordinating execution among all project partners. Enterprise is the primary grantee with the DOE and is sub-granting funding to AEA to undertake the WAP audits and building upgrades. We are coordinating the development of the protocols together with AEA and the two government partners, identifying pipeline buildings to pilot the protocols, facilitating the sharing of lessons learned, taking the lead on modifying the workplan as our innovation evolves, and ensuring that all partners are on track to meet our deliverables.

***Detroit Energy Efficiency and Home Improvement Program (DEEHIP).***

Enterprise is getting ready to launch DEEHIP, a \$2MM project funded through a Community Project Funding (CPF) grant from HUD. Enterprise is partnering with an Implementation Partner, and five community development organizations (CDOs) that represent and serve the 13th District in Detroit. This program will be launched in Q3 2024 and has four program deliverables:

1. Energy Efficiency Improvements and Home Repairs: Complete home energy efficiency/health and safety interventions on 100 houses, leaving them meaningfully more energy efficient, safe, and healthy while reducing utility cost burdens for the homeowner and increasing their economic stability.

2. **Workforce Development:** Five to ten residents from within the programs' geographical boundaries will successfully complete a 6-week training program aimed at obtaining a nationally recognized certification (Building Performance Institute (BPI) Building Analyst (BA)) and placement into the energy efficiency workforce.
3. **Community Engagement and Capacity Building:** Increase community members' awareness and education of energy efficiency and clean energy resources and develop advocates that can take on advocacy and leadership roles around these topics in their communities.
4. **Program Evaluation:** A final evaluation report created at the conclusion of the grant-funded activities will report on program outputs and outcomes, highlight program successes and challenges, and discuss lessons learned through program implementation that can inform future program scaling and replication.

Enterprise is working with the City of Detroit to complete the Environmental Reviews, which are subject to NEPA.

### ***Rural Rental Academy***

Enterprise's Rural housing team has been hosting geographic-based training series to equip affordable housing operators with the tools to support the preservation of vulnerable rental housing stock. We recently completed the Southeast Preservation Academy, which focus on the improving the preservation and acquisition of rural rental affordable housing through training sessions, peer exchange, and technical assistance for groups in Georgia, Alabama, and Mississippi. Through 14 training sessions over 7 months, Enterprise Community Partners worked alongside Truist bank, Georgia Power, and Fannie Mae to preserve rural rental housing. 11 affordable housing organizations were provided training through 10 webinars and several additional peer-learning sessions.

### ***HCR and Manufactured Homes***

New York State Homes and Community Renewal (HCR) continues to prioritize the needs of manufactured home communities, its tenants, and potential homebuyers of manufactured homes.

**For tenants and homeowners:** HCR is the enforcing agency to New York State Real Property Law (RPL 233) that governs tenants' right in manufactured home communities. HCR trained staff work with park owners and tenants to resolve disputes in compliance with the statute's requirements. This is particularly pertinent to homeowners who lease land in manufactured home parks and need to contend with rising land lease prices and face a lack of maintenance of critical infrastructure suitable for living.

The Mobile and Manufactured Home Replacement Program (MMHR) program serves the needs of owners of manufactured homes who wish to replace dilapidated mobile or manufactured homes that are sited on land owned by the homeowner with a new manufactured, modular, or site-build home. This program is eligible for the low-and moderate-income homeowners at or below 80% of the area median income (AMI). HCR has 28 partnering nonprofit housing organizations and municipalities helping to implement this program with the goal of helping 141 manufactured home replacements.



**For manufactured home communities:** HCR has programs directed towards community owners who wish to improve the infrastructure of their parks. The Manufactured Home Advantage Program (MHAP) offers affordable financing for the acquisition and/or rehabilitation of manufactured home communities. Through this program, for profit companies, nonprofit affordable housing organizations, and resident-led cooperatives, may access below market rate financing to purchase and/or rehabilitate a manufactured home community.

For residents of manufactured home communities who wish to purchase their park and form cooperatively owned communities, the Manufactured Home Cooperative Fund (MHCFP) exists to help achieve this goal. This program provides financing for the purchase of the community, forming cooperatives, and making infrastructure improvements. By owning and managing their parks, residents can take greater control over their housing costs and living conditions.

**For potential homebuyers:** The State of New York Mortgage Agency (SONYMA) has offered its traditional first-time homebuyer programs, Achieving the Dream and Low-Interest Rate Program to low-and-moderate income buyers of manufactured homes. This year, it will additionally be introducing a new personal property loan program (not only mortgage) that will offer financing to purchase manufactured homes at rates below what is offered in the chattel loan market and with all the protections and provisions of what its traditional mortgage products provide. This will allow consumers to have loans that have the protections of SONYMA provisions and makes purchasing a home even more affordable and safe.

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

**All Applicants:** Provide at least one example of your experience managing and expending grant funds (ideally, but not necessarily, federal grant funds such as CDBG, NSP, CDBG-DR, HOME, or Section 108 funds, or in the case of Tribal Applicants, IHBG or ICDBG funds) to complete a project. Describe funds expended, for what purpose, and any challenges you experienced. If describing an example of your experience managing and expending federal grant funds, describe your experience meeting associated obligations and federal requirements.

Enterprise has extensive experience managing and expending grant funds from public and private sources. Over the past five years alone, Enterprise has managed nearly \$276 million in federal grants from HUD, USDA, CDFI, USDT, DOE, HHS, and NEA. Over the past several years, Enterprise has also provided TA and capacity building support on implementation of large federal housing and community development programs through HUD, USDA, CDFI, USDT, DOE, HHS, IRS, and NEA.

Enterprise was recently awarded \$2 billion in Inflation Reduction Act Funding under the EPA's National Clean Investment Fund (NCIF) as part of a coalition of some of the country's leading community and housing organizations called Power Forward Communities. Enterprise will lead the effort with Rewiring America, alongside Habitat for Humanity International, United Way Worldwide, and LISC. Our coalition will harness these funds to provide financing to housing providers across the country to phase out older technologies, weatherize homes, and make them more efficient.

The HUD programs and initiatives we have worked on include Section 4, CDBG, CDBG Disaster Recovery, Section 108, HOME Investment Partnerships Program, Housing Opportunities for Persons with AIDS (HOPWA), HUD Consolidated Planning, Public Housing

including Rental Assistance Demonstration (RAD) and Moving to Work (MTW); Fair Housing including Assessments of Fair Housing, Analyses of Impediments to Fair Housing Choice, and other planning efforts; TA on Language Access Plans, Affirmative Marketing, and other regulatory requirements, and affirmatively furthering fair housing (AFFH) best practices; the Neighborhood Stabilization Program (NSP); and the Distressed Cities TA program through HUD's Community Compass program and the agency's prior TA initiatives. Enterprise staff has also delivered various HUD-funded trainings to grantees on several programs, including the development and delivery of basic CDBG and CDBG-MIT curricula.

Over the last five years, Enterprise has supported the implementation of HUD programs in more than 500 city, county, and state housing departments and public housing agencies. Enterprise has been awarded multiple USDA contracts over the last 15 years, including across all four US regions, to support 515 Housing Preservation, multiple Rural Community Development Initiative awards to provide TA to rural and Tribal organizations, including on USDA RD, HUD 811 and 202, LIHTC and other subsidized and affordable housing preservation programs, and capacity building work in rural communities of persistent poverty.

#### ***Example of Experience - HUD Section 4.***

Enterprise has administered HUD Section 4 funds for 32 years, providing grants, loans, and TA to organizations serving rural, Native American and urban communities. Our stewardship of Section 4 resources has helped these partner organizations remain vital forces in underserved communities. Over the past ten years, we have provided 1,790 grants totaling more than \$143 million to 702 CDCs/CHDOs. Enterprise Operations Management (OM) staff works with local market staff to ensure compliance with HUD regulations and maintain efficient operating procedures. The team has extensive experience in program administration and management, including program compliance, reporting and financial administration. Local market staff work with OM to verify that all Section 4 activities, proposed beneficiaries, and costs are eligible. Additionally, each grantee is evaluated for their risk of noncompliance with Federal statutes, regulations and the terms and conditions of the subaward to determine the appropriate level of monitoring. Federal funds that are passed through to our Beneficiaries are monitored by our OM staff. Oversight by the Vice President of OM ensures a high standard of quality control. Enterprise resolves any quality control issues in a timely fashion through active, open communication with HUD staff. OM staff ensure timely reporting from subrecipient grantees and monitor all work plans to ensure budgetary compliance and minimize cost overruns. OM staff also work with subrecipients of Section 4 to build capacity to understand federal requirements contained in 2 CFR 200 and to receive and manage federal funds in a cost-efficient and compliant manner. The most recent HUD monitoring visit took place June 5th-8th, 2023 and noted no findings.

Enterprise was recently awarded \$32 million in HUD Section 4 Funds for FY22 and FY23. We expect to target 500 grants while serving at least 650 CDC's, CHDO's and Tribally Designated Housing Entities (TDHE's) during these fiscal years resulting in 8,000 housing units created or preserved and 13,100 jobs created, among many other important organizational and community outcomes.

Enterprise has extensive experience issuing RFPs and managing subgrants for various federal agencies. Each year for Section 4, Enterprise develops a competitive RFP released nationwide

through which beneficiaries are selected to receive capacity-building grants. Enterprise staff review and score applicants' proposals based on the scoring criteria outlined in the RFP to ensure that selected recipients meet eligibility requirements and have proposed thought-out and realistic plans that address funding priorities and goals. Our application process ensures that funds are deployed to organizations that demonstrate both need and potential for impact in communities, but that also can capably implement activities and achieve outcomes. OM provides oversight and management of the award and support to Enterprise staff, grantees, and other eligible beneficiaries regarding program regulations and compliance. OM staff coordinates the submission and approval of activity budgets and workplans by HUD, including ongoing reporting, amendments, and closeout processes during the performance period.

We have successfully completed or are in the process of successfully completing our federally and non-federally funded assistance agreements.

**Provide references from clients, which may include but are not limited to beneficiaries and partners, verifying your experience.**

Kerri White, Special Assistant for Housing & Community Development  
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**Who are your key staff?**

**All Applicants:** List key staff from your organization (and your partner organizations, if applicable) who will be responsible for project leadership, management, and implementation, and the roles they will perform throughout the project(s) life cycle. Describe how your organization will manage partner organizations, if applicable, to ensure they are meeting expectations required for successful project implementation. Describe any gaps, vacancies, and contingency plans addressing potential staff or partner loss during the project. If applicable, list your for-profit partner(s) and their financial interest in your proposed project. This may include, but is not limited to, land ownership within the project area(s).

Enterprise has the staff and systems in place to comply with the provisions of this NOFO. Key staff have broad, deep, and longstanding experience implementing community development projects and managing federal funds. As we do with every project we undertake, we will engage with colleagues throughout Enterprise to pull from the breadth of expertise at our organization. Finally, we will procure a consultant through a competitive RFP process to advise us on CDBG compliance.

**Elizabeth Zeldin, Director, Neighborhood Impact Program** will provide program oversight and direction. Elizabeth leads Enterprise's Neighborhood Impact Program, which strengthens New York's low-income communities by deploying capacity building, green, resilience and health focused solutions to affordable housing preservation. She has launched an array of programs and has developed several new financing platforms to support the preservation of affordable housing throughout the State. She is currently overseeing programs focused on building the asset management capacity of non-profit affordable housing operators, training nascent community land trusts in real estate development, decarbonizing New York's multifamily affordable housing stock, facilitating a peer learning network of small and mid-sized municipalities interested in boosting their affordable housing ecosystems, and connecting non-profit housing experts with small-scale landlords interested in preservation. She recently oversaw the deployment of \$227 million of programs to boost the capacity of municipalities and non-profits throughout the State to strengthen their communities. Elizabeth started at Enterprise in 2007 as a lending program officer, underwriting a variety of acquisition, predevelopment and construction loans, and has also underwritten several low-income housing tax credit transactions as a tax credit syndicator. Prior to her time at Enterprise, Elizabeth worked at the New York City Department of Housing Preservation and Development on tax incentives and inclusionary housing, at HR&A Advisors on an array of urban planning initiatives, and at the New York City Independent Budget Office analyzing and communicating the City's budget and policies. She holds a B.A. from Rutgers University and an M.A. in Economics from New York University.

**Jenny Yang, Program Director, Neighborhood Impact Program** will manage the program execution. Jenny manages several initiatives that build the capacity of community-based and affordable housing organizations to successfully steward their internal operations and housing portfolios. She oversees \$500,000 in annual grants to support approximately 10 affordable housing organizations through the HUD Section 4 Capacity Building Program. Ms. Yang supports new initiatives to support Black, Indigenous, and People of Color (BIPOC) and other historically marginalized housing providers, including Equitable Path Forward, a nationwide initiative to help dismantle the legacy of racism in housing. She oversees green and electrification initiatives including a \$2M pilot project through the U.S. Dept. of Energy to develop a pathway to integrate electrification into the NYS Weatherization Assistance Program and originate loans and grants through the NYS Climate Friendly Homes Fund, a \$250 million program to fund electrification retrofits in at least 10,000 units of multifamily housing in partnership with NYS HCR and CPC.

Ms. Yang managed both the New York market and National Covid-19 response programs to support affordable housing owners, operators, and services providers to maintain operations and adapt their housing preservation and production activities, programs and services to meet evolving mid-and long-term resident and community needs as a result of the Covid-19 pandemic. She designs and implements new initiatives to preserve affordable housing in distressed and gentrifying neighborhoods in New York State, including the Community Land Trust Capacity Building Initiative and the Anti-displacement Learning Network, deploying over \$30 million in bank settlement funds. She also developed and implemented the Enterprise Leadership Institute, a comprehensive training, mentoring, and coaching program to cultivate the next generation of diverse CDC leaders that represent the communities they serve and the Enterprise Asset

Management University program, a two-year training and technical assistance program to strengthen the asset management capacity of 17 nonprofit and minority- and women-owned business enterprise (MWBE) affordable housing operators, with a collective portfolio of 14,000 units. Ms. Yang led Enterprise's contribution to the New York City Build It Back Multifamily Loan Program through CDBG-DR, shepherding \$6.5 million in loans to 26 property owners affected by Superstorm Sandy, and supported the development of a template for resiliency upgrades in affordable housing buildings. Prior to joining Enterprise, Ms. Yang interned with the State of New York Mortgage Agency, the New York City Department of City Planning and the Local Initiatives Support Corporation.

Ms. Yang holds a Master of Urban Planning (MUP) with concentrations in community development and urban management and economic and international development, as well as a B.A. in sociology and urban and public policy from the University at Buffalo, The State University of New York.

**Baaba Halm, *Vice President and Market Leader*** will provide strategic guidance and leadership. Baaba leads a 50-person cross-functional team delivering program, capital and policy solutions to address New York's most complex housing challenges. Under Baaba's leadership, the New York market is increasing the housing supply, advancing racial equity, and building resilience and upward mobility through developing and deploying programs that focus on preservation, homelessness, fair housing, justice involved housing, faith-based development, economic mobility, leveraging the affordable housing sector to create career pathways, supporting BIPOC developers, and much more.

Baaba has two decades of experience in housing, community development, and policy, and a deep commitment to racial equity. She most recently served as the executive deputy commissioner and chief diversity officer at the NYC Department of Housing Preservation and Development (HPD). There, she was second in command to the commissioner, overseeing six divisions; divisions included Asset & Property Management and Diversity, Equity, and Inclusion/EEO. During her tenure, she crafted the Equitable Ownership Requirement benefiting minority-owned developers and the agency's first in-kind program to foster the participation of minority vendors across the entire affordable housing portfolio; led HPD's assessment of equity and inclusion practices to strengthen the recruitment and retention of a diverse workforce; and partnered with Enterprise to create the Pathways to Opportunity Program for minority and women-owned business enterprises and nonprofits to become marketing agents for affordable housing projects.

**Adrienne Hull, *Manager, Public Awards*** will support the systems and compliance for the program. Adrienne will oversee grant management and ensure that HUD compliance requirements are met. She has 20+ years in grant management for nonprofits and local government. At Enterprise, she leads the administration, reporting and compliance for federal, state, and local funding awards. Ms. Hull holds a Master of City and Regional Planning (MCRP)

with concentrations in community development and urban sustainability from Morgan State University, as well as a B.A. in sociology from Spelman College.

### **NYS Division of Housing and Community Renewal**

**Dina Levy, *Senior Vice President of Single Family and Community Development*** will provide strategic direction for the program. Dina Levy is Senior Vice President of Single Family and Community Development responsible for the State of New York Mortgage Agency (SONYMA), Office of Community Renewal, and Faith-Based Initiatives. Prior to joining HCR, Dina served as Director of Community Impact and Innovation for Attorney General Eric T. Schneiderman where she was senior advisor to the Attorney General on negotiations of multi-billion-dollar bank settlements and oversaw relationships with state and national stakeholders. Prior to that, she was Special Assistant to the Attorney General. Before joining the AG's Office, Dina worked for the Urban Homesteading Assistance Board (UHAB) where she served as Director of Organizing, building strategic coalitions to preserve, expand and improve the quality of affordable housing across New York City.

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

**All Applicants:** Describe your experience working directly with underserved communities, particularly Black and Brown communities, to design or operate programs that equitably benefit such groups, or experience successfully advancing racial equity in other ways. This may also include experience soliciting, obtaining, and applying input from such groups when designing, planning, or implementing programs and activities.

Racial equity is at the center of our work, and one of the three pillars of Enterprise's five-year strategic plan launched in 2020. By virtue of both systemic racism and the socioeconomic dynamics that lead to communities being designated as 'distressed' or as experiencing 'persistent poverty,' much of the work that we do seeks to address challenges faced in predominantly Black, Indigenous, People of Color (BIPOC) communities. Through our technical assistance and capacity building work, Enterprise takes steps to identify barriers where present in program design, delivery, etc., Enterprise provides guidance to grantees and local partners on ways to mitigate barriers and includes people impacted by programs and technical assistance in the design of these programs. Enterprise works to understand the inequities that exist in communities and actively designs technical assistance programs that provide greater access to capacity building resources and capital for BIPOC communities and developers. Through our Equitable Path Forward initiative, we are investing and leveraging \$3.5 billion to support BIPOC developers serving their communities affordable housing needs. We also leverage our policy, solutions and capital expertise to ensure LIHTC allocation plans are created through a racial equity lens and have supported Racial Equity Impact Assessments for two LIHTC QAPs. Enterprise also has diverse staff with lived experiences to address the needs of underserved communities. Our Tribal Nations team includes culturally competent staff from Tribal communities who understand the unique characteristics and circumstances of working in these communities. Enterprise staff also has experience in providing translation services to those not fluent in English.

Enterprise co-convened the New York Statewide Affordable and Fair Housing Roundtable in 2018 with the Fair Housing Justice Center to bring together the fair and affordable housing advocacy communities to develop shared priorities. In 2019, we published *Closing the Divide*, our shared platform that identified policy priorities around fair housing protections, tenant protections, increasing the supply of multifamily housing, and removing exclusionary zoning. The roundtable spurred a coalition led by Enterprise that successfully enacted Statewide source of income protections in 2019, which disproportionately impacts women-led households of color, and is often used as a proxy for discrimination based on race. Enterprise has been active on ensuring the law was adequately enforced and tenants and landlords are educated about the law ever since. We are currently focused on fair housing coordination with HCR's mobility counseling program, which Enterprise administers, as well as addressing new barriers, like proxy discrimination in the form of income requirements and credit checks for voucher holders.

In 2020, Enterprise and the New York State Office of the Attorney General launched Eliminating Barriers to Housing in New York (EBHNY), a two-year, \$4.5 million statewide pilot program aimed at eliminating systemic housing discrimination based on race, national origin, disability, source of income, and other federal, state and local protected classes. The program funded six Qualified Fair Housing Organizations (QFHOs) that are operating as full-service fair housing organizations across the State through December 2022. The program successfully allowed nonprofits to hire 20 new staff members, hold 370 training events, conduct nearly 1500 fair housing tests and take over 100 enforcement actions against discriminatory action. The funding also allowed provider to expand into 'fair housing deserts' with no existing providers in rural regions of the North Country, Capital District and Southern Tier

When the program ended in 2022, we successfully advocated for the program to be absorbed into a new HCR program, where providers conducted an additional 500 tests and hold 60 training events in a single year. While we no longer administering the program, we successfully advocated for program funding to be doubled in 2024, from \$2 million to \$4 million.

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

**All Applicants:** Describe your experience conducting environmental reviews in accordance with 24 CFR part 50 (non-profits not in consortium with a state government, tribal government, or unit of general local government) or 24 CFR part 58 (state government, tribal government, and units of general local government, or non-profits in consortium with any of the aforementioned). Please note that for physical development activities or property acquisition, you are generally prohibited from acquiring, rehabilitating, converting, demolishing, leasing, repairing, or constructing property, or committing or expending HUD funds until an environmental review process has been completed.

While the New York team overseeing the PRICE work has undertaken several projects with federal resources, including most recently a Department of Energy Innovation Grant, and have experience reviewing Phase I and II environmental reviews typical for multifamily finance due diligence, we do not have direct experience with federal requirements on environmental reviews. Enterprise will therefore competitively procure subcontractors with deep expertise in conducting environmental reviews that comply with all PRICE requirements to ensure that we have the systems in place to successfully undertake this work.

### ***Enterprise Louisiana Loan Fund***

Enterprise received an \$8,500,000 grant of CDBG-DR through a Cooperative Endeavor Agreement (CEA) with the State of Louisiana Office of Community Development in March 2007. The purpose of the grant and CEA was to operate a loan fund to support the recovery and rebuilding of multifamily housing following Hurricanes Katrina, Rita and Wilma through the provision of acquisition and predevelopment loans to developers. Enterprise was required to raise additional private capital (\$16 million) to supplement the CDBG-DR. After some period of time, due to an identified need in the market, an additional use was added to the eligible uses of loan proceeds- to support single family home construction on properties made vacant by the storm. Nonprofit organizations had been awarded vacant properties and CDBG-DR as construction subsidy as well as subsidy for homebuyers, but were unable to access construction financing to build new single family homes without a committed takeout source. Enterprise utilized the loan fund to provide commitments of takeout financing to the construction lenders and Enterprise was then repaid by the first and second mortgage proceeds. The model successfully supported the development and sale of over 300 single family homes and the construction of several hundred multifamily apartments.

As part of the Scope of Services, Enterprise was required to comply with CDBG-DR program requirements and all applicable Federal and State Laws and Regulations, and to pass through applicable laws and regulations to borrowers under the loan programs.

These include:

Environmental Review 34 CFR 58 and 24 CFR 58.22

Relocation Assistance 49 CFR 24

Historic Preservation 36 CFR 800 as applicable

Floodplain/Wetlands 24 CFR 55

Lead Based Paint 24 CFR 35 as applicable

Davis Bacon as applicable

Non-Duplication of Benefits

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

**All Applicants:** Describe your experience with cross-cutting federal requirements and how you will comply with 2 CFR part 200 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards), Davis-Bacon labor standards (not applicable to Tribal Applicants), fair housing and nondiscrimination requirements, and the 49 CFR 24 (Uniform Relocation Act).

While the New York team overseeing the PRICE work has undertaken several projects with federal resources, including most recently a Department of Energy Innovation Grant, the individuals on our team have not managed grants with all the requirements imposed by PRICE. Enterprise will therefore competitively procure subcontractors with deep expertise in cross cutting federal requirements to ensure that we have the systems in place to successfully undertake this work.



***Enterprise Community Development***

Enterprise Community Development (ECD) is Enterprise's in-house nonprofit developer focusing on building, preserving and managing thousands of affordable homes in the Mid-Atlantic. ECD is a robust development entity and at any given time, ECD construction management dept is overseeing \$200 million or more that must comply with cross-cutting federal requirements.

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## Exhibit F: Match or Leverage

PRICE Main applications do not require external funding. However, HUD views external funding as an indicator of support and commitment to the project. Additional funds may also increase the effectiveness of the proposed activities. PRICE Replacement Pilot applicants require evidence of non-federal match funding amounting to more than 50% of the requested CDBG funds, not including non-financial contributions.

For PRICE Main proposals, points will be awarded in accordance with Table 3 based on the percentage of leveraged commitments for the proposed activities.

**Table 3: PRICE Main Scoring for Leveraged**

<b>Leverage commitments as percent of grant funds requested</b>	<b>Points awarded</b>
More than 50 percent	2
50 percent or less	1
No leveraged funding	0
<b>Funding risks</b>	<b>Points awarded</b>
Description of funding risk and contingency plan (see below)	3

All Applicants: Describe in your narrative the sources and amounts of match or leveraged funding, along with other resources or expertise those sources bring to the proposed project. These may include funding from state and local government sources, the non-profit sector, the private sector, among other potential sources. In addition to financial contributions, applicants for PRICE awards may credit the dollar amounts of any non-financial contributions towards their percentage of leveraged commitments. Please note that non-financial contributions will not count towards the total percentage of match for PRICE Replacement Pilot awards. Applicants must follow the below requirements in compiling and documenting match or leverage for the purposes of this NOFO. Otherwise, it may not be possible for HUD to count the commitment at the level claimed. These general requirements apply to all match or leveraged resource commitments.

Resources must be firmly committed as of the application deadline date. "Firmly committed" means that the amount of the resource is a specific dollar amount and its dedication to PRICE activities is explicit. Estimates or dollar amount ranges are not considered a specific dollar amount and will not be considered. Endorsements or general letters of support alone will not count as resources and should not be included in the application.

Match or leverage documents must represent valid and accurate commitments of future support. They must detail the dollar amount and any terms of the commitment. They must also indicate that the funding is available to you for the activities directly related to undertaking your PRICE proposal.

Resource commitments must be written and signed and dated by a person authorized to make the commitment.

1. Commitment letters must be on official letterhead, or they will not be accepted. Note that commitment letters must be and are considered binding.
2. If the commitment documentation is not included in the application and submitted before the NOFO deadline, it will not be considered. 6. Staff time and benefits of the Applicant and/or Partner(s) (if any) are not an eligible match or leveraged resource.

All Applicants: Describe proposal or project funding risks, such as being awarded less funding than requested through PRICE, or withdrawal of support from other funder(s) or internal budget risks which may prevent you from meeting your proposed timeline or completing certain activities. What is your contingency plan for addressing these funding risks?

HCR will provide leverage totaling at least 50% of the grant through a combination of MHAP, a special allocation of Weatherization Assistance Program funding, and the Manufactured Home Loan Program. The first two will be dedicated sources that PRICE-funded activities will enable while the last will be incorporated into the mortgage closing process.

## **Exhibit F- Long Term Effect**

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

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

All Applicants:

How will your proposed activities retain other affordable housing opportunities for LMI households in the community? How will you ensure LMI households are not eventually priced out of the community? How will you help current renters and homesite renters become homeowners or otherwise acquire an interest in the lot?

How will your proposed activities ensure the long-term affordability, including lot rents and other fees as applicable, of housing without future federal subsidies? Note: affordability requirements applicable to this NOFO can be found in Section VI.E of this NOFO.

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?

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

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

The affordable housing sector in New York State is robust, with a seasoned ecosystem of developers and operators, recognized pathways for preservation and financing, and explicit focus on resident rights and housing quality. Manufactured housing has traditionally been disconnected from the robust sets of tools developed for the affordable housing sector. Enterprise and HCR propose to leverage PRICE funding to knit the two sectors and poise manufactured housing communities to take advantage of the resources available to traditional affordable housing.

We hope to demonstrate that a comprehensive and scaled approach to strengthening MHCs will be transformative in allowing local community stakeholders to re-envision the value of MHCs, stabilize a key affordable housing option for low- and moderate-income New Yorkers, and incorporate MHCs more thoroughly into the affordable housing ecosystem. After working with MHCs over the course of this work plan, affordable housing operators and developers will better understand how to incorporate MHCs into their work; after a significant number of MHCs will be improved, neighbors and local governments will shift a sometimes skeptical approach to MHCs in their communities; after a concerted amount of legal representation, MHC residents will better understand their rights and owners will understand the importance of adhering to rent laws; after tracking the experience of 500 real-estate-like mortgages on manufactured homes, lenders and regulators will better understand opportunities to continue rolling out financing products to provide homeowners with affordable mortgages; after undertaking repairs to 1,500

individual manufactured homes, we will have a better understanding of best practices in preserving homes and better aligning them with energy programs.

Enterprise will leverage our nationwide platform to educate the affordable housing sector on pathways to improve and strengthen this vital source of housing affordable to low- and moderate-income households. We will share our experience through blog posts, white papers, and in topical convenings, with a focus on sharing lessons learned with state, county, and municipal governments, mortgage lenders, and affordable housing operators and developers.

During the course of the workplan, we expect to support approximately 500 households to become homeowners with affordable, low risk mortgages; we will provide legal support to approximately 800 MHC residents to keep them stably housed; we will reduce operating expenses for approximately 1,500 homeowners by repairing homes, improving their accessibility, and positioning them for energy upgrades; we will facilitate the ownership transition of approximately 10 MHCs to responsible owners or resident cooperatives with 15 year affordability requirements; and we will upgrade the infrastructure and improve climate resiliency of approximately 10 MHCs whose affordability will also be preserved for 15 years.

## **Attachment A: Advancing Racial Equity**

In accordance with Executive Order 13985, Executive Order On Advancing Racial Equity and Support for Underserved Communities Through the Federal Government, and federal fair housing and civil rights laws, you must submit a narrative demonstrating the following:

- You analyzed the racial composition of the persons or households who are expected to benefit from your proposed grant activities;
- You identified any potential barriers to persons or communities of color equitably benefiting from your proposed grant activities;
- You detailed the steps you will take to prevent, reduce or eliminate these barriers; and
- You have measures in place to track your progress and evaluate the effectiveness of your efforts to advance racial equity in your grant activities.

Note that any actions taken in furtherance of this section must be consistent with federal nondiscrimination requirements.

All PRICE applicants (except Tribal Applicants) must submit a narrative which addresses the four bullets above. Applicants who are CDBG grantees may use racial equity components of their Consolidated Plans, such as their housing and homeless needs assessments (which may be addressed in the Housing and Homeless Needs Assessment, Housing Market Analysis, or Strategic Plan sections) in fulfilling this requirement; however, applicants must ensure that the narrative demonstrates all four bullets above. This narrative will be submitted according to the instructions in Section IV.B. This narrative will be evaluated for sufficiency and will not change the applicant's score or rank as compared to other applicants. If the narrative is deemed insufficient, it will be a "Curable Deficiency" that will be communicated to the applicant for correction with a notice of deficiency.

Enterprise's Impact and Evaluation (I&E) team is a multi-disciplinary group of researchers, data scientists, and evaluation specialists with deep experience analyzing the racial composition of our HUD-funded work and evaluating the outcomes of our efforts on advancing racial equity. Our I&E team analyzed United States census data on the racial composition of residents of manufactured housing in New York State. White residents comprise 86.2% of manufactured housing in New York State, notably higher than the percentage of white residents living in the state overall. In comparison, the portion of residents in the 57 counties in New York State outside New York City who identify as white totals 69.4%. The next most prevalent racial demographic residing in manufactured housing identify as Hispanic in the Census, at 5.5%.

Barriers to more participation among communities of color include access to affordable financing. Among residents of manufactured housing, white households are currently more likely to own their homes rather than rent: 90% of MH residents who own their homes without a mortgage identify as white while 3% identify as Hispanic and 1% identify as Black.

Another barrier is the fact that MHCs are concentrated in rural communities which in New York State do tend to have lower proportions of BIPOC residents.

To reduce these barriers, Enterprise will require subgrantees receiving infrastructure and predevelopment support to affirmatively market housing opportunities to all new residents and to undertake best practices in hiring a diverse range of construction contractors. Lenders must affirmatively market their products for mortgage loans. Legal services providers must ensure

that their services are marketed to a full array of potential participants. We will strongly encourage translation of all outreach materials into Spanish and provide that service directly for grantees if they do not have that expertise.

There is currently very little data about MHC demographics – the data we have is extrapolated from Census information on MH residency as a whole. We will therefore require all subgrantees to encourage residents to fill out voluntary surveys on race, disability status, and age at the time of the initial grant and at the end of the grant performance period. This will provide a more concrete understanding of MHC demographics now and any changes resulting from PRICE funding interventions.

As an organization, Enterprise is committed to continuous improvement through rigorous review of performance and operational data. We have a comprehensive process to track progress and evaluate the effectiveness of our federally funded programs. This approach includes an in-depth analysis of applications received and trends in applicant scoring and grant awards made, allowing us to identify any opportunities to advance racial equity in our activities. Our I&E team will track our progress to eliminate barriers throughout the grant period.

## **Attachment B : Affirmative Marketing**

You must submit a narrative demonstrating that the housing, services, or other benefits provided under this grant will be affirmatively marketed broadly throughout the local area and nearby areas to any demographic groups that would be unlikely or least likely to apply absent such efforts. Such demographic groups may include, for example, Black and Brown persons or communities, individuals with limited English proficiency, individuals with disabilities, or families with children. Such activities may include outreach through community contacts or service providers or at community centers serving the target population; and marketing on websites, social media channels, television, radio, and print media serving local members of the targeted group. Documentation for this factor consists of a narrative describing the activities that will fulfill the factor requirements.

This narrative is required and must address the issues outlined in the paragraph above. Applicants will submit this narrative according to the instructions in Section IV.B. This narrative will be evaluated for sufficiency and will not change the applicant's score or rank as compared to other applicants. If the narrative is deemed insufficient, it will be a "Curable Deficiency" that will be communicated to the applicant for correction with a notice of deficiency (note: this narrative does not count towards the application page limit).

Enterprise will require our subgrantees to engage in affirmative marketing for program beneficiaries and to reach out to an expansive list of contractors to undertake the work. We will provide training to all subgrantees to make this possible. Specific requirements will include:

- For the portions of PRICE work engaging individual households, including home repairs, mortgage principal reduction, and legal services:
  - o Advertising in a range of mediums including print publications, websites, and social media that reaches an array of demographics, including focusing on Black, Hispanic, and Tribal communities; in Spanish; across ages, including seniors; and to online hubs for disability rights advocacy.
  - o For grantees working in common geographic areas, Enterprise will provide the option of undertaking joint messaging for the various offerings, subject to whether the grantees would be interested in such coordination.
- For the portions of the PRICE work focusing on MHC infrastructure and preservation, affirmative marketing requirements will be put in place during the 15-year compliance period. MHC owners will be provided with affirmative marketing training and be required to affirmatively market any vacancy that occurs during this period.

## **Attachment C: Affirmatively Furthering Fair Housing**

This narrative is a mandatory requirement and limited to no more than two pages. This narrative will be evaluated for sufficiency and will not change the applicant's score or rank as compared to other applicants. This narrative will not count toward the 40-page limit. If the narrative is missing or incomplete, it will be categorized as a "Curable Deficiency". The notice of deficiency will be communicated to the applicant for correction and must be remedied within three days of notification, as outlined in the NOFO. See the Affirmatively Furthering Fair Housing heading under Section IV.G. of this NOFO for more information.

All Applicants (except Tribal Applicants): Address the barriers to AFFH you described in V.A.1.a. Describe meaningful actions you will take that provide opportunities to access safe, accessible, and healthy housing by protected class groups, how your actions promote integration and reduce segregation, and/or transform racially or ethnically concentrated areas of poverty into areas of opportunity. Discuss how you will carry out the proposed activities in a manner that affirmatively furthers fair housing in compliance with the Fair Housing Act and its implementing regulations, and how applicants will meet the requirements of the definition of AFFH at 24 CFR 5.151. Additionally, describe how you will maintain compliance with civil rights laws.

Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunities, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all program participant's activities and programs relating to housing and urban development.

With PRICE funding, Enterprise and HCR will expand opportunities for some of New York State's most vulnerable households to enter homeownership through an affordable and low risk financing option, receive legal support to stay in their homes, and enjoy living in a safe and quality community and in safe and quality homes.

Providing low-cost mortgages to households that have traditionally been locked out of homeownership opportunities will expand the ability of a wider range of New Yorkers – by race, disability status, and age – to take advantage of the stability and wealth building opportunities provided by homeownership. Further, ensuring that all MHC residents can access legal services will reduce the gaps in housing stability among protected classes.

Ensuring better infrastructure, sanitation, and mitigation and adaptation to flooding and extreme heat within MHCs will improve the housing quality of low-income people, many of whom are living with disabilities and/or are seniors. Improving homes with a focus on accessibility and aging in place upgrades will allow protected classes to remain in their homes and communities.

PRICE funding for infrastructure upgrades and predevelopment grants will prioritize activities in communities with good educational outcomes, low crime, and quality jobs and transportation to ensure that MHCs in communities of opportunity, which are most vulnerable to loss, can be preserved.

We will also leverage tools created by HCR to further their existing AFFH work. HCR deploys AFFH training, guidelines and planning checklists for recipients of capital financing sources.