

St. Vincent de Paul Georgia

Draft Application

U.S. Department of Housing and Urban
Development
Preservation and Reinvestment Initiative for
Community Enhancement (PRICE) Competition
FR-6700-N-99

Draft for public comment

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**St. Vincent de Paul Georgia
Draft PRICE Main Application**

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Exhibit A – EXECUTIVE SUMMARY

Category of Funding and Amount Requested:

One application is submitted; it is for the PRICE Main category in the amount of \$12,500,000.

Applicant:

St. Vincent de Paul Georgia (SVdP) is a 501(c)(3) nonprofit organization which operates a main service center in Chamblee, Georgia with a full-time staff providing programs and services and 73 local chapters (“Conferences”) across the state staffed by volunteer caseworkers. The Conferences respond to requests for assistance without consideration of race, creed, gender identification, religious or non-religious affiliation, or other status. Focusing on three primary program areas – Hunger, Housing and Health – SVdP provides a spectrum of safety net services to give both immediate help and empower neighbors for a self-sufficient future. SVdP maintains over forty community food pantries across the state, including a flagship pantry in Chamblee that resembles a grocery store. The housing programs include the [Motel to Home](#) program, transitional housing, rental assistance, and motel assistance. SVdP launched a free community [pharmacy](#) in Georgia in 2021, which fills over 2,000 prescriptions per month. There are currently nine thrift stores in operation and an e-commerce store. In 2023, SVdP served more than 190,000 neighbors in need in Georgia, providing \$24,800,000 in programs and service delivery.

The mission of St. Vincent de Paul Georgia (SVdP) is to provide help and hope to neighbors in need. The Society of St. Vincent de Paul was established in France in 1833 and in the United States in 1845 and has been operating in Georgia since 1903. Over the past 121 years, SVdP has grown to become one of the oldest, largest and most trusted statewide social services safety net organizations in Georgia.

SVdP’s Conference at Christ our King and Savior Catholic Church (SVdP COKAS) is located in the Project Area. SVdP COKAS forms the hub of this project. SVdP COKAS serves neighbors in Greene, Putnam, and Hancock Counties in coordination with the statewide office based in Chamblee. Volunteer caseworkers at this Conference conduct “home visits” to provide aid and comfort to their neighbors in need and to better understand their circumstances and struggles. SVdP COKAS is aware of the blighted condition of the existing manufactured housing stock for extremely low-income neighbors and provides financial counseling, rental assistance, motel assistance, and groceries. In 2023, SVdP COKAS assisted 785 families with financial needs as a direct result of their excessive housing cost burdens, providing \$117,684 in direct assistance for utilities, \$96,933 for rent and housing, and \$89,582 for other needs, such as healthcare and transportation. SVdP COKAS also helps support Martha’s Closet, a clothing ministry in Greensboro, with volunteers and contributions of funding and food. SVdP COKAS is supported by SVdP’s statewide free pharmacy, Motel to Home program, food pantry resources, and Benefits Navigators (to access childcare subsidy, TANF, Social Security benefits, Medicaid, and health insurance.)

Disaster Services Corporation (“DSC”) is a wholly-owned subsidiary of the Society of St. Vincent de Paul USA and operates as the disaster relief arm of the Society. DSC can provide consulting services to SVDP to ensure our MHC is resilient to natural disasters and disaster readiness training to MHC staff and residents. DSC has extensive knowledge and experience in disaster preparedness and disaster recovery and engages in contracts with the Federal Emergency Management Agency (FEMA), other federal agencies, state and local governments, and private foundations to provide programs and services to support SVDP Councils and Conferences before, during and after natural disasters.

Project Description:

Our Project has two components:

(1) Creation of a new, quality, multifamily rental MHC community with 30 years or more of long-term affordability in the Project Area for up to 60 households. This MHC will provide new, resilient, high-quality manufactured homes for both extremely low income (ELI) and low-to-moderate income (LMI) households. The rural Project Area has a high need and land use capacity for this community, which can serve protected populations that have historically been harmed by lack of investment and inequitable practices, such as discrimination in rental housing, lack of accessible housing for disabilities, redlining, and maintenance and quality issues. The MHC will have amenities and resident governance. It will be managed by a third-party management company and owned by SVdP to achieve long-term affordability, MHC quality, and the Vision of the Project.

(2) A Homeowner Loan Program (HLP) for approximately 75 LMI neighbors with an average projected \$40,000 per unit grant contribution to purchase a manufactured home and site or replace their aged manufactured home when it is outdated and cannot be repaired or weatherized. This loan product reshapes market dynamics by enabling homeownership to LMI households, including protected classes historically harmed by lack of investment, disinvestment, and discriminatory lending. In partnership with a local bank, it provides a loan term of 15/30 years based upon national mortgage rates and a borrower downpayment of 5% of the cost of the manufactured home. The total housing burden percentage, including the loan payment, taxes, and insurance, will not exceed 30% of borrower’s income for the entirety of the HLP. SVdP will place a 0% second mortgage upon the properties to recoup proceeds from any sales of the homes or land to support additional loans to be made under the program.

Project Vision:

To leverage the infusion of federal subsidy for broadest and most significant impact in the distressed Project Area; this is achieved with a dual approach to benefit ELI and LMI households and leveraging community partners and institutions. SVdP will create a vibrant and healthy rental MHC community and provide an innovative financing loan to enable mobile home ownership to households that would otherwise not have the opportunity. The MHC will provide up to 60 high quality, new rental homes with long-term affordability of 30+ years for ELI and LMI neighbors and voluntary wrap-around supportive services. The HLP will provide loans to LMI neighbors to purchase their own manufactured home and site or replace their outdated

manufactured home if it is not repairable. Both activities provide deep affordability and will serve numerous households, thoughtfully countering the inequity that has harmed protected classes in the Project Area and improving intergenerational wellness. The HLP is innovative and replicable across Georgia and the country.

Long Term Affordable Solutions to Improve LMI Households:

The proposed activities meet the National Objective of benefiting LMI households by reducing blight, creating safe, healthy homes to improve conditions for LMI households living in blight, and provide long-term affordable solutions to the housing crisis in these rural communities. The project leverages partnerships with local non-profits, community organizations, and government agencies to achieve this objective. The data on increased waiting lists for affordable housing and the current blighted MHC illuminate the urgent need for this Project in the Project Area.

Our Innovative Approach to Affordable Housing for both ELI and LMI Households:

This project braids new construction multifamily rental and homeownership with extensive community partnership and engagement. SVdP submits a cohesive strategy for advancing affordable housing for both ELI and LMI neighbors. SVdP also created an innovative HLP which is replicable and leverages the existing traditional loan infrastructure of the local bank. Additionally, the integration of modern infrastructure improvements, such as broadband installation and energy-efficient utilities, set this project apart. Our focus on resilience activities to mitigate environmental threats ensure the long-term sustainability and safety of the housing units.

Project Area:

The Project Area is Greene, Putnam and Hancock counties in Georgia. These counties are primarily rural and are located approximately 75 miles east of Atlanta in “Middle Georgia.” Of the nine census tracts in the Project area, seven meet the poverty rate “Distress Criteria” and five meet the “Median Income Distress Criteria” pursuant to 12 CFR 1805.201(b)(3)(ii)(D). All nine meet the “Unemployment Distress Criteria” and two meet the “Population Loss Criteria.” A census tract in Hancock County meets *all* distress criteria. The population of the three counties, together, is approximately 50,000. The diverse land uses of the Project Area include conservation areas, farmland, rural residential, transitional residential, residential subdivisions, small urban areas, country clubs with golf courses, restaurants, and lake recreational areas.

Long Term Infrastructure for ELI and LMI Households: The MCU and HLP provide profound *generational* impact: improved health outcomes, educational stability, workforce opportunity and job stability, safety and security, community engagement, and overall quality of life. Children who grow up in safe, healthy, stable housing are more likely to have better health, education, and economic outcomes as adults. The MHC increases long-term infrastructure for ELI and LMI households in proximity to transportation and job opportunities. Additionally, the integration of modern infrastructure improvements, such as broadband installation and energy-

efficient utilities, also inures generational wellness and benefits the Project Area. The focus on resilience activities to mitigate environmental threats ensures the long-term sustainability and safety of the housing units. The HLP provides a primary way for LMI neighbors who otherwise would not qualify for homeownership to build wealth and equity, while providing affordable, predictable housing costs. The community benefits from providing equitable opportunities for housing and jobs and the resultant economic growth, improved health and safety, stronger social networks, and improved social equity.

Equitable Impact:

The MHC will align with HUD's affordability requirements by incorporating the HOME Investment Partnership Program affordability standards, which provides homesite renters will pay no more than 30% of gross income on housing costs, including site rental and utilities. The MHC's period of affordability will be at least 30 years. Restricting the income eligibility for the HLP to households that earn less than 80% of AMI will ensure affordability is maintained for the duration of the Program. Since the ELI and LMI population in the Project Area is disproportionately composed of households in protected classes, this Project will, by design, serve an underserved and racially diverse population. This provides ELI and LMI neighbors equitable access to vital resources in the Project Area, such as quality schools, healthcare, and public transportation, and ensures that safe, healthy housing is accessible to all.

Exhibit B – THRESHOLD REQUIREMENTS and Other Submission requirements

SVdP and its partner organizations meet each of the threshold requirements in Section III.D. of the PRICE Notice of Funding Opportunity.

III.D.1: Resolution of Civil Rights Matters: There are no civil rights matters or unresolved civil rights matters.

III.D.2: This application will be submitted timely to the grants.gov portal.

III.D.4. The applicant, SVdP, is a 501(c)(3) non-profit organization and eligible to apply for this grant opportunity.

III.D.4. SVdP hereby applies for the PRICE Main category with this application.

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Exhibit C – PROJECT AREA NEED

SVdP is applying for the Main category of funding to address the dire need in the Project Area for safe, healthy affordable rental housing and homeownership.

Project Area and the Need for Affordable Accessible Housing Within It: The project area encompasses Greene, Putnam, and Hancock counties in Georgia. These counties are primarily rural and are located approximately 75 miles east of Atlanta in “Middle Georgia.” The population of these three counties totals 49,814.¹

Population Demographics	Greene	Putnam	Hancock	Total #	Total %
White	10,007	13,112	2,358	25,477	51%
Black or African American	5,810	5,419	6,028	17,257	35%
American Indian and Alaska Native	37	83	25	145	0%
Asian	174	108	37	319	1%
Native Hawaiian and Other Pacific Islander	4	1	1	6	0%
Some other race	705	622	23	1,350	3%
Two or more races	889	1,145	200	2,234	4%
Hispanic	1,289	1,557	63	2,909	6%
Total Population	18,915	22,047	8,735	49,697	100%
Other Data					
Housing Units	10,087	13,032	4,896	28,015	
Manufactured Housing Units \$	1,455	4,210	1,365	7,030	
Manufactured Housing Units %	14%	32%	28%	25%	
Median Household Income	\$77,527	\$60,825	\$31,767	62,075	
Poverty %	12.7%	16.0%	27.5%	16.8%	

Data from the U.S. Census, American Community Survey (2018-2022)

Data from the 2023 Georgia Department of Community Affairs Housing Needs Assessment shows that Georgia households earning less than \$25,000 a year accounted for 33% of all renter-occupied households, and race and ethnicity disparately impact housing stability in Georgia.² Black and Hispanic households have lower median incomes than White and Asian households and Georgians who identify as Black or African American are more likely to experience homelessness. In 2021, Black or African American individuals represented 30.8% of the statewide population and 77.6% of people experiencing homelessness. The proportion of

¹ U.S. Census, American Community Survey (2018-2022) and Small Area Income Poverty Estimates

² [ga_housing_needs_assessment_2023.pdf](#)

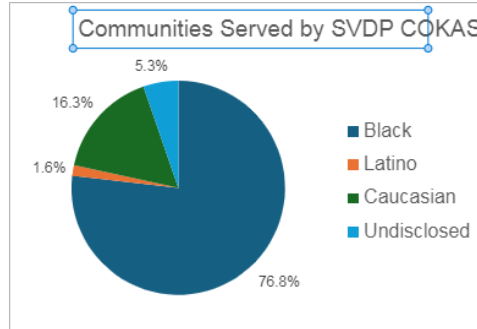
Georgians over the age of 55 experiencing homelessness increased from 20% in 2018 to 23% in 2021 with a larger share of those individuals being over age 65. Georgia’s poverty rate of 14.3% in 2020 was above the US rate of 11.4%. While the top four employment sectors in Georgia pay some of the lowest wages, median gross rent continues to rise. The deeply inadequate supply of affordable, accessible housing is especially harming the lowest income renter households who have the fewest resources and are the most vulnerable to housing instability as higher earners look down-market to find housing. This torrent of contributing factors – high rates of poverty, low income, high unemployment and population loss, income disparity, older adults experiencing homelessness, declining employment, low wages, increase in rents, and the inadequate supply of housing – swelled into the housing crisis in our project area.

In the Project Area, the findings are starker. The Greene County 2019-2020 Comprehensive Housing Affordability Strategy (CHAS) found 31% of households with a 30%-50% cost burden, 27% with greater than 50% cost burden, and 14% with greater than 80% cost burden. Only 28% of households in Greene County have less than 30% cost burden for their housing. Further, nearly one in four (23%) households in Greene County have one or more of the following severe housing problems: lack of a complete kitchen, lack of complete plumbing, more than one person per bedroom, a cost burden of more than 30%. In 2024, GCFC’s Housing and Homeless Strategy Team, supported by SVdP COKAS, conducted surveys of apartments in Greene County with waiting lists for 2022 and 2023. The data illuminates a dramatic increase in the number of families on the wait lists.

<u>Apartment Summary – Greene County Ga.</u>	# of Units	# of Families Wait List 2022	# of Families Wait List 2023
Union Point Housing Authority (HUD)	61	24	36
Fox Chase I	109	92	180
Greensboro Housing Authority (HUD)	246	39	89
	<hr/> 492	<hr/> 155	<hr/> 305

The GCFC Strategy Team surveyed landlords and on-line sources for other possible alternative housing solutions, including Habitat for Humanity Homes, RV Communities, Manufactured Housing, Distressed Properties to Rehabilitate. The result of these surveys revealed extremely limited housing solutions for LMI families.

These findings mirror the difficulty encountered by caseworkers with SVDP COKAS searching for housing for neighbors in need. Caseworkers at SVdP COKAS routinely encounter households who must make the decision of whether to buy food, pay their light bill or pay their rent. In 2023, SVDP COKAS helped 785 families with financial needs due to excessive housing cost burdens. The demographic makeup of the families served by SVDP COKAS is shown in the graph below.



The demographic makeup of those served by SVdP in each of the Counties in the Project Area, as well as throughout the state of Georgia, is shown in the table below.

Ethnicity of HoH	Case Count					Assistance Value				
	Greene	Hancock	Putnam	Tri-County	Georgia	Greene	Hancock	Putnam	Tri-County	Georgia
Black	242	178	121	541	16094	\$81,893	\$56,167	\$33,981	\$172,042	\$6,106,280
Caucasian	61	12	42	115	7122	\$19,142	\$3,011	\$17,130	\$39,283	\$2,836,341
Undisclosed	16	8	12	36	2377	\$4,821	\$2,798	\$3,199	\$10,819	\$781,215
Latino	8	1	2	11	5183	\$2,423	\$526	\$681	\$3,630	\$1,436,494
Asian			1	1	226			\$450	\$450	\$73,275
Native American					63					\$17,707
Pacific Islander					28					\$15,311
Mixed/Other					634					\$254,834
Totals	327	199	178	704	31727	\$108,280	\$62,503	\$55,441	\$226,224	\$11,521,457

Ethnicity of HoH	Case Count					Assistance Value				
	Greene	Hancock	Putnam	Tri-County	Georgia	Greene	Hancock	Putnam	Tri-County	Georgia
Black	74.0%	89.4%	68.0%	76.8%	50.7%	75.6%	89.9%	61.3%	76.0%	53.0%
Caucasian	18.7%	6.0%	23.6%	16.3%	22.4%	17.7%	4.8%	30.9%	17.4%	24.6%
Undisclosed	4.9%	4.0%	6.7%	5.1%	7.5%	4.5%	4.5%	5.8%	4.8%	6.8%
Latino	2.4%	0.5%	1.1%	1.6%	16.3%	2.2%	0.8%	1.2%	1.6%	12.5%
Asian			0.6%	0.1%	0.7%			0.8%	0.2%	0.6%
Native American					0.2%					0.2%
Pacific Islander					0.1%					0.1%
Mixed/Other					2.0%					2.2%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%

The Project Area is Composed of Communities that meet Distress Criteria:

The Project Area is composed of “Distress Criteria” communities pursuant to 12 CFR 1805.201(b)(3)(ii)(D). There are nine census tracts in the Project Area. Seven of them meet the Poverty Rate Distress Criteria and five meet the Median Distress Income Criteria. All nine meet the Unemployment Distress Criteria and two of them meet the Population Loss Criteria. One census tract in Hancock County meets all distress criteria.

County	Census Tract	Poverty Rate >20%	Median Income Pct < 80%	Unemployment Rate >1.5 National Avg	Population Loss > 5%	Population
Greene	950303	42.00	55.89	7.8	No	4247
Greene	950200	38.50	69.45	6.3	No	2153

Greene	950100	20.60	94.49	9.6	No	2270
Greene	950400	23.00	68.51	7.0	No	1325
Greene	950500	7.90	120.64	4.5	No	1400
Putnam	960201	30.60	89.62	2.1	No	1147
Putnam	960202	27.20	79.31	6.8	No	7126
Hancock	480400	38.30	53.31	14.1	Yes	6586
Hancock	480300	13.90	84.7	15.5	Yes	2295

The Project Increases Resilience in a Disaster-prone Area:

The Risk Index Map created by FEMA identifies risk areas for climate hazard risks including heat waves, hail, hurricanes, tornados, etc. as well as social vulnerabilities. While the hazard risk of natural disasters or extreme weather in the project area is very low, the Social Vulnerability Risk levels in the project area due to high poverty levels, low income, high unemployment and population loss are Very High and Relatively High as shown in the chart below:

National Risk Index - Social Vulnerability

	Score	Rating
Greene County Census Tracts		
950305	93.7	Very High
950200	86.5	Very High
950400	76.8	Relatively High
950100	69.0	Relatively High
Hancock County (entire county)		
	90.2	Very High
Putnam County Census Tracts		
960201	87.2	Very High
960203	85.5	Very High
960204	81.8	Very High

Hancock County does not have an urgent care or hospital and ranked 159th of 159 counties for health in Georgia in the 2023 County Health Rankings & Roadmaps (CHR&R),³ a program of the University of Wisconsin Population Health Institute.⁴ Greene County and Putnam County

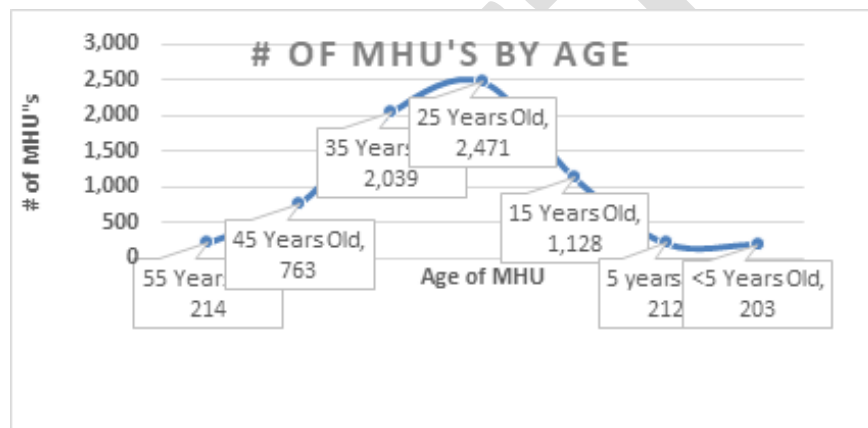
³ <https://www.countyhealthrankings.org/health-data/georgia/data-and-resources>

⁴ <https://www.countyhealthrankings.org/about-us>

each have hospitals and additional healthcare options. Creating a quality, deeply affordable MHC in Greene County in proximity to a healthcare provider will provide access to healthcare.

Status of Manufactured Housing in the Project Area:

There are 28,015 housing units in the project area. 7,030 of those housing units are manufactured housing, which represents 25% of the housing stock, a significant source of housing in the Project Area. The manufactured homes that are built today are state of the art, energy efficient, with insulation and HVAC systems that have an “Energy Star” rating. That is not the case with most of the manufactured housing stock in the Project Area: 78% (5,487) of the manufactured homes are over 25 years old and 43% (3,016) are over 35 years old. (Source: 2024 County Tax Record data for Greene, Putnam & Hancock counties.)



The building standards that were in place when these homes were built were not designed for these homes to last 20+ years and SVdP COKAS caseworkers routinely visit neighbors in need living in deplorable conditions. These first-hand experiences motivated this application and the desire to provide immediate rental housing and a homeownership opportunity; these conditions underlie the reason a PRICE grant award is so valuable to the Project Area.

The Barriers to Manufactured Housing Preservation or Revitalization in Our Project Area:

The project area comprises some of the poorest areas in the state of Georgia. The municipal government and counties do not have adequate funding for affordable housing or homelessness resources. The project area is in the Balance of State Continuum of Care, which contains 152 of Georgia’s 159 counties. Sparta, in Hancock County, is consistently listed as one of the highest poverty cities in Georgia and ranked as the 3rd poorest city in 2022 based on median household income, population, poverty, and unemployment data⁵. There is a racial disparity in this poverty fomented by a history of segregation, lack of opportunity, ethnically concentrated areas of

⁵ [These Are the Poorest Counties in Georgia - 24/7 Wall St. \(247wallst.com\)](https://www.247wallst.com)

poverty, and rental and mortgage discrimination. Of those living in poverty or close to the poverty line, households suffer uninhabitable living conditions, and many are trapped in unsafe, dilapidated manufactured housing in areas without public transportation or job opportunities.

These conditions contrast with the diverse land uses in the area, which include conservation areas, farmland, rural residential, transitional residential, residential subdivisions, small urban areas, country clubs with golf courses, restaurants, and lake recreational areas. There are areas in the Project Area that desperately need affordable housing developments that can provide access to transportation, employment, sewer and water infrastructure, and Internet service.

The barrier to creation of safe, suitable, affordable housing for those in need in the Project Area has been a lack of capital to fund new development or preservation activities. While the Counties' comprehensive plans mention the need for affordable housing, they do not create concrete action items or identify any funds to be used or target areas for new development or affordable housing preservation. Hitherto, there has not been this opportunity for non-profits, such as the undersigned applicant, to apply for an infusion of federal funding to activate these housing goals in partnership with the municipalities. The Project Area does not have a precedent of financing opportunities for LMI homeowners to purchase manufactured housing or a precedent of resident organizing or self-governance in multi-family rental properties. Until HB 404 was enacted in the 2024 legislative session, there was no requirement in Georgia for a tenancy to be "habitable." The biggest barrier is continued lack of investment and blight to ELI and LMI neighbors in the Project Area, especially harming protected classes (race, disability status, age) living in existing blighted MHC.

Land and construction costs have inflated in previous years but land costs to create a MHC in the Project Area are affordable within the scope of the PRICE grant opportunity. Insufficient infrastructure (sewer, water, power, internet service) is widespread within the Project Area, but the applicant's proposed MHC must be located in proximity to transportation and potential employment and would therefore be in an area with infrastructure or will improve the municipality's infrastructure with additional expansion and development. An award from this grant will provide the much-needed infrastructure.

Exhibit D – SOUNDNESS OF APPROACH

Vision and Goals:

We provide a two-pronged approach to advance affordability and equity for ELI and LMI households by creating a safe, healthy, affordable MHC and providing the opportunity for homeownership or continued homeownership with an innovative loan product that pairs with traditional bank financing. SVdP's housing will be resilient and high-quality, with long-term affordability. It will mitigate environmental threats, including socioeconomic threats, and engender transformative, intergenerational benefit to the households served. The loan program is replicable in communities nationwide.

Eligible Activities to Address the Needs described above:

Activity 1: Development of an MCU

SVdP will develop a quality, multifamily rental MHC community with long-term affordability in the Project Area. The MHC will provide resilient, high-quality homes for both extremely low income (ELI) and low-to-moderate income (LMI) households. The rural Project Area has a high need and land use capacity for this community, which can serve protected populations that have been harmed by lack of investment and inequitable practices. The MHC will have amenities and resident governance. It will be managed by a third-party management company and owned by SVdP to achieve long-term affordability, MHC quality, and the Vision of the Project. The MHC will comply with the zoning laws in all three counties in the project area. We believe that with the injection of these funds, we will be able to provide the infrastructure needed, (primarily water and sewer) and that the City and County government officials will embrace this initiative. The MHC will have a clubhouse for residents to host community events and where SVdP, Greene County Family Connection (GCFCP), and other nonprofit partners can provide voluntary wrap-around supportive services to MHC residents. The MHC will have a stone or brick entrance edifice, paved streets and parking, street lighting, and landscaping. There will also be a playground for children in addition to the community clubhouse.

MHC: Eligible Activities that Address the Needs of the Project Area:

- Manufactured housing development activities (III.F.2.c.iii and III.F.2(d))
- Financing the acquisition or installation of affordable, accessible housing (III.F.2.c.iii(a))
- Acquiring land or real property for the development of affordable housing (III.F.2.c.iii(b))
- Acquisition of affordable manufactured housing units ((III.F.2.c.iii(f))
- Development or improvement of infrastructure to support MHCs and manufactured units (III.F.2.c.ii)

- Installing new utility lines, utility hookups, or other necessary improvements. (III.F.2.c.ii (a))
- Upgrading existing utilities or improvements. (III.F.2.c.ii (b))
- Enhancing the resilience of infrastructure to natural hazards, extreme weather, and disaster events; this may include, but is not limited to relocating, burying, elevating, or hardening infrastructure and installing community based solar energy. (III.F.2.c.ii (c))
- Installing or upgrading broadband infrastructure. (III.F.2.c.ii (d))
- Acquiring, constructing, reconstructing, rehabilitating, or installing public facilities and improvements such as roads, pads, sidewalks, curbs and gutters, parks, playgrounds, water and sewer lines, wells, septic tanks, flood and drainage improvements, fire breaks, parking lots, etc. (III.F.2.c.ii (e))
- Conducting mitigation and resilience activities [for the MHC] that address the rising threat that extreme weather events, such as extreme heat or cold, present to manufactured housing or MHCs, including roof ties, elevation of structures, insulation, fire breaks, stormwater systems and drainage, cooling / heating upgrades, tornado and storm shelters, landscaping with native plants, shade trees, or other green infrastructure, etc. (III.F.2.c.iv(b))
- Conducting mitigation and resilience activities that address human-caused risks that can impact manufactured housing or MHCs, which may include but are not limited to risks associated with the use or release of toxic materials, with uses that create pollution generally, and with activities that involve land disturbance that may inadvertently impact surrounding properties (e.g., fracking). (II.F.2.c.iv(c))
- Eviction prevention assistance (providing rental arrears) (III.F.2.c.v(c))
- Support to establish resident self-governance in MHCs (III.F.2.c.v(e))
- Program income generated from the use of PRICE awards can be used for operating and maintenance expenses for public facilities, improvements, and services funded by PRICE awards ((III.F.2(f))

Activity 2: Homeownership Loan Program (HLP)

A Homeowner Loan Program (HLP) for 75 loans at a projected grant contribution of \$40,000 per unit will allow LMI neighbors to purchase a manufactured home and site, or replace their aged, unrepairable manufactured home. This loan product reshapes market dynamics by enabling homeownership to LMI households, including protected classes harmed by lack of investment, disinvestment, and discriminatory lending. In partnership with the local bank, it provides a loan term of 15/30 years, interest rate based upon national mortgage rates, borrower downpayment of 5% of the cost of the housing unit, with a total housing burden percentage (including the loan payment, taxes and insurance) ***not to exceed 30% of borrower's income***. The program will cap the builder fee at 15% of the total lot and development costs, and SVdP will place a 0% second

mortgage upon the properties to recoup funding from any sales of the homes or land, in order to support additional loans to be made under the program.

HLP: Eligible Activities that Address the Needs of the Project Area:

- Financing the acquisition or installation of affordable, accessible housing (III.F.2.c.iii(a))
- Assisting manufactured housing renters and homesite renters seeking to become homeowners with land and site acquisition (III.F.2.c.iii(d))
- Establishing or building the capacity of a non-profit entity to carry out innovative financing strategies for manufactured housing. (III.F.2.c.iii(i))
- Conducting manufactured housing resilience activities, which include the ... replacement of manufactured housing... to enhance safety and stability in the face of weather-related hazards. (III.F.2.c.iv(a))
- Downpayment assistance, homebuyer education, and appraisal programs (III.F.2.c.iv(d))

The Project Meets the National Objective of Benefiting LMI persons with Long-Term Solutions for Sustainable Homeownership:

The proposed activities benefit LMI households by reducing blight, creating safe, healthy homes for LMI persons currently living in blight, and providing long-term affordability to the housing crisis in these rural communities. The MHC provides long-term affordability for 30+ years. The HLP advances sustainable homeownership by encouraging manufactured home and site acquisition, which provides stability to tenants and homesite-renters of manufactured homes. The project leverages partnerships with local non-profits, community organizations, and government agencies to achieve this objective. The data on increased waiting lists for affordable housing and the current blighted MHC illuminate the urgent need for this Project in the Project Area. The HLP reshapes market dynamics by enabling homeownership to LMI households, including previously precluded protected classes. By making housing and financing accessible to marginalized groups, the Project promotes inclusivity and equity. The Project's resilience activities to mitigate environmental threats meet the long-term sustainability and safety objectives.

The Project Innovatively Advances Equity, Enabling Affordable Homeownership to Achieve Long-Term Financial Growth:

This project adopts an innovative approach by braiding new construction, preservation, and homeownership with extensive community partnership and engagement. The applicant submits a cohesive strategy for advancing affordable housing and provides this assistance directly, in alignment with its nonprofit mission. SVdP's Project addresses multiple aspects of housing

insecurity, from providing immediate shelter to enabling long-term financial growth. Additionally, the integration of modern infrastructure improvements, such as broadband installation and energy-efficient utilities, set this project apart.

Affordability and Equity:

The MHC will align with HUD's affordability requirements by incorporating the HOME affordability standards. We will ensure that all units created in the MHC remain affordable for at least 15 years, as mandated by HUD. The intention of SVdP is permanent affordability, in alignment with its nonprofit mission. This will be achieved in the MHC by infusing PRICE grant capital into the development to enable affordable rents in the budget. SVdP can also seek to obtain project-based rental assistance vouchers for the MHC and will accept tenant-based vouchers on units that do not have PBRA.

To promote homeownership for LMI households, restricting the income eligibility for the HLP to 80% or below of AMI will ensure affordability is maintained for the duration of the Program. The HLP enables the homebuyers to accrue equity and if they sell the home for a profit, they earn wealth and the loan amount provided by the grant funds will be received back by SVdP via its second mortgage on the property and becomes available for use for the next loan recipient.

A new MHC and an innovative affordable loan program, together, create a comprehensive approach to building community resilience. The Project provides stable affordable housing, promotes economic and social stability, enhances health and safety, and fosters an inclusive, engaged Project Area.

Access to Resources and Financing, especially for underserved communities and persons:

The MHC ensures up to 60 ELI and LMI households will have safe, accessible, and quality rental homes that have been thoughtfully designed and constructed to combat climate and socioeconomic threats. The MHC is ideal for neighbors currently living in poverty, lacking a vehicle, or living in an overcrowded home. The MHC will connect residents with voluntary caseworker assistance from SVdP, transportation, and access to healthcare and necessary amenities. The HLP is tailored for LMI households who are priced out of traditional homeownership opportunities. The HLP is likely their only opportunity to replace their aged, unhealthy manufactured home or to have an opportunity to become a homeowner. Since the ELI and LMI population in the Project Area is disproportionately composed of households in protected classes, this Project will, by design, serve an underserved and racially diverse population.

The Project's Outreach to Low-Income individuals:

SVdP and its community partners will market the MHC and HLP extensively to ELI and LMI households and protected classes, conducting outreach through local community organizations, social media, and housing fairs to ensure broad awareness and access. Currently, SVdP COKAS helps operate a thrift store in Sparta, Hancock County, Georgia, "Martha's Closet," which provides food, clothing, household items, appliances, and furniture to over 100 underserved households each month. Martha's Closet will be a primary vehicle to engage the community, solicit input, and affirmatively market the Project to community members.

SVdP's 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:

SVDP has a long-standing commitment to creating economic opportunities for low-income individuals. Our extensive philanthropic work and strategic partnerships enable us to implement programs that offer significant benefits to the communities we serve. This project will continue and expand these efforts, aligning with 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.

Economic Opportunities for Low-Income Individuals:

SVdP has a robust history of providing employment and training programs tailored to the needs of low-income individuals. The MCU's development, construction, and operation and the Homeownership Loan Program will generate numerous job opportunities in construction, maintenance, and administration. SVdP will prioritize hiring local low-income individuals, ensuring they benefit directly from the project. SVdP will provide voluntary workforce development services to MCU residents to assist with job acquisition and upskilling.

Environment and Resilience:

Significant hazards that could impact the Project Site(s), with our activities to address the current and future threat of natural hazards, extreme weather, and disaster events:

Both the MHC and the individual MHU purchased using the HLP are subject to current and future threat of natural hazards, extreme weather, and disaster events. "The Manufactured Home Community (MHC) - A Detailed Scope", below, sets forth the comprehensive resilience plan for the MHC.

For both the MHC and the HLP, every MHU developed by the Project will be built to HUD certification requirements construction standards and National Fire Protection Association

(NFRA). This applies to the 60 new MHU in the MHC and each new or replacement MHU purchased using the HLP. This includes:

- MHUs will be selected based on their ability to withstand the specific climatic and environmental conditions of the Project Area.
- MHUs will have the ENERGY STAR label.
- MHU will use concrete block piers for foundations and structural supports. Each MHU will also have full length outriggers/wall supports which offer superior strength and durability against high winds, floods, and seismic activities. A concrete block with stucco style exterior will be used for underneath skirting to provide a sound structural base and a beautiful exterior look.
- Quality wood (2x4 timber) will be used for framing, with 2x6 floor joists 16” O.C. Tongue & Groove OSB is used for floor decking. These materials are not only strong and durable but are the same quality materials used for all traditional residential homes in this climate zone.
- Roofing and Siding Materials: Composition Shingle Roofing will be used for its high resistance to extreme weather conditions, including high winds, hail, and fire. It also reflects sunlight, reducing heat absorption and cooling costs.
- Siding Materials: Composite “Smart Panel” siding is highly durable, resistant to fire, termites, and rot, and can withstand extreme weather conditions. It is an ideal choice for enhancing the exterior resilience of homes
- Insulation and Energy-Efficient Materials:
 - Spray Foam Insulation: Spray foam roof insulation, R-21 provides excellent thermal resistance, reduces air infiltration, and is effective in sealing gaps and cracks, enhancing the energy efficiency of homes. Side walls and floors are installed with R-11 level insulation to provide a complete insulation seal for the structure.
 - Reflective Insulation: A radiant OSB barrier is used to reduce heat gain in our homes, which is particularly important in areas prone to extreme heat.
 - Ducted Mini-Split System – Our homes use state-of-the-art ducted mini-split systems featuring an impressive high energy-efficient rating certified to cut energy consumption by 65%.
- Windows and Doors
 - Vinyl Thermal Pane Low-E Windows to minimize cold drafts and effectively ward off excess solar heat during the summer.
 - Energy-Efficient Doors: Doors with high insulation values and weatherstripping will be used to prevent air leaks and enhance thermal performance. Factory-Select 34” Steel-In-Swing Front door with deadbolt and Rear Door with deadbolt.
- Water Heater – Heaters that average 70% less energy consumption.
- Smart Thermostat – The smart thermostat automatically fine-tunes the home’s temperature, aligning to preferences and championing energy efficiency.

Also, SVdP has a standing Disaster Committee (DSC) to mobilize resources, in conjunction with an affiliate DSC, in the event of natural or man-made disasters. Rapid response teams can provide immediate assistance to LMI households in the aftermath of disasters, helping with debris removal, minor repairs, and connecting them to recovery resources. DSC caseworkers are trained to provide long-term support and housing relocation assistance. DSC is currently providing such services to the victims of natural disasters around the country as a FEMA contractor. DSC can also connect neighbors with voluntary counseling and support services to address the emotional and psychological impacts of disasters, aiding in the overall recovery process.

Commitment to Advancing Environmental Justice:

The Project aligns with the principles of Environmental Justice, addressing the needs of environmentally underserved and overburdened communities.

The MHC provides the following advancements, and the HLP enables homeowners the opportunity to replace an existing, unhealthy manufactured home with a new one. The HLP also enables a first-time homebuyer to purchase a new manufactured home that meets quality control standards. In both activities, the community need for environmental justice is served. Detailed plans are set forth, below, in “MHC- a Detailed Scope” and “HLP- a Detailed Scope.”

Community Engagement and Support:

SVdP has a 4-point community engagement plan:

1. SVdP will widely circulate the link to the draft application materials and public meeting information on SVdP’s homepage, www.svdpgorgia.org. The SVdP homepage gets over 8,000 views each month, with its housing and Motel to Home pages the second most visited pages. Recordings of the meeting (held in person and via zoom) and an additional meeting (via zoom) will be made available on SVdP’s website.
2. SVdP will target the diverse stakeholders impacted by this application, including manufactured housing residents, local government officials, seniors, ELI and LMI households, immigrant communities, manufactured housing developers, banks, builders/general contractors, immigrant communities, and nonprofits.
3. SVdP will leverage nonprofit partner resources to expand communications. Between SVdP’s COKA caseworkers, Neighbors Helping Neighbors, and the Greene County Family Connection communications, approximately 1,400 people in the Target Area are reached and they will each be asked to disseminate the Project information to their networks.
4. SVdP will solicit feedback in person, email, and via mail and be responsive to all feedback through the comment period. SVdP will thoughtfully analyze feedback and incorporate it into the application.

Proposal Alignment with Existing Community Plans and Policies

SVdP's proposal is in firm accordance with the Project Area's Comprehensive Plans and Land and Building Regulations.

The 2023 Greene County Comprehensive Plan⁶ provides, in section 3.3.3 "Housing," that "[t]he desire and need for more housing types, including more affordable housing options, was a recurring theme throughout the planning process for this comprehensive plan update. Local land use policies and infrastructure conditions often hinder the development of affordable housing. In Greene County's case, zoning and development regulations do not pose major impediments; in fact, several code provisions welcome a diversity of housing types. The lack of public sewer infrastructure, however, poses the biggest barrier to affordable housing. Greene County may consider a range of different tactics in the long term, such as continuing to partner with nonprofit community housing development organizations and coordinating with municipalities." Also "In the visioning survey carried out early in the planning process, which garnered responses from 288 people, 72 percent of respondents answered "yes" when asked if Greene County should allow a greater diversity of housing types and price points. The survey also asked for preferences on new housing types, to which the most popular answers were "starter homes on small lots for young families" and "housing options for low-to-moderate income workforce needs." Greene County's Comprehensive Plan seeks to "support residents on the path to homeownership. Homeownership is desirable because it helps owners build equity and supports stable communities."⁷ The Plan also specifies federal funding opportunities, particularly programs focused on the joint goals of affordability and walkability⁸.

The MHC is designed to comply with the Land and Building Regulations in the 3-county Project Area. Greene County has the most restrictive MHC zoning requirements with a maximum of 3.5 homes per acre, as Putnam County allows a maximum of 5 homes per acre and Hancock County allows a maximum of 7 homes per acre. The Greene County Land Use Ordinance requires a minimum MHC size of 10 acres with a minimum individual Lot of 8,900 square feet. Greene County requires a 10 ft. wide driveway connected to an interior street, sufficient width to serve 2 off-street parking spaces, and each home served by individual refuse containers on stands and screened from view. A patio or deck must be a minimum of 96 square feet. Permanent stairs require a 3ft x 3ft landing. Each home must be supported by piers with an enclosed permanent foundation. There is a 10% minimum of a MHC for parks, playgrounds, and/or recreational purposes. Streets must be paved and lighted, with lights at a minimum of 200 ft intervals. The minimum buffer between homes is 20 feet, not included in lot size, the buffer left natural if with trees, otherwise trees to be planted. The MHC must be landscaped with trees and ground covers

⁶ <https://www.greencountyga.gov/DocumentCenter/View/1471/Greene-County-Comprehensive-Plan-2023-PDF> (page 50)

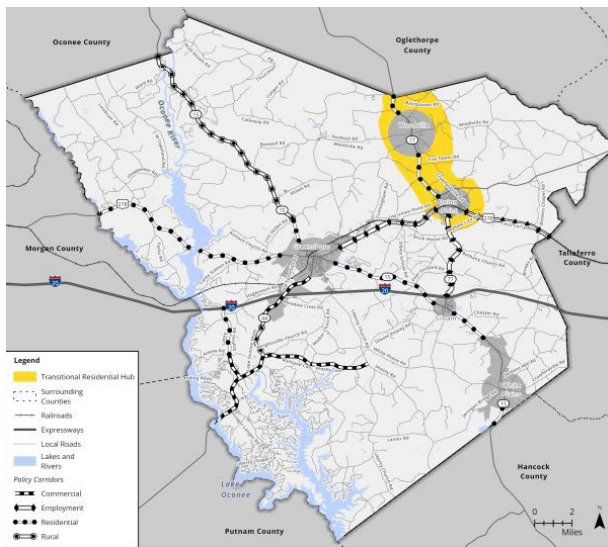
⁷ Id. at p.51.

⁸ Id. at p.33.

and exterior screen plantings. Street improvements must be planned for and provided by the developer. The MHC must be connected to sewer system or utilize a central septic system.⁹

The Manufactured Home Community (MHC) - A Detailed Scope:

MHC Physical descriptions, geography, maps: SVdP will acquire 16 to 25 acres of land or real property for the development of an MHC with 60 manufactured housing units (MHUs), focusing on “Opportunity Zones” and Transitional Residential Hubs located in the Project Area. Securing land in strategic locations in proximity to employment, amenities, and utilities will facilitate the development of affordable housing in areas of opportunity for ELI and LMI households. The Transitional Residential Hub area described in the Greene County Comprehensive Plan is an ideal area for consideration for the MHC.



2023 Greene County Future Land Use Map¹⁰

MHC Impact: Providing 60 MHUs for ELI and LMI tenants creates safe, healthy well-managed housing stock for an underserved population in the Project Area that is facing unhealthy housing and homelessness. The Project Area is a socially distressed area with a disparity of federal, state, or local resources. A nonprofit mission-based MHC enables long-term affordability for the 60+ households that will benefit from their tenancies over the MHC’s lifetime. The MHC also provides a framework for resident self-governance, impacting community decisions that reflect

⁹ Greene County Ord. of 12-8-2020, § 9.3

https://greenecounty.municipalcodeonline.com/book?type=ordinances#name=Sec_9.3_Manufactured_Homes_Parks

¹⁰ <https://www.greencountyga.gov/918/Comprehensive-Plan-Future-Land-Use-Plan>

the collective interests and needs of the residents and increasing engagement. The MHC can serve as a blueprint for more communities to replicate.

MHC Accessibility: Accessibility is achieved by providing long-term affordability at 30% of gross income and by providing MHUs that accommodate persons with disabilities, pursuant to the Americans with Disabilities Act, Uniform Federal Accessibility Standards, and other HUD, federal, state, and local laws. Providing necessary accommodations and accessibility is incredibly important to SVdP and to this Project, and the MHC will be thoughtfully designed so that residents and their guests can enjoy each aspect of the community.

Protections in Place for Residents:

- MHC Resident self-governance: The MHC will foster resident self-governance to encourage a more engaged, empowered, and cohesive community. This enables maintenance and services to be more responsive to the community's needs. It also allows for faster and fairer resolutions to problems that arise and enables resident agency in long-term planning and improvements that benefit everyone.
- Resident's lease agreements will comply with the Federal National Mortgage Association (FNMA) protections to ensure that residents are treated fairly and that their rights are safeguarded. These protections provide stability and security for tenants. FNMA protections include fair lease terms, annual renewal rights at the resident's election unless good cause for nonrenewal exists, a minimum 30-day written notice of rent increases, a 5-day minimum grace period for non-payment of rent, and the right to cure rent payment defaults within the specified cure period (or 10 days if no cure period is specified).

MHC Contractors:

Atlantica Developers Founded in 2010, Atlantica Properties is a vertically integrated real estate development and asset management company with a mission to empower individuals by establishing thriving, holistic communities. Since its inception, the company has achieved success by acquiring and managing assets that produce strong financial returns. With a focus on workforce housing, Atlantica employs hands-on business practices and strong industry relationships to execute on opportunities that produce equitable outcomes. With over 40 years of combined real estate experience, the leadership team at Atlantica Properties is positioned to become one of the premier multifamily brands in the Atlanta market. (Please see additional info in attached Exhibit.)

TI Asset Management, LLC ("TIAM") is a mission-based equitable apartment property management company based in Atlanta, Georgia. Its leadership teams bring a wealth of knowledge and expertise on tenant-led community development to the table. TIAM has extensive experience in institutional asset management, mission-based property management, and finding permanent housing solutions for housing insecure families. One of their key strengths lies in our strong relationships with major stakeholders involved in Affordable Housing initiatives. TIAM has established connections with Partners for HOME, City of Atlanta, Community Foundation for Greater Atlanta, Atlanta Housing, Community Improvement

Districts, Open Doors, private capital providers, and various non-profit organizations. These relationships enable TIAM to foster collaboration, streamline communication, and leverage resources effectively, ensuring seamless coordination among all parties involved. With their expertise, strong stakeholder relationships, and commitment to delivering high quality outcomes, TIAM is confident in their ability to provide excellence in property management. The TIAM team is dedicated to making a positive impact on homelessness and offering well-maintained, safe, affordable housing. (Please see additional info in attached Exhibit.)

MHC Community Partners:

The Greene County Family Connection (“GCFCP”) is a non-profit organization which creates opportunities to educate their partners and the community on the impacts of poverty and health to strengthen support for programs to improve school success. GCFCP is part of Georgia Family Connection, a statewide network of 159 counties committed to improving the quality of life for each child and for families by collaboration throughout Georgia. The Georgia Family Connection is the largest statewide network of community collaboratives in the nation. GCFCP works in collaboration with the school system and Boys and Girls Club.

Neighbors Helping Neighbors (“NHN”) is a non-profit organization in Greene and Putnam Counties founded in 2020 to serve neighbors and provides critically needed home repairs to manufactured homes in addition to other services. NHN primarily serves older adults, children, single working mothers and their children, military veterans, developmentally and/or physically challenged individuals. NHN is a membership organization with approximately 400 members who have pledged a minimum yearly amount of \$400 per member. In 2023, NHN averaged \$750 per member. We also have dozens of volunteers who donate their time. NHN does not track or record this time. NHN focuses on one-time critical home repairs. NHN is currently the only organization tackling the issue of substandard manufactured housing in the Project Area. In 2023, NHN completed 72 projects at a total cost of \$267,000. Almost all of the projects are in two census tracts (9503.05 in Greene County, and 9602.04 in Putnam).

MHC Timeline:

- Site Selection (Month 1 - Month 3) The initial phase of the project involves selecting one or more sites to achieve the project goal. This process will include evaluating potential locations, conducting feasibility studies, and negotiating land purchases or partnerships with Manufactured Home Community (MHC) property owners. Key tasks during this phase include:
 - Identifying potential sites based on strategic criteria such as proximity to community amenities, availability of utilities, and support from local stakeholders.
 - Conducting site assessments and feasibility studies to ensure suitability for development.

- Negotiating land purchases or forming partnerships with existing MHC property owners.
- Conceptual Design (Month 4 - Month 6) Once the sites are selected, the next phase involves conceptual site planning to gain approval for potential land use and zoning changes in the various local jurisdictions. Key tasks during this phase include:
 - Developing conceptual site plans that align with local land use regulations and zoning requirements.
 - Engaging with local planning authorities to review and refine the conceptual plans.
 - Preparing documentation and applications necessary for land use and zoning change approvals.
- Land Entitlement and Public Engagement (Month 7 - Month 10) The land entitlement phase involves applying for land use and rezoning changes to enable the construction of the MHC. This process includes extensive public engagement, as required by each jurisdiction. Key tasks during this phase include:
 - Submitting applications for land use and rezoning changes, if needed, to local authorities.
 - Organizing and conducting public engagement sessions to inform and involve community members in the planning process.
 - Addressing public feedback and concerns to refine the project plans and gain community support.
- Design Development and Construction Documents (Month 11 - Month 14) Following land entitlement, detailed architectural and engineering plans will be prepared. This phase involves developing comprehensive design and construction documents necessary for the construction phase. Key tasks during this phase include:
 - Collaborating with architects and engineers to develop detailed design plans.
 - Preparing construction documents that meet all regulatory and safety standards.
 - Conducting reviews and obtaining necessary approvals from local authorities.
- Construction Permitting (Month 15 - Month 16) With the design and construction documents in place, the next phase involves applying for and receiving permits for construction in the jurisdiction. Key tasks during this phase include:
 - Submitting construction permit applications to relevant local authorities.
 - Addressing any feedback or requirements from permitting authorities to obtain necessary approvals.
 - Securing all required construction permits to commence building activities.

- Construction (Month 16 - Month 24) The construction phase will start after the completion of pre-development and permitting processes. Key tasks during this phase include:
 - Initiating the construction of new manufactured housing units and infrastructure improvements as soon as permits are obtained.
 - Overseeing the construction process to ensure timely completion and adherence to quality standards.

MHC Budget Summary:

The overall project budget for 60 MHU and 16-25 acres on unimproved land is \$8,450,000. This includes appraisals, a leasing office/clubhouse, entrance edifice, playground, and community pavilion. The comprehensive budget includes all project activities necessary to achieve our goals, ensuring that each phase of the project is adequately funded and effectively executed.

MHC Funding Breakdown:

- Land Acquisition: A portion of the budget will be allocated to purchasing land. Securing the appropriate site is critical for the success of the project.
- Purchasing of Manufactured Homes: Funds will be used to acquire new manufactured homes directly from a manufacturer, ensuring high-quality MHUs are available for LMI families.
- Pre-Development Tasks: This includes site assessments, feasibility studies, conceptual design, and public engagement efforts, ensuring that each site is ready for development.
- Site and Utility Infrastructure: Significant investment will be made in developing and improving infrastructure, including utility lines, utility hookups, broadband infrastructure, and community amenities such as roads, sidewalks, parks, and a playground.
- Construction: The PRICE grant will support the construction of new MHUs. This comprehensive funding will ensure that the project meets its objectives of providing safe, affordable housing for LMI families.
- Ongoing Operations Funding: The ongoing operational costs will be sustained through rental revenue generated from the homes. To enhance affordability and support long-term housing stability, this rental revenue can be subsidized by project based rental assistance. These subsidies will ensure that the housing remains affordable for ELI households and operational costs are covered.
- Administrative Items: This includes costs associated with project management, legal fees, permits, and other administrative tasks necessary to ensure smooth project execution.
- Rental Assistance: A portion of the budget will provide rental arrears for emergency rental assistance to ensure ELI and LMI families maintain long-term housing stability.

MHC Funding Sources: The MHC project budget will be funded exclusively by the HUD PRICE award. SVdP does not have matching funding for this project; therefore, the requested grant amount will cover all project activities from inception to completion.

MHC Budget Justification: The budget has been carefully planned to cover all aspects of the project, ensuring that each phase is fully funded and that there are no gaps in financing that could delay or impede progress. By creating new, safe, healthy housing infrastructure for ELI and LMI households and allocating funds to rental assistance and utilizing HUD subsidies, we ensure that the housing remains affordable for the target population.

MHC Support and Sustainability: The MHC's pro forma is in alignment with SVdP's non-profit mission which details the financial sustainability plan to ensure long-term affordability. Because the MHC's affordability is capitalized at the outset and its new MHUs are designed for long-term sustainability, it will not require future federal subsidy. SVdP may seek to acquire project-based housing vouchers from the housing authority for units and will accept tenant-based housing vouchers, but those activities are not necessary to maintain long-term affordability.

MHC - Ensuring the Availability of affordable manufactured housing options to LMI households: The project will leverage the affordability standards set forth by the HOME Investment Partnerships Program ensuring that households pay no more than 30 percent of their gross income on housing costs, including site rental, fees, and utilities. This standard will be enforced through recorded use restrictions, covenants, deed restrictions, or other mechanisms, guaranteeing that the rental housing remains affordable for at least 15 years.

MHC: Environment and Resilience: The MHC is designed to mitigate the impacts of natural hazards, extreme weather, and disaster events. By implementing the following range of proactive measures, we aim to enhance the safety and stability of housing, ensuring long-term resilience and security for residents.

- For tornadoes: Risks of high winds and debris impacts which can severely damage manufactured homes.
 - Structural Reinforcement: We will use advanced building techniques to reinforce manufactured homes, such as anchoring systems and wind-resistant designs, to withstand high winds and debris impact.
- For extreme heat: Health risk, especially for vulnerable populations, and can lead to increased energy consumption and costs.
 - Energy-Efficient Designs: Incorporating energy-efficient building materials and designs, such improved insulation, will help maintain cooler indoor temperatures and reduce energy costs.
 - Shade and Landscaping: Planting trees and creating shaded areas around homes will help reduce heat absorption and improve outdoor comfort, creating a cooler environment for residents.
 - Engineered Wood Products: Engineered wood products, such as “Smart Panels will be used for exterior siding. These materials are not only strong and durable but also provide better resistance to moisture and pests compared to traditional wood.

- For Flooding: Potential for water damage to homes and infrastructure, particularly in areas with inadequate drainage.
 - Elevating Homes: Elevating manufactured homes above the base flood elevation will minimize the risk of flood damage, ensuring that homes remain safe and habitable during flood events.
 - Improved Drainage Systems and Overcoming Prior Disinvestment in Environmental Infrastructure: Developing and maintaining robust drainage systems, including culverts and retention basins, will mitigate the impact of heavy rainfall and reduce the risk of flooding.
 - Utilizing permeable paving materials.
- Wildfires: Although less common in this region, wildfires still pose a risk, especially in areas with dense vegetation.
 - Fire-Resistant Materials: Using fire-resistant building materials for new manufactured homes and retrofitting existing homes with fire-resistant features will reduce the risk of fire damage.
 - Community Fire Safety Plans: Developing and implementing community fire safety plans, including evacuation routes and emergency procedures, will ensure residents are prepared to respond to wildfire threats effectively.
- Erosion: Soil erosion can undermine the foundations of homes and damage infrastructure, particularly in areas with poor soil stability.
 - Erosion Control Measures: Implementing erosion control measures, soil stabilization and stormwater management practices, such as retaining walls, terracing, and vegetative cover, will stabilize soil and prevent erosion by managing runoff.
- Mitigation of Poor Air Quality:
 - Tree Planting and Green Spaces: We will establish green spaces and plant trees to improve air quality by absorbing pollutants and providing oxygen.
 - Energy-Efficient Appliances: Energy-efficient appliances and HVAC systems reduce emissions from home heating and cooling, improving indoor air quality and reducing the community's carbon footprint.
- Addressing Legacy Pollution:
 - Soil Remediation: Conduct soil testing and remediation in areas where former activities may have left contamination. By cleaning up the site, we will reduce residents' exposure to harmful pollutants.
 - Implement safe waste disposal practices and educate residents about the importance of reducing, reusing, and recycling to minimize pollution.
 - Reducing Heat Island Effect: Use cool roofs in building construction to reduce heat absorption.
- Weatherization:
 - Improved insulation for more energy-efficient and extreme weather resiliency.
- Resilience Infrastructure:
 - Fire-Resistant Materials: Use fire-resistant materials in construction and landscaping to reduce the risk of wildfires impacting homes.
 - Floodproofing:

- Elevate homes in flood-prone areas to reduce the risk of flood damage.
- Improved Drainage Systems: Install and maintain robust drainage systems to manage stormwater effectively and prevent flooding.
- Infrastructure:
 - Work with local county governments to provide public transportation options to connect residents with essential services and employment opportunities.
- Green Technology: Each new MHU has smart home technologies that optimize energy use and improve home safety.
- Community Education: Educate residents about maintaining drainage systems and the importance of proper waste disposal to prevent blockages.
- Green Spaces: create green spaces, including a playground, within the MHC to provide resident health, both physical activity and mental well-being.

How your project supports LMI households that may be particularly vulnerable to impacts from weather-related hazards due to difficulties they may face preparing for, responding to, and recovering from disasters. If your project area includes homes that have been subject to repetitive loss, how will your project address and mitigate future losses:

The MHC is designed with a comprehensive approach to support ELI and LMI households, particularly those vulnerable to weather-related and natural hazards. These households often face significant challenges in preparing for, responding to, and recovering from disasters due to limited financial resources, lack of access to information, and reduced mobility. Our strategies aim to address these vulnerabilities through targeted interventions, community engagement, and resilience-building measures.

LMI households are disproportionately affected by weather-related and natural hazards for several reasons, including financial constraints that hinder their ability to invest in necessary preparations, such as reinforcing their homes or purchasing emergency supplies. They may lack access to timely and accurate information about impending hazards and appropriate response measures. They may have reduced mobility- physical or financial limitations can impede their ability to evacuate or seek shelter during disasters. Post-disaster recovery is often prolonged for LMI households due to insufficient savings, limited insurance coverage, and lack of access to recovery resources. To address these challenges, our Project includes these community preparedness programs aimed at enhancing the resilience of LMI households:

- Education and Training: Through SVDP’s partnership with our affiliate DSC, we will conduct regular community workshops and training sessions to educate residents on disaster preparedness, response, and recovery. These sessions will cover topics such as creating emergency plans, assembling disaster supply kits, and understanding evacuation routes.
- Early Warning Systems: Implementing early warning systems and ensuring that LMI households have access to alerts and information in real-time will help them respond promptly to impending hazards.

- **Community Engagement:** We will engage local community organizations and leaders to disseminate information and resources effectively, ensuring that all residents, especially those most vulnerable, are informed and prepared.
- **Social Resilience:** Residents will be supported by partnerships, such as with Neighbors Helping Neighbors, Greene County Family Connection Commission, Inc., the school system, and faith-based and government partners. This voluntary support includes health services, educational opportunity, workforce development, and access to healthy food. Residents will have agency from resident governance to voice their needs and direct policies that best serve their interests.
- Our mitigation strategies are informed by resources and guidelines from the Federal Emergency Management Agency (FEMA), including the National Risk Index and the Resilience Analysis and Planning Tool.

Homeownership Loan Program (HLP)- A Detailed Scope:

HLP Budget Summary: SVdP targets to fund approximately 75 loans for the purchase of new manufactured homes with site, and replacement of aged manufactured homes, in the Project Area. Eligible borrowers can be ELI and LMI with income less than 80% of the median income in Georgia.

The loan amount to each LMI applicant is leveraged with traditional bank financing, with the HLP providing \$25,000-\$50,000 per loan. In partnership with a local bank, the HLP provides a mortgage with a loan term of 15/30 years with interest rates that are commensurate with national mortgage rates. The loan requires a borrower downpayment equal to 5% of the amount of the cost of the MHU.

The HLP debt to income (or total housing burden including loan payment, taxes and insurance) will not exceed 30% of borrower's income. Due to the grant contribution, the loan to cost ratios (LTC) will range from 48% to 76%. It is anticipated that the value of the improved property will be greater than the cost to build and the Loan to Value (LTV) will be lower.

The bank will have the first lien position and SVdP will provide a 0% second lien position from the PRICE grant funding which will provide sufficient equity for the borrower to qualify for the first mortgage loan. SVdP will recoup funds from sales prior to the loan maturity, which will support additional homebuyer loans. In essence, expenditure of PRICE grant funds will be a loan receivable asset. The Bank will service the second mortgage loans for the Grantee.

With \$3,000,000 awarded from the PRICE grant, 75 loans will be originated with grant contributions between \$25,000 and \$50,000. SVdP will place a 0% second mortgage upon each property, to be able to recoup funds from any sales prior to the loan maturity, which will be used to support additional homebuyer loans. The expenditure of PRICE grant funds will be a loan receivable asset on the books of SVDP. The bank will service the second mortgage loans for the Grantee. The total origination amount anticipated by the bank is \$5,250,000 for a combined total of \$8,250,000 in loans made to LMI neighbors in the Project Area, to enable or preserve their

homeownership. MHU costs are based on specific market conditions and desirability factors in the Project Area, for total costs of \$100,000 to \$116,000. depending upon the size of the home.

The HLP leverages PRICE grant funds with private bank funds to finance MHU. At an average participation of \$40,000 in grant funds, the \$3,000,000 grant request can fund 75 loans. The required bank participation at an average loan amount of \$70,000 is \$5,250,000, a leverage factor of 175%. The leverage on an individual loan will range from 100% to 364% depending upon the ratio of outside bank funds to grant funds used in each individual transaction. The grant funds contributed are secured by a 0% second mortgage, such that if the loan pays off prior to maturity, the remaining loan balance will be repaid to SVdP to relend to new participants in the program. This provides an ongoing source of funding to ensure continued funds to provide long term affordability for additional LMI households. Bank partnership is a requisite to HLP’s success.

Homeownership Loan Program

Income Range	Total Housing Costs (1)	Less: Grant Funds Applied	Borrower Down Payment (1)	Amount to Finance	Loan to Cost %	Leverage % (2)	Housing Burden %
\$34,000 - \$36,000	\$100,000	-\$50,000	-\$1,800	\$48,200	48%	100%	30%
\$37,000-\$38,000	\$100,000	-\$40,000	-\$1,800	\$58,200	58%	150%	30%
\$39,000-\$40,000	\$116,000	-\$50,000	-\$2,500	\$63,500	55%	132%	30%
\$41,000-\$44,000	\$116,000	-\$40,000	-\$2,500	\$73,500	63%	190%	28%
\$45,000-\$46,000	\$116,000	-\$30,000	-\$2,500	\$83,500	72%	287%	30%
\$47,000-\$49,000	\$116,000	-\$25,000	-\$2,500	\$88,500	76%	364%	29%
\$50,000-\$55,000	\$116,000	-\$25,000	-\$2,500	\$88,500	76%	364%	27%

(1) Includes, 15% Contractor Fee, 1.5% Closing Costs, and any costs to remove the current unit.

(2) (Amount to Finance + Borrower Downpayment)/Grant Funds Applied

HLP: Address the Need set forth in the Project Area

There are approximately 7,030 manufactured housing units in the Project Area, comprising 25% of the housing stock. Of these homes, 78% are over 25 years old and 43% are over 35 years old, and only 3% are under five years old.¹¹ In the Project Area, the excessive cost burdens are severe and the condition of many of the MHU’s owned by LMI households is terrible. The Greene County 2019-2020 Comprehensive Housing Affordability Strategy (CHAS)¹², which found 31% of households with a 30%-50% cost burden, 27% with greater than 50% cost burden, and 14% with greater than 80% cost burden. Only 28% of households in Greene County have

¹¹ 2024 County Tax Record data for Greene, Putnam & Hancock counties

¹² https://www.huduser.gov/portal/datasets/cp.html#data_2006-2020

less than 30% cost burden for their housing. Further, nearly one in four (23%) households in Greene County have one or more of the following severe housing problems: lack of a complete kitchen, lack of complete plumbing, more than one person per bedroom, a cost burden of more than 30%.

- The HLP retains affordable housing opportunities for LMI Households due to the ongoing funding source of loan repayments from prior second mortgage loans originated in the program.
- The HLP program ensures long term affordability for the LMI households because the loans are made with terms ranging from 15 to 30 years.
- The program supports stable home ownership with the support of PRICE Grant funds and funds provided by the FDIC Insured local community bank who has committed to participate in this program.
- The program supports underserved communities by not only offering this product for new construction, but also existing underserved communities by replacing existing MHU's that are no longer suitable for habitation. This will remove blighted properties from the underserved community areas in LMI households.

The HLP is remarkable because it provides an opportunity for LMI households to obtain traditional bank financing at favorable rates. These households would otherwise not qualify for a mortgage loan and do not have an opportunity for homeownership, to maintain their homeownership by replacing their dilapidated home, or to purchase the site beneath their home. The PRICE grant is extraordinary in that it provides a vehicle to create an innovative HLP program that can provide intergenerational, transformative benefits to neighbors in need.

HLP Timeline:

- Preliminary Planning and Research– *Completed in advance of submission of PRICE grant application.*
 - Real estate market analysis to assess the supply of potential lots for new construction and existing homes for replacement.
 - Gather development and construction costs from local realtors, developers and builders.
 - Discussions with homeowners, builders, and realtors to assess the need and support for this program.
 - Financial analysis of benefits and associated costs to prospective LMI borrowers.
 - Research of manufactured homes and manufacturing facilities to assess costs and available supply.
 - Evaluate personnel resources required to administer the program.
 - Research relevant federal, state, and local regulations.
 - Ensure compliance with fair lending laws, consumer protection regulations, and other legal requirements.
 - Establish criteria for who can apply for loans (e.g., income levels, credit history), define loan amounts, interest rates, and any fees

- Introduction of the HLP to potential bank partners in the Project Area to confirm interest and ability to develop the innovative HLP and initial design of the loan product.
- Receive letter of intent from bank partners to participate in the HLP.
- Hire HLP Program Manager (Month 1- Month 3)
 - Hire a staff person to manage HLP with a deference to candidates with expertise in lending, financial analysis, and nonprofit management.
- Program Development (Month 4 – Month 9)
 - Establish personnel recruitment and training strategy.
 - Establish underwriting guidelines, policies and operating procedures to implement the program in compliance with all federal guidelines, including HUD guidelines and Davis-Bacon Act requirements.
 - Develop policies for record retention, access control, and data security.
 - Create documentation templates.
 - Develop a portal for application submissions and tracking.
 - Identify physical resources/location for staff.
 - Establish memorandums of understanding with bank partners.
 - Conduct training sessions on program policies, loan processing, and customer interaction. Test technology and operational systems.
- Marketing – (Month 10-Month 13)
 - Develop marketing plan to include participation and input from local stakeholders, local media, and social media strategies.
 - Highlight affirmative marketing plan and Fair Housing advancement strategies and improve upon as needed for maximum impact.
 - Create promotional materials (e.g., brochures, flyers, social media campaign).
- Pilot testing (Month 14- Month 16)
 - Pilot the program with a limited number of participants to gather data for any potential modifications to the program.
 - Review data from the pilot test and modify program as needed.
- Implementation (Month 17)
 - Officially launch the program with a public announcement and marketing campaign.
 - Begin accepting and processing loan applications.
 - Disburse funds at closing
 - Monitor loan repayments and provide support to borrowers as needed.
 - Monitor application processing times and approval rates.
 - Establish mechanisms for receiving feedback from loan recipients.
- Implement quality control measures to ensure compliance and accuracy.
- Prepare reports on program outcomes and financial performance.
- Evaluate the program, analyze trends, and continue to improve the operations.
- Review compliance with regulations and make necessary adjustments.
- Communicate with stakeholders to address issues and gather feedback.

EXHIBIT E- CAPACITY

SVdP is Experienced Managing Projects:

SVdP Georgia has extensive experience managing projects. SVdP's food access programs are statewide and include 40 community food pantries, a food recovery and distribution program, a teaching kitchen, nutrition programs, a monthly food boxes program for Veterans, and dedicated SNAP benefits program navigators. In 2023, SVdP distributed 1.9M lbs of food.

The SVdP GA Community Pharmacy is a statewide resource, creating access to life-sustaining prescription drugs for those who are unable to afford their medications. It is a fully licensed charitable pharmacy staffed by a full-time, licensed pharmacist and pharmacy technicians that provides free prescription medication to those in need with a valid prescription. The pharmacy focuses on maintenance medications to treat chronic conditions such as diabetes, COPD, asthma, high blood pressure, high cholesterol, arthritis, mental health conditions and more. In 2023, the pharmacy filled 17,049 prescriptions valued at over \$2,741,794.

The SVdP mission of helping neighbors in need was fulfilled in 2023 with assistance to 191,638 neighbors with 28,477 meetings with neighbors and 550,000 volunteer hours. Statewide program and services provided in 2023 were approximately \$24,800,000. Nearly 95% of revenue supports programs and services statewide; in 2023, \$24.8M supported programs and services with revenue of \$26.2M.

SVdP's housing programs include eviction prevention, emergency financial assistance, transitional housing, the Motel to Home program, the HANDS program, the LEAP program, and a permanently affordable housing development ("The Vincent").

SVdP originated and manages the largest Motel to Home Program ("MTH") in Georgia. MTH helps households pay the necessary upfront costs of moving from an extended stay motel and pairs them with a dedicated caseworker who provides assistance and resources to promote economic mobility and a path to self-sufficiency. MTH uses targeted interventions along with a trauma informed care approach to help neighbors create individualized plans to achieve stability, including workforce development, financial literacy, a peer mentor and a circle of peer support, and provision of furniture and household necessities. SVdP's Housing and Savings ("HANDS") program for neighbors who have received housing assistance recognizes the importance of saving up a "nest egg" to avert insecurity and homelessness when unexpected expenses and hardship arise. HANDS participants also prioritize long-term sustainability goals, such as education, homeownership, or entrepreneurship. HANDS provides monthly virtual meetings with budgeting information, community experts, and camaraderie from cohort members. SVdP provides a matching savings contribution as an incentive for participants to save and to accelerate their progress toward their savings goals. The Landlord Engagement & Advocacy Program ("LEAP") assists households with housing barriers, such as evictions and low credit scores, to locate safe, healthy rental housing in an increasingly limited rental market. The LEAP

Program connects neighbors in need of housing with a professional housing navigator who refers them to suitable housing options obtained via engaging with mission-aligned landlords.

SVdP is currently developing a mixed-use, affordable housing development, The Vincent, in the Lakewood Heights community in the City of Atlanta, where it has had a steadfast presence since 2014. The Vincent will provide long-term affordability and sustainability and serve as a catalyst for equitable revitalization and growth in the heart of the Lakewood Heights community. It will provide 67 rental units consisting of 1-bedroom, 2-bedroom, and 3-bedroom apartments, an additional 7,500 sq. ft. of retail space, and structured parking. This approximately \$30 million investment will help create quality new housing and boost desirable commercial activity, improving public safety and public infrastructure. SVdP has selected Mercy Housing Southeast as the developer partner, one of the largest developers, owners, and operators of high-quality affordable housing, in the country. SVdP recently completed the entitlement phase for The Vincent, which included rezoning two parcels and land use designation. This phase involved extensive community engagement, including three design workshop charettes. Low Income Housing Tax Credits are sought for financing the development, and units are anticipated to be rented at a mix of 50%-80% of Area Median Income (AMI), with an average AMI of 59% and weighted average based on the number of units in each income category of 75%. Construction is anticipated in the first half of 2025. **SVdP's key staff:**

Mike Mies, Executive Director, joined St. Vincent de Paul as Executive Director after more than 20 years' volunteer experience with the organization. Mike most recently served St. Vincent de Paul as Council President and Board Chair and has held leadership roles at the local and regional level in addition to being a volunteer caseworker. Mike has functional expertise in general management, finance, marketing, strategy development, M&A, start-ups and business integration. Prior to taking his current role, Mike was the Chief Executive Officer of Creston Water Solutions (formerly NClear, Inc.), an early-stage environmental technology company, where he continues to serve on the Board of Directors. Mike's prior experience includes: President of a management consulting practice he founded to provide management and advisory services to private companies experiencing managerial, strategic, operational or growth-related challenges; Founder and CEO of a wireless broadband service provider; CFO of public telecom companies in the US and in Germany; and Director of European Operations for a Fortune 500 company, with P&L responsibility for a \$165 million pan-European distribution business. A native of the Detroit area, Mike earned his BA-Economics (magna cum laude) from the University of Michigan, and MBA (magna cum laude) from Wayne State University.

Darrell Hooker, Sr. Director of Operations, joined St. Vincent de Paul Georgia in January 2020, overseeing the day-to-day functioning of our 9 Thrift stores in North Georgia, the Chamblee Campus, our food recovery operations, and recycling initiatives. Darrell brings with him more than 25 years of experience in the hospitality industry as a chef and general manager. Before joining the SVdP team, he ran his own consulting firm training restaurant owners, managers, and staff for greater operational efficiency and enhanced customer service. He is a veteran of the United States Marine Corps, where he served, among other places, in Operation Desert Storm.

Susan Hansen, Chief Financial Officer is also the Founder/ Director of the Mustard Tree Foundation, which helps young people in Georgia, North Carolina, and Florida receive scholarships for rehabilitation counseling for addiction from enthusiastic sobriety programs. In other past positions, Sue was the CFO for Marist School for 9 years and taught their accounting and finance program, an Adjunct Professor of Accounting and Finance at Oglethorpe University, and a Head of School for 4 years at Atlanta International Montessori School, and Vice President for 6 years at Brebeuf Jesuit High School. She was also the Founder/Director of Camp Awareness, a camp for children with autism for 12 years.

Bea Perdue, Sr. Director of Philanthropy, most recently served as Senior Director of Development for Worldreader, a global digital reading non-profit, tasked with building and launching a US fundraising operation. Additionally, she has held leadership roles in Atlanta, serving Atlanta Habitat for Humanity and MedShare. She began an advancement career in higher education as part of a revitalization team assembled by Dr. Johnnetta B. Cole at Bennett College. The success of these efforts led to her role as the inaugural Development Director for the newly established College of Behavioral Sciences at Middle Tennessee State University. As a certified DE&I Consultant, Bea shares her knowledge and expertise within and beyond fundraising to build broad bases of support for missions and to address our community's most pressing needs.

Mariel Risner Sivley, Esq., Director of Housing, engages new opportunities for strategic partnerships and oversees housing programs. Mariel is a Board member of the Georgia Supportive Housing Association (GSHA), and previously served as Executive Director of the organization. She is an Advisory Board member of HouseATL, a cross-sector group of civic leaders committed to building the political and community will for a comprehensive and coordinated housing affordability action plan in the City of Atlanta. Mariel started her career as an attorney with the Georgia Law Center for the Homeless. She served as an Adjunct Professor at Emory University School of Law and as the volunteer coordinator for the Atlanta Long Term Care Ombudsman Program. She is a graduate of Emory University and the Georgia State University College of Law.

Mike Sleeth, SVdP COKAS Caseworker, has lived in Putnam County Georgia for 18 years. His banking and mortgage experience spans 50 years during which time he has held senior management positions in finance, information technology, retail branch management and loan & deposit operations at five banks and two mortgage companies. He has been an organizer in two de novo banks and one mortgage company. He recently retired from an eleven-year career at BankSouth, BankSouth Mortgage, and Coldwell Banker Real Estate, in Greensboro, Ga. where he served as the Chief Financial Officer. Mr. Sleeth held an active CPA certificate for 46 years until his retirement in 2022. He was an active member in the Rotary Club of Alpharetta, Georgia for 20 years, where he served as president for one year. He currently is a member of St. Vincent de Paul at Christ our King and Savior Catholic Church, a member of Neighbors Helping Neighbors, and a member of the Greene County Family Connection where he also serves as the Chairperson of the Housing and Homeless Strategy Team. All three of these organizations are located in Greensboro, Georgia.

SVdP's Grant Experience:

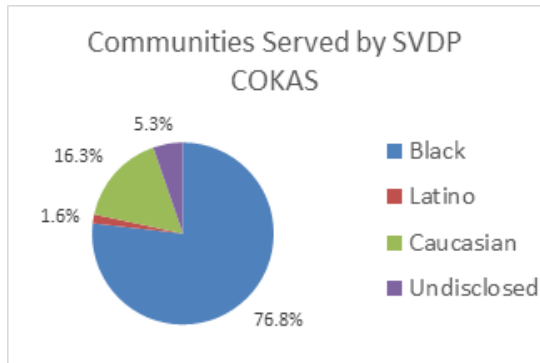
SVdP manages \$2M in federal, state, and local grants annually as well as philanthropic grants. In 2022, SVdP was awarded a grant from QuikTrip in the amount of \$1,075,000 for the Motel To Home program. SVdP has a proven track record of successfully managing grants and maintaining strict compliance with all regulatory requirements. Over the years, we have developed robust systems and procedures to ensure meticulous adherence to grant guidelines and reporting standards. The development team possesses extensive experience in grant administration, from application to final reporting, ensuring that all funds are used effectively and transparently. SVdP prioritizes accountability and undergoes an annual audit by an Independent Auditor, which is posted annually on SVdP's website with SVdP's [Financial Reports](#). This unwavering commitment to compliance and effective grant management has allowed us to consistently deliver impactful programs and foster strong, trusting relationships with our funders.

SVdP's Experience Promoting Racial Equity:

SVdP has extensive experience and resources for effectively addressing the needs of underserved communities. SVdP has a longstanding commitment to promoting racial equity, deeply rooted in its mission to serve all individuals with dignity and respect. Through various programs and initiatives, the organization actively addresses systemic inequalities and fosters inclusive communities. By providing resources, advocacy, and support to marginalized groups, SVdP works to dismantle barriers and create opportunities for all. In 2023, financial assistance from local statewide chapters reflects this dedication serving neighbors: 52.89% Black, 24.76% Caucasian, 11.95% Latino/Hispanic, 7.07% Undisclosed, .62% Mixed/Other, .03% Asian.

In the Project Area, SVdP COKAS volunteer caseworkers staff an assistance telephone line for members of our underserved communities to request food, rent, utility, or other assistance. The caseworkers then conduct "home visits" to provide aid and comfort to their neighbors in need and to better understand their circumstances and struggles. Last year, COKAS provided over \$300,000 in assistance. In the COKAS service area which overlays the Project Area, 41% of the

population are Black and Hispanic but comprise 78.4% of the neighbors served by COKAS.



SVdP's experience completing environmental reviews: SVdP is committed to ensuring compliance with all environmental review requirements for our projects and will partner with Atlantica Properties, which has extensive experience in conducting environmental reviews in accordance with 24 CFR part 50 and 24 CFR part 58. This partnership ensures that our project will be implemented with the highest standards of environmental responsibility and regulatory compliance.

Atlantica Properties Dunn's Expertise: Darion Dunn, the managing partner of Atlantica Properties, is a licensed professional engineer in the State of Georgia with over 20 years of experience. His expertise includes overseeing projects that require rigorous environmental reviews, ensuring they meet all regulatory requirements. His background in engineering and project management, particularly with the Department of Transportation (DOT) projects, involves detailed environmental assessments and mitigation planning. Atlantica's experience includes:

- Compliance with 24 CFR Part 50 and 24 CFR Part 58. This includes initiating environmental reviews early in the project planning process to identify potential environmental impacts and necessary mitigation measures, working closely with HUD officials to ensure that all environmental review documentation is accurate, comprehensive, and submitted in a timely manner, and partnering with local governments to conduct thorough environmental reviews and ensure procedural requirements are met.
- Ensuring environmental review records are meticulously documented and that compliance with NEPA (National Environmental Policy Act) and other environmental laws is maintained throughout the project lifecycle.

Examples of Previous Environmental Reviews:

- Project-Based Voucher (PBV) applications under HUD. These reviews require meticulous adherence to environmental regulations to ensure that housing developments do not adversely impact the environment and comply with federal, state, and local environmental standards. Ensuring that housing projects enhance community health and

safety by addressing potential environmental hazards such as soil contamination and poor air quality.

- Department of Transportation Projects which inherently involve complex environmental reviews. These projects required:
 - Environmental Impact Statements (EIS): Preparation of comprehensive EIS documents that evaluate the potential environmental effects of proposed transportation projects.
 - Mitigation Plans: Development and implementation of mitigation plans to address identified environmental impacts, ensuring sustainable project development.

By leveraging the extensive experience of Atlantica Properties, the Project is well-equipped to conduct thorough and compliant environmental reviews. This ensures that our development activities are environmentally responsible and align with the goals of sustainable and resilient community development.

SVdP's experience with cross-cutting federal requirements: SVdP and its development partner, Atlantica Properties, are well-versed in complying with various cross-cutting federal requirements. Our extensive experience ensures that we adhere to all relevant regulations and standards, promoting transparency, fairness, and accountability in all our projects.

Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards: We understand the importance of complying with 2 CFR part 200, which provides a framework for managing federal funds. Our approach includes:

- We maintain robust financial management systems to ensure proper tracking, allocation, and reporting of federal funds. This includes detailed record-keeping, internal controls, and regular financial audits to ensure compliance with federal requirements.
- Our project management team adheres to the cost principles outlined in 2 CFR part 200, ensuring that all expenditures are necessary, reasonable, and allocable to the project. We conduct regular reviews to ensure that costs are justified and properly documented.
- We are committed to meeting the audit requirements set forth in 2 CFR part 200. Our financial statements are audited annually by an independent auditor, and we promptly address any findings or recommendations to improve our financial management practices.
- Following Fair Housing and Nondiscrimination Requirements.

Promoting Equal Opportunity, Fair Housing, and Nondiscrimination Requirements: SVdP and Atlantica Properties are committed to promoting fair housing and nondiscrimination in all our projects. We comply with all relevant federal, state, and local fair housing laws, including the Fair Housing Act, which prohibits discrimination based on race, color, national origin, religion, sex, familial status, and disability. Our efforts include:

- Implementing inclusive marketing strategies to ensure that information about housing opportunities reaches diverse populations, including those in protected classes.

- Providing reasonable accommodation and modifications for individuals with disabilities to ensure equal access to housing.
- Conducting regular training sessions for staff and contractors on fair housing laws and best practices to prevent discrimination.
- Compliance with 2 CFR part 200, Davis-Bacon labor standards, fair housing and nondiscrimination laws, and the Uniform Relocation Act.
- Contracting Opportunities: SVdP and its partners are committed to contracting with businesses owned by low-income individuals, minority-owned businesses, and women-owned businesses. Our procurement process will:
 - ∓ Encourage Local Contracting: We will prioritize contracting with local businesses, particularly those owned by low-income individuals. This will ensure that the economic benefits of the project stay within the community and support local economic growth.
 - ∓ Promote Small Business Participation: We will actively seek to engage small businesses, providing them with the opportunity to participate in the project. This includes outreach and support to help small businesses navigate the contracting process.
 - ∓ Section 3 of the Housing and Urban Development Act of 1968 compliance, monitoring, and reporting.

EXHIBIT F- MATCH OR LEVERAGE

SVdP has leverage funding for the Homeownership Loan Program from a local bank, which has expressed its intent to provide construction and permanent financing to eligible borrowers for owner occupied housing. Please see attached letter. Loan eligibility is subject to the bank's credit standards with terms and pricing to be determined. Collateral is to be a 1st lien position on the borrower's residence in the Project Area. For the applicant's \$3,000,000 HLP award request, the leveraged bank funding is \$5,250,000, which is more than 50% of the HLP grant funds requested and 42% of the total Project grant funds requested (MHC and HLP).

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EXHIBIT G- LONG-TERM EFFECT

Chief needs identified in Exhibit C are social distress and a preponderance of unhealthy and aging housing for ELI and LMI households. The dual components of SVdP's Project directly target these needs.

Ensuring Long-Term Housing Stability:

The MHC accomplishes long-term affordability through comprehensive planning from the outset, informed by SVdP's long-standing engagement in supportive services in the Project Area. The MHC's pro forma is in alignment with SVdP's non-profit mission which details the financial sustainability plan to ensure long-term affordability. Because the MHC's affordability is capitalized at the outset and its new MHUs are designed for long-term sustainability, it will not require future federal subsidy. SVdP may seek to acquire project-based housing vouchers from the housing authority for units and will accept tenant-based housing vouchers, but those activities are not necessary to maintain long-term affordability.

The HLP program will help renters become homeowners in an innovative leverage of PRICE funds to access traditional, fixed-rate bank loans that would otherwise be inaccessible to LMI borrowers. The HLP debt to income (or total housing burden including loan payment, taxes and insurance) will not exceed 30% of borrower's income and remains affordable for the term of the loan. Modern manufactured homes are built to last with weather-appropriate materials, energy-efficient features, compliance with stringent building codes, effective moisture and pest control measures, and secure foundation and anchoring systems. These features provide long-term benefits of mitigation activities and weatherization.

The HLP offers numerous long-term benefits to underserved LMI households. Homeownership provides stability and wealth-building opportunities through equity accumulation and property value appreciation. Tax benefits, such as mortgage interest and property tax deductions, along with capital gains exclusions, further enhance financial advantages. Homeownership also ensures stable housing costs, especially with an HLP fixed-rate mortgage, to protect against rent increases and serving as an inflation hedge. Importantly, homeownership provides control and a sense of permanence, fostering stability. The HLP is designed for underserved communities to obtain these benefits and will be affirmatively marketed.

The HLP also enables LMI households to move out of their old, dilapidated mobile home and purchase a new one. Both the MHC and HLP enable underserved, protected neighbors to live in healthy, stable housing. This reaps intergenerational wellness and immediately inures benefit to the children in the home. Healthy, stable homes provide a conducive learning environment and enable consistent school attendance. Healthy housing averts dangerous exposure to hazards like mold and lead, cockroaches and rats. Mental health benefits all generations of the household

from reduced stress and anxiety from unhealthy physical environments and high levels of social distress. A secure home enables children's social and emotional stability- they can play, form lasting friendships, and feel community pride and a sense of place. In these ways, the long-term effect of the Project includes mental, physical, and social resilience.

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ADVANCING RACIAL EQUITY – Attachment A

Research conducted by SVdP to advance racial equity finds that race and ethnicity disparately impact housing stability in Georgia.² Black and Hispanic households have lower median incomes than White and Asian households and Georgians who identify as Black or African American are more likely to experience homelessness. In 2021, Black or African American individuals represented 30.8% of the statewide population and 77.6% of people experiencing homelessness. The proportion of Georgians over the age of 55 experiencing homelessness increased from 20% in 2018 to 23% in 2021 with a larger share of those individuals being over age 65.

Among the most marginalized renters, according to 2021 U.S. Census data, the share of Black, Indigenous, and Asian households suffering from moderately inadequate housing conditions across the U.S. is 7%, 10%, and 4%, respectively, while 6% of white households suffer from moderately inadequate housing conditions.¹ Moderately inadequate is described as “lack of upkeep of a rental unit and its exterior premises.” In Georgia, 21% of Black families are identified as living in substandard housing conditions.² Substandard housing conditions, which can include lacking kitchen or plumbing facilities, pose significant risks to well-being. People who are housing insecure have medical expenditures over the twice the average.³

In Georgia, significant racial inequities exist in homeownership rates and related economic indicators. As of 2020, the homeownership rate for White households was around 75%, compared to 47% for Black households and 50% for Hispanic households.⁴ Income disparities contribute to this gap, with the median household income for White households being approximately \$71,000, while it is around \$44,000 for Black households and \$49,000 for Hispanic households.⁵ Wealth disparities also play a critical role, as White families have a median net worth of about ten times that of Black families.⁶ Black and Hispanic applicants face higher mortgage denial rates, with 19% of Black applicants and 11% of Hispanic applicants being denied, compared to 8% of White applicants in 2019.⁷ Historical redlining practices have long-term effects, leading to lower property values and limited access to credit in affected areas, disproportionately impacting Black and Hispanic communities.⁸ Additionally, Black and Hispanic homeowners in Georgia are more likely to face foreclosure during economic downturns, a trend that was evident during the 2008 financial crisis and continues today.⁹ These statistics underscore the need for targeted interventions to promote racial equity in housing.

To reduce these barriers, SVdP will affirmatively market its Project in the highest need census tracts. SVdP will engage diverse stakeholders in the planning process through community surveys and multilingual meetings to ensure all voices are heard. SVdP will provide both affordable rental homes and accessibility to homeownership for diverse household structures. Also, the MHC will specifically support residents with educational opportunities, healthcare access, and workforce development programs.

SVdP will implement and enforce strict anti-discrimination policies and provide bias training for staff. SVdP will focus on environmental justice and sustainable building practices to ensure a healthy living environment. SVdP will regularly evaluate the community's impact on racial

equity and disability status and adapt policies based on feedback and to respond to barriers. SVdP will continue to partner with local organizations to advocate for broader policy changes to promote racial equity. SVdP will ensure compliance with fair housing laws and maintain transparency in all housing-related dealings to create an inclusive, equitable, and supportive mobile home community for all residents.

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AFFIRMATIVE MARKETING- Attachment B

SVdP's affirmative marketing plan will actively promote housing opportunities to a diverse range of households, particularly those who might be underserved or disadvantaged in the housing market. This plan aims to ensure equal access to housing opportunities and to prevent discrimination based on race, color, national origin, religion, sex, disability, familial status, or other protected characteristics. By leveraging a mix of digital, print, and community-focused strategies, the affirmative marketing plan seeks to reach diverse demographics.

The affirmative marketing plan will prioritize robust community engagement through both social media and in-person initiatives, including in Spanish. Leveraging social media platforms, we will create and share engaging content that highlights the benefits of our Project. These platforms will serve as vital tools for reaching a broad audience and provide visibility and engagement.

In-person community engagement will be a cornerstone of our marketing strategy. We will utilize community partners and community events that reach diverse demographics and particularly protected classes, such as Martha's Closet, to provide information and to market both prongs of the Project.

Staff will be trained to market the MHC and HLP to a wide array of demographics, including focusing on Black and Hispanic communities, seniors, and households with disabilities. To ensure inclusivity and accessibility, we will make reasonable accommodations for individuals with disabilities and provide all marketing materials and resources in both English and Spanish. This commitment includes having bilingual staff available during events and on social media platforms, as well as offering translation services for all loan program documentation and community information.

AFFIRMATIVELY FURTHERING FAIR HOUSING- Attachment C

SVdP is committed to affirmatively furthering fair housing by actively promoting inclusivity and equal access to housing opportunities for all individuals, regardless of race, color, national origin, sex, disability, religion, familial status, or other protected characteristics. SVdP will implement targeted marketing strategies to reach diverse populations, including those who have historically been underserved or disadvantaged in the housing market. By using data-driven approaches to identify and address gaps in housing access, we aim to ensure that our MHC and HLP reflect the diversity of the broader population and are actively marketed to underserved populations.

To achieve this, we will partner with local community organizations, housing advocacy groups, and social service agencies to reach households from various backgrounds. These partnerships will help us disseminate information about our Project to a wider audience, particularly in minority and low-income communities. Furthermore, we will ensure that our marketing materials, events, and services are accessible to all, including offering bilingual resources and translation services to accommodate non-English speakers. Our commitment to reasonable accommodations for individuals with disabilities will include accessible home designs and supportive, voluntary caseworker services to meet their needs. By fostering an environment of inclusivity and actively addressing barriers to fair housing, our program will not only comply with fair housing laws but also promote HUD's fair housing objectives.