

## **Exhibit D – SOUNDNESS OF APPROACH**

### **SUBFACTOR (b)(i): PROJECT DESCRIPTION, MANAGEMENT, AND IMPACT**

**SVdP’s Vision:** We provide a two-pronged approach to advance affordability and equity for LMI households by creating a safe, healthy, affordable multifamily rental MHC and an innovative LMI homeownership loan product that pairs with traditional bank financing. Together, the two proposed programs will provide long-term affordable housing for 165 households, at an efficient cost of \$97,967 per household. The vision is informed by a diverse stakeholder group that includes residents of MHC and underserved households in need of housing.

**SVdP’s Project Goals:** Foster transformative, intergenerational benefit to the households served. Increase housing supply and affordability for LMI persons in a rural area. Prioritize equity and affirmatively further fair housing. Ensure long-term housing availability, accessibility, and affordability for LMI households. Provide an opportunity for first-time homeownership and continued homeownership, if the MHU is aged and unrepairable. Reduce blight. Provide resilient and high-quality MHU that mitigate environmental threats, including socioeconomic threats. Create programming, such as the homeownership loan program, replicable in every community.

**“A Place to Call Home” achieves National Objectives:**<sup>1</sup> SVdP’s project provides stable housing to 100% LMI persons and households. It also addresses slums and blighted properties in a designated area or on a spot basis.

#### **Activity 1: Development of an MHC:**

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 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. With the injection of PRICE award funds, SVdP will be able to increase housing supply and affordability for LMI households, reduce blight, increase weather resilience, engage a broad stakeholder group, enfranchise MHC residents, and improve infrastructure in a high-need area. Of note, the MHC will have a clubhouse for residents to host community events and where SVdP, Greene County Family Connection (GCFC), and other nonprofit partners provide services and activities 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 an attractive playground in addition to the community clubhouse. SVdP recognizes that the real asset of a community lies in its ability to socialize through programs and spaces designed to enhance every resident’s quality of life.

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<sup>1</sup> [CDBG Guide to National Objective and Eligible Activities for Entitlement Communities \(hudexchange.info\)](https://hudexchange.info)

### **Activity 1 – MHC Eligible Activities that Address the Needs of the Project Area:**

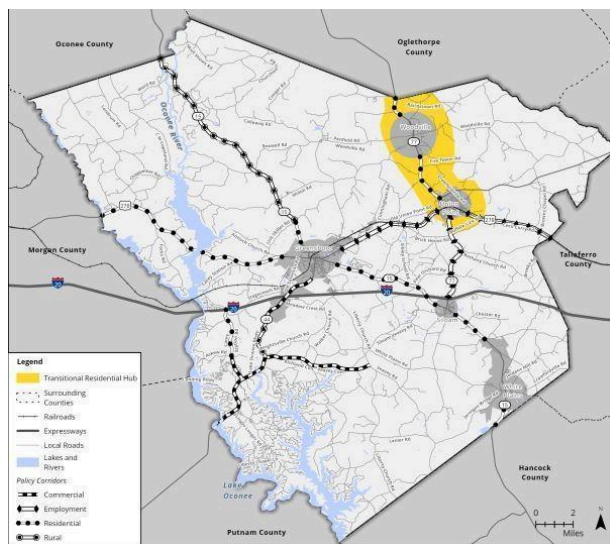
- Manufactured housing development activities (III.F.2.c.iii and III.F.2(d))
- Financing the acquisition or installation of affordable, accessible housing (III.F.2.c.iii(a))
- Acquiring land or real property for the development of affordable housing (III.F.2.c.iii(b))
- Acquisition of affordable manufactured 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 1 –MHC - Describe the activities you will undertake, how they will address existing need(s), and why they are an ideal solution to address the need(s). Describe how your proposal ensures housing stability for displaced residents and how their long-term housing stability will be ensured. Finally, describe whether units will be reserved for households assisted under other HUD affordable housing programs serving the needs of low-income households such as eligible Housing Choice Voucher (HCV) recipients, or the Indian Housing Block Grant (IHBG).**

A mission-driven MHC with a minimum of 90 units with long-term affordability is critically needed in the Project Area and desirable for the rural area. SVdP's MHC will provide a low barrier, safe and healthy community with top-of-the-line MHU and on-site services. This will prove transformative to the households served. Residents will not be displaced upon acquisition and development of the MHC. Residents of the MHC will be protected by lease protections

greater than those required by Fannie Mae or Freddie Mac, Fair Housing law, and state law. SVdP utilizes a model lease which upholds the recommendations of the White House Blueprint for a Renters Bill of Rights and HUD's 30-Day Notification Requirement Prior to Termination of Lease for Nonpayment of Rent Rule which also readily enables repayment agreements. Tenant-based Rental Assistance vouchers will be utilized at the MHC. The Indian Housing Block Grant is not generally used in Georgia. SVdP will seek Project Based Rental Assistance (PBRA) housing vouchers from the Housing Authority in the Project Area to buttress the MHC's sustainability, but in the event PBRA are not immediately available, the MHC is designed for permanent affordability for LMI households utilizing capital infusion from the PRICE award. This ensures LMI households will pay no more than 30 percent of gross income.

**Activity 1 – MHC Physical descriptions, geography, maps:** SVdP will acquire up to 25 acres of land or real property for the development of an MHC with 90 manufactured housing units (MHUs), focusing on “Opportunity Zones” and Transitional Residential Hubs located in the Project Area described in the Green County Comprehensive Plan. SVdP will secure land in strategic locations in proximity to employment, amenities, and utilities, improving infrastructure and access to opportunity for LMI households.



2023 Greene County Future Land Use Map<sup>9</sup>

Contingent upon PRICE award funding, SVdP is in discussions with owners of 24 acres in the City of Greensboro, Greene County. One of the tracts has sewer and water and utilities infrastructure and is zoned for multifamily residential. This land is very close to a grocery store, other amenities, and employment opportunities. It is an area with desirable socioeconomic diversity near downtown Greensboro and the property abuts an area of attractive residential homes. One of the parcels has blighted MHUs and acquisition of the MHC by SVdP, a mission-driven nonprofit owner, provides the benefit of preserving long-term housing affordability for current residents, removing blight and revitalizing the MHC to provide safe and permanently affordable housing for the current residents and new residents.

### **Activity 1 – MHC Timeline:**

Site Selection (Month 1 - Month 3) The initial phase of the project involves a site to achieve the project's goals. Key tasks 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) Key tasks 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.

Land Entitlement and Public Engagement (Month 7 - Month 10) The land entitlement phase involves applying for land use and rezoning changes or variance(s), if such are needed. *Note:* The site under consideration in Greensboro, Greene County, does not need these changes. Key tasks include:

- Organizing and conducting public engagement sessions to inform and involve community members in the planning process.
- Undergoing land entitlement processes.

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 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 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 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.

**Activity 1 - MHC Budget:** The development budget for 90 MHUs on 25 acres is \$12,141,000, which includes \$500,000 for a leasing office/clubhouse, playground, community pavilion and an entrance edifice. 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.

The average sales cost of new manufactured homes by region (South) in the United States, per the U.S. Census Bureau in 2023 was \$117,712 across available widths.<sup>2</sup> The *per unit* cost for SVdP's 90-unit community including land, site, and infrastructure is approximately \$129,344, not including a clubhouse, playground, entrance, and pavilion amenities.

### **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 further 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 (PBRA) and tenant based rental assistance (TBRA). Any subsidies, such as PBRA and TBRA, will serve to further benefit the community by funding additional programs and services as "Safe at Home" provides long-term affordability even in the absence of such subsidies.
- 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 LMI families maintain long-term housing stability.

<u>Estimated Land Calculation</u>	<u>Sq. Ft.</u>	<u>Acres</u>
# of MHU's	90	
# of sq ft per MHU	9,000	
Total sq ft Required for MHU's	810,000	18.6
Required for Common Area, and Structures @ 30 %	243,000	5.6
Total		24.2

**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.

<sup>2</sup> <https://www.census.gov/programs-surveys/mhs/data/latest-data.html>

**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 LMI households with an award of PRICE funds and leveraging community partnerships to provide wraparound services, the housing remains affordable for the target population for 30+ years.

**Developer Partner:** 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. 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 managed by its co-founders, Darion Dunn and Trenton Dunn. Darion and Trenton Dunn are brothers who were born and raised in Atlanta. Asset Management Services include: SFR Portfolio & Multifamily Acquisition, Land Entitlement & Development, Property Management, and Residential & Commercial Sales.

Recent project experience includes The Melody, Atlanta's first multifamily shipping container development, and a model for reducing the city's unhoused community. It was the inaugural project to be delivered as part of Mayor Andre Dickens' Rapid Housing Initiative, which has a goal to build 500 units of housing for homeless by 2025. Atlantica Properties was selected as the developer for the Rapid Housing Initiative after a competitive RFP process that solicited respondents from across the United States. The \$5M project converted 20 containers into 40 studio apartments on a parking lot south of downtown. It took four months from the idea to completion – the fastest turnaround for a multifamily project in Atlanta. Construction began in October 2023 and was completed by January 2024. Its quick completion was due to innovative design and construction techniques, a shared vision, and community involvement. Team members included the City of Atlanta, Partners for Home, and The Beck Group.

**Activity 1 - MHC Impact and Accessibility:** The MHC reduces blight, creates safe, healthy homes for LMI households, and creates access to long-term affordability amidst the housing crisis in the rural Project Area. Providing 90 MHUs with long-term affordability for 30+ years for 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. The MHC also provides a framework for residents' community-led decisions that reflect the collective interests and needs of the residents and increasing engagement. Accessibility is achieved via long-term affordability and by providing access for persons with disabilities. SVdP is very sensitive to the need to provide *more* than the minimum number of MHU with accommodations due to the critical need for homes for LMI individuals with disabilities and to age in place and the correlation between disability and rates of homelessness and housing instability. The MHC will be thoughtfully designed so that residents and their guests can enjoy each aspect of the community. It will comply with the Americans with Disabilities Act, Section 504 of the Rehabilitation Act of 1973, HUD's Section 504 regulations, implementing regulations, Fair Housing Act, other guidelines and regulations.

**Activity 1- MHC – How Long-Term Affordability is Achieved, Support to households with disabilities, access to services and transportation:** The MHC aligns with SVdP's non-profit

mission to provide affordability for 30+ years. Because the MHC's affordability is capitalized at the outset and new MHUs are designed for long-term durability and resilience, it will not require future federal subsidy. The affordability of the MHC is achieved using the infusion of PRICE grant award. SVdP will also seek to acquire project-based housing vouchers from the housing authority for units and will immediately accept tenant-based housing vouchers. However, because of the PRICE award capitalizing the development of the MHC and the durability of MHU, vouchers are not needed to provide long-term affordability.

SVdP utilizes the HUD definition of affordability: 30% of gross income on housing costs, including site rental, fees, and utilities. The project will use, at a minimum, affordability standards set forth by the HOME Investment Partnerships Program (HOME) requirements. 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 30 years. SVdP anticipates providing affordable rent to households in the MHC with Supplemental Security Income (SSI), Social Security Disability Income (SSDI), and fixed Social Security Administration (SSA) retirement income as the MHC will be positioned to serve households with disabilities and aging in place.

What is unique about SVdP's ownership of the MHC is the ability to serve the residents with staff and volunteers to access benefits and essential services. SVdP has on-staff Benefits Navigators to assist with Supplemental Nutrition Assistance Program (SNAP), Childcare and Parent Services (CAPS), Medicaid and Medicare, and health insurance through Georgia's Exchange. SVdP partners with healthcare providers to offer regular health check-ups, immunization clinics, and wellness programs on-site. And SVdP provides education classes for adults and children, including financial literacy, and SVdP's HANDS savings match program.

The MHC's clubhouse will be a community center where residents can access resources such as computers, internet, and meeting spaces for group activities and groups. The management company will also host events and activities to foster community engagement and social cohesion. SVdP will provide referrals to access counseling and mental health support through partnerships with local mental health organizations and has grant funding to subsidize in-person counseling. SVdP will also provide referrals to virtual mental health resources and telemedicine. If it is desired by the MHC residents, SVdP can operate a community shuttle service to key locations. SVdP can also provide residents with Lyft and Uber codes and discounted bus vouchers (there is no rapid transit in the Project Area.)

The MHC will have paved, well-lit, accessible walking paths within the community and connecting to nearby amenities. It is essential that SVdP and the contracted management company use a trauma-informed approach to maintain the MHC. Many residents of mobile home communities may have experienced various forms of trauma, including financial hardships, displacement, and personal or family crises. Of primary importance in selecting the management company is expertise and experience in trauma informed approach. A compassionate approach contributes to a positive community culture where residents feel valued and respected. Trauma-informed management can de-escalate potential conflicts more effectively and consider and address the underlying issues the resident may be facing. This can lead to increased resident satisfaction, lower turnover rates, and a more cohesive community.

**Activity 1 – MHC- SVdP Expertise and Stakeholder Relationships for Community and**

**Resident Impact:** A key strength lies in SVdP’s volunteer caseworker network at SVdP COKAS. Two volunteer caseworkers encourage and walk alongside each neighbor in need. Surrounded by these allies, neighbors have landed jobs, negotiated an eviction to remain housed, managed debt, received food and pharmacy benefits, received resources from SVdP’s thrift stores, and moved into self-sufficiency and stability. SVdP COKAS volunteer caseworkers’ expertise, strong stakeholder relationships, and commitment will provide excellence in the MHC. SVdP and SVdP COKAS is dedicated to making a positive impact and providing well-maintained, safe, affordable housing.

SVdP COKAS will leverage its strong relationships with major stakeholders involved in housing and social services initiatives and programs. We have established connections with community partners, such as Greene County Family Connection (“GCFCP”), 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.

SVdP is also deeply connected with Neighbors Helping Neighbors (“NHN”), a non-profit organization in Greene and Putnam Counties founded in 2020 to serve neighbors. NHN 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 focuses on one-time critical home repairs. NHN is a membership organization with approximately 400 members and dozens of volunteers who donate their time. NHN is presently 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). Relationships with these stakeholders, and many more in the Project Area, enable SVdP to foster collaboration, streamline communication, and leverage resources effectively. Additional partners include Martha’s Closet of Hancock County, Victory Train, Inc., Helping Hands Crisis Relief Center, Greene County Habitat for Humanity, Circle of Love Center, Inc., Goodwill, ViewPoint Health, and the Greene County Health Department.

**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 innovative 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. The second mortgage will automatically amortize just as the first mortgage amortizes. This provides an additional source of equity for the homeowner which promotes long-term affordability and increases the homeowner net worth

**Activity 2 - 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))

**Activity 2- HLP - Describe the activities you will undertake, how they will address existing need(s), and why they are an ideal solution to address the need(s). Describe how your proposal ensures housing stability for displaced residents and how their long-term housing stability will be ensured. Finally, describe whether units will be reserved for households assisted under other HUD affordable housing programs serving the needs of low-income households such as eligible Housing Choice Voucher (HCV) recipients, or the Indian Housing Block Grant (IHBG).**

The HLP program provides:

- Affordable financing options for a minimum of 75 LMI residents to purchase new homes or replace blighted homes.
- A no payment required, 0%, automatically amortizing second mortgage loan using grant funds enables borrowers to qualify to purchase new affordable homes.
- Quality new homes are energy efficient with Energy Star rating, durable, and weather resilient.
- Borrowers' housing burden is kept at or below 30% of household income.
- Grant funds are restored and reused by HLP if the borrower pays off the loan before maturity.
- The HLP program is administered directly by SVdP to ensure that residents receive the support they need to maintain their home ownership.
- HLP includes pre-paid closing costs and moving expenses to reduce up-front one-time expenses for borrowers.

The HLP is targeted to underserved households in the Project Area. It will be affirmatively marketed to those who are underserved and/or disadvantaged in the housing market, focusing on Black and Hispanic communities, seniors, and households with disabilities. This marketing plan and affirmatively furthering Fair Housing directly addresses the Project Area's severe disparities in poverty rates, vulnerability to housing instability, and access to homeownership wealth and equity. The HLP provides new construction homeownership and replaces substandard MHUs no longer suitable for habitation. This addresses an immediate need in the Project Area, serving underserved households in blighted properties to retain homeownership and live in healthy homes.

**Activity 2- HLP –Addresses the Need 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, 43% are over 25 years old, 51% are over 15 years old, and only 3% are under five years old.<sup>14</sup> 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)<sup>15</sup>, 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 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 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.

**Activity 2- HLP – Innovation:** The HLP is innovative for several reasons; it breaks down financial barriers for LMI households to achieve homeownership, it provides immediate home equity to the household, it makes the loan permanently affordable, and it promotes economic mobility. It can also be replicated as a model new solution to address housing affordability. An HLP would be desirable in most communities as increased homeownership rates can lead to community revitalization because homeowners' investments in their properties and communities lead to improved neighborhood conditions and increased property values. The HLP is also innovative for combining grant funds with traditional mortgage products, thereby leveraging public, private, and philanthropic resources, creating a robust and sustainable model for funding affordable housing.

The HLP is ideal because it braids private and public financing *and* leverages partnerships with local non-profit community organizations and government agencies to achieve the objective of affordable homeownership. 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 with responsible lenders, 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 also meet the long-term sustainability objectives. The HLP will not displace residents. If a homeowner has a substandard MHU, they

can utilize the HLP to obtain a new MHU and maintain homeownership. Similarly, if a rented or owned MHU cannot undergo repairs and accommodations needed to age in place or meet the needs of a household with disabilities, the HLP provides them with a homeownership opportunity.

### **Activity 2 - 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.

**Activity 2 - HLP Affordable Financing:** Eligible borrowers will be LMI with income less than 80% of the median income in Georgia. 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 no payment required, 0% mortgage loan upon each property, that will automatically amortize based upon the amortization of the first mortgage loan. SVdP will be able to recoup the remaining second mortgage loan balance 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 SVdP. 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 loan amount to each LMI applicant is leveraged with traditional bank financing, with the HLP providing \$25,000-\$50,000 per loan utilizing the PRICE grant funding to provide sufficient equity for the borrower to qualify for the first mortgage loan. The Bank will have a first mortgage position and service the second mortgage loans for SVdP.

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 which are currently in the 7% -7.5% range. The loan requires a borrower downpayment equal to 5% of the amount of the cost of the MHU to encourage borrower participation in the new home purchase.

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. (See chart below for detailed analysis.)

**HLP Leverage:** 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 will 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 funding source to ensure continued funds to provide long-term affordability for additional LMI households.

**HLP Match:** Legacy Housing Corporation, a large producer of manufactured homes in the United States, has a plant in Eatonton, Georgia, which is in the Project Area, and will provide wholesale pricing to SVdP at an estimated average unit wholesale price of \$50,000 for a MHU with an estimated unit price of \$65,000.

#### **HLP Program Summary**

Household Income	\$34,000 - \$36,000	\$37,000- \$38,000	\$39,000- \$40,000	\$41,000- \$44,000	\$45,000- \$46,000	\$47,000- \$49,000	\$50,000- \$55,000
MHU Size	2 BR, 1 BA	2 BR, 1 BA	3 BR, 2 BA	3 BR, 2 BA	3 BR, 2 BA	3 BR, 2 BA	3 BR, 2 BA
Purchase MHU (1)	\$36,000	\$36,000	\$50,000	\$50,000	\$50,000	\$50,000	\$50,000
Lot Cost	\$16,500	\$16,500	\$16,500	\$16,500	\$16,500	\$16,500	\$16,500
Installation/Development Costs (2)	\$44,900	\$44,900	\$46,900	\$46,900	\$46,900	\$46,900	\$46,900
Closing Costs and Interest	\$1,600	\$1,600	\$1,600	\$1,600	\$1,600	\$1,600	\$1,600
Moving & Misc	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000
Total Costs	\$100,000	\$100,000	\$116,000	\$116,000	\$116,000	\$116,000	\$116,000
Borrower Down Payment	\$1,800	\$1,800	\$2,500	\$2,500	\$2,500	\$2,500	\$2,500
Funds Provided by PRICE Grant	\$50,000	\$40,000	\$50,000	\$40,000	\$30,000	\$25,000	\$25,000
Amount Finance by Bank	\$48,200	\$58,200	\$63,500	\$73,500	\$83,500	\$88,500	\$88,500
Loan to Cost	48%	58%	55%	63%	72%	76%	76%
Leverage % (Grant Funds/Amt. Financed & Downpayment)	100%	150%	132%	190%	287%	364%	364%
Housing Burden	29% to 30%	29% to 30%	29% to 30%	28% to 30%	29% to 30%	28% to 29%	25% to 27%

- (1) Pricing obtained from National MHU Manufacturer
- (2) Includes builder/developer fee

**Activity 2- The HLP increases affordable and accessible housing opportunities for individuals with disabilities and supports integrated and independent living with access to supportive services such as health services and transportation.**

For households with fixed income, such as SSI, SSDI, and retirement benefits, homeownership can be out of reach. The HLP provides an opportunity for these households to qualify for permanently affordable homeownership at 30% of their income. The durable, efficient, and weather resilient MHU are the perfect housing option for households with limited income as they do not require expensive on-going maintenance and upkeep of a traditional site-built home. Importantly, the HLP enables the borrower to choose the location of their residence, so they can be within their networks of social connection, family, and services. It provides them with agency of choice and eliminates reliance upon a landlord to provide needed accommodations and quality of living. This is particularly important as individuals and households led by individuals with disabilities are more likely to face housing instability and housing in substandard condition, which also exacerbates health problems and increases the cost of living due to exploitative fees and high utility expenses.

**Economic opportunities to low-income individuals and 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 MHC'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. SVdP COKAS has relationships with employers, including Legacy Manufactured Homes in Eatonton in the Project Area.

Workforce development is the cornerstone for housing stability for employable households. SVdP will develop a workforce development program for residents in the MHC and the HLP and provide a training program, transportation, and supportive services. The certifications obtained will be resident-led and based upon local opportunities.

**SUBFACTOR (b)(ii): AFFORDABILITY AND EQUITY**

**Describe how the affordable homeownership and/or rental opportunities you plan to create will remain affordable for 30+ and be promoted to LMI households and protected classes:**

For the MHC and HLP, SVdP utilizes the HUD definition of affordability: 30% of gross income on housing costs, including site rental, fees, and utilities. SVdP will use as the minimum affordability standard the requirements of the HOME Investment Partnerships Program (HOME). This standard will be enforced through recorded use restrictions, covenants, deed restrictions, or other mechanisms, guaranteeing that the MHC and HLP housing remains affordable for at least 30 years.

The intention of mission-driven MHC is its permanent affordability. 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.

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 of the term of the loan. 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 HLP households will be at or below 80% of AMI and the loan will be 30% of income.

Affirmative marketing and outreach will be directed to protected classes. Even during the pre-application community engagement, SVdP has been particularly successful in reaching people who are underserved and disadvantaged in the housing market. People in need of housing have attended the community meeting and requested to sign a support letter. SVdP regularly serves at Martha's Closet and COKAS caseworkers meet daily with neighbors in need. SVdP's promotions also include digital and print, such as Facebook and notices and stories in the newspaper. This affirmative marketing plan reaches diverse demographics in the rural Project Area. The pre-application in-person community meeting saw more than 85 people in support of the application and asking to be voices in the community to market it further, even requesting to create and disseminate a support letter.

To fully deploy the MHC and HLP, SVdP's staff will be trained to market the MHC and HLP to underserved, protected individuals and households, and to focus on Black and Hispanic communities, seniors, and households with disabilities.

SVdP makes reasonable accommodations for individuals with disabilities and provides all marketing materials and resources in both English and Spanish. This commitment includes having bilingual staff available during events and on social media platforms. The MHC and HLP will provide translation services for all documentation and community information.

**Equitable Protections for Residents:** Residents of the MHC will be protected by lease protections greater than those required by Fannie Mae or Freddie Mac, Fair Housing law, and state law. SVdP utilizes a model lease which upholds the recommendations of the White House Blueprint for a Renters Bill of Rights and HUD's 30-Day Notification Requirement Prior to Termination of Lease for Nonpayment of Rent Rule which also readily enables repayment agreements. SVdP provides annual 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 (in

practice, it is a much longer notice time frame), a grace period for non-payment of rent, and the right to cure rent payment defaults. These protections provide stability and security for tenants.

The MHC will foster resident community 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.

Of primary importance in selecting the management company is expertise and experience in trauma informed approach. A compassionate approach contributes to a positive community culture where residents feel valued and respected. This can lead to increased resident satisfaction, lower turnover rates, addressing the underlying issues the resident may be facing, and a more cohesive community.

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

The MHC provides a minimum of 90 LMI households with 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 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.

**SVdP's 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 and HLP 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.

### **SUBFACTOR (b)(iii) 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.

SVdP has entered into a partnership with Disaster Services Corporation Society-St. Vincent de Paul USA (“DSC”), a § 501(c)(3) non-profit organization that operates as the disaster-relief arm of the SVdP USA and helps individuals facing situational poverty resulting from both natural and man-made disasters towards reclaiming their lives. DSC provides consulting services to SVdP to ensure MHCs are 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.

SVdP will engage DSC as its disaster preparedness advisor on its planned 90-home Manufactured Housing Community (“MHC”). DSC will serve as a consultant to (1) advise on the MHC design and infrastructure to maximize resiliency against severe weather events, such as severe wind, flooding, tornadoes, or hurricanes (2) assist in the design of a community center that may also serve as a severe weather shelter, and (3) provide disaster preparedness training to residents of the MHC and other local residents.

The MHC will be designed with a comprehensive approach to support 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 address these vulnerabilities through targeted interventions, community engagement, and resilience-building measures, as described in the next section.

**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:**

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 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 support includes health services, educational opportunities, 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.
- 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.
- Green spaces and trees will enhance quality of resident life, help reduce heat absorption and improve outdoor comfort. The MHC will enjoy green spaces, including an attractive, spacious, stimulating playground, to provide resident health, both physical activity and mental well-being.
- The Project Area does not require the MHC to be sited in a flood zone, wetlands, streams, or steep topography, but the Project will improve drainage systems and overcome prior lack of investment and disinvestment in environmental infrastructure. A robust water/sewer infrastructure and drainage systems is of essential value to this Project and the LMI households.
- Soil stabilization and stormwater management practices, such as retaining walls, terracing, and vegetative cover, will be used to stabilize housing and prevent erosion by managing runoff.
- SVdP will remediate any existing legacy pollution, reduce residents' exposure to harmful pollutants, and implement safe waste disposal practices and reducing, reusing, and recycling to minimize pollution.
- 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.

The resilience-building measures of each MHU, both in the MHC and purchased using the HLP, include:

- Structural reinforcement to prevent harm from tornadoes, high winds, and debris impacts.
- Energy-efficient building materials and designs, such as improved insulation, will help maintain cooler indoor temperatures and reduce energy costs for extreme heat. This will reduce energy consumption and costs, which is especially important for LMI households.
- 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.
- Fire-resistant building materials for new manufactured homes, construction, and landscaping reduce the risk of fire damage.
- Energy-efficient appliances and HVAC systems to reduce emissions from home heating and cooling, improving indoor air quality and reducing the community’s carbon footprint.
- “Green Smart home” technologies that optimize energy use and improve home safety.
- Every MHU will be built to HUD certification requirements construction standards and National Fire Protection Association (NFPA).
- 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.
- Roof and siding materials will be selected for high resistance to extreme weather conditions, including high winds, hail, and fire, reflecting sunlight, reducing heat absorption and cooling costs.
- Siding Material, such as 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, such as spray foam roof insulation, provides thermal resistance, reduces air infiltration, and is effective in sealing gaps and cracks, enhancing the energy efficiency of homes. Reflective insulation, such as a radiant OSB barrier, is used to reduce heat gain, which is particularly important in Georgia.
- State-of-the-art ducted mini-split systems featuring an impressive high energy-efficient rating reduce energy consumption.
- Vinyl thermal pane “Low-E” windows minimize winter drafts and reduce solar heat during the summer.
- Energy efficient doors with high insulation values and weatherstripping prevent air leaks and enhance thermal performance. Doors are also equipped with deadbolts.
- Efficient water heaters in new MHUs consume less energy and “smart thermostats” automatically fine-tune the home’s temperature, aligning to preferences and championing energy efficiency.

**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 upgrades existing infrastructure, including for climate resiliency, and the HLP enables homeowners to purchase new, state-of-the-art manufactured home that meets quality control standards as well as upgrade the site and utilities. In both activities, the community need for environmental justice is served.

In the Project Area, the per capita income in Hancock County, per the 2023 assessment of Georgia's Crescent Region, was less than \$20,000.<sup>3</sup> The Greene County 2019-2020 Comprehensive Housing Affordability Strategy (CHAS)<sup>4</sup> 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, it determined 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%.

Infusing the Project Area with this vitally needed and sorely lacking investment in safe, healthy, accessible housing is an advancement of environmental justice. The development of a minimum of 175 new MHU, between both programs, more than doubles the number of MHU in the Project Area that are less than 5 years old, as there are currently approximately 203 in the Project Area.

The new MHUs will operate efficiently and inexpensively. Transitioning renter households from substandard housing to the MHC will have a transformative impact on the household and also provide environmental benefit to the community by reducing blight. This will also benefit the household and the community when current MHU owners use the HLP to replace their substandard MHU to preserve their homeownership.

In the Project Area, communities of color are disproportionately impacted by blight and live in poor environmental conditions with inadequate infrastructure, and limited access to educational and employment opportunities. Both the MHC and the HLP help rectify this environmental injustice and provide access to new homes located in areas of opportunity.

#### **SUBFACTOR (b)(iv) COMMUNITY ENGAGEMENT**

**For every community you propose to support, describe how you will include and use input from stakeholders impacted by your proposed activities, such as manufactured housing residents, local governments, nonprofits, CDFIs, cooperatives, tenant advocates, fair housing organizations, manufactured housing developers, builders/general contractors, and unions. Describe what efforts you will take to engage and support participation by underserved communities and groups least likely to participate in the community.**

SVdP utilizes a 4-point plan to include and engage its diverse stakeholders in “A Place to Call Home”:

1. Widely circulating the draft application materials and notice of public meetings.

“A Place to Call Home” is featured on SVdP’s homepage, [www.svdpgorgia.org](http://www.svdpgorgia.org), which receives over 8,000 views each month. SVdP also placed ads in The Courier Herald and The Sparta Ishmaelite. A submitted article is pending with Eatonton Messenger. “A Place to Call Home”

has been posted on social media by SVdP and engaged community members in the Project Area. Notices and invites to meetings were also placed in COKAS and Episcopal Church of the Redeemer bulletins. SVdP has already hosted two community meetings- a virtual meeting and a hybrid meeting in-person and by zoom with over 85 attendees in person and 20 via zoom.

2. Direct outreach to stakeholders, including manufactured housing residents, local government officials, MHC owners, MHU residents, extremely low income and LMI households, immigrant communities, manufactured housing developers, banks, builders/general contractors, immigrant communities, and nonprofits.

SVdP conducted email outreach to over 100 individuals about “A Place to Call Home,” including members of these organizations and agencies: Advantage Behavioral Health, Atlantica Properties, BankSouth, Central Georgia Joint Development Authority, City of Eatonton, City of Greensboro, City of Siloam, City of Sparta, City of Union Point, City of White Plains, City of Woodville, Coldwell Banker, Daniel RP Management LLC (Reynolds Lake Oconee), Eatonton Housing Authority, Eatonton/Putnam Chamber of Commerce, Elks Lodge, First United Methodist Church Greensboro, Greene County Chamber of Commerce, Greene County Family Connection, Green County Government (Each Commissioner, Director of Building Planning & Zoning, Economic Development Director), Green County School (Counselor), Habitat for Humanity Greene County, Hancock County Government (Each Commissioner, Planning & Zoning Directors), Housing Authority of City of Greensboro, Housing Authority of the City of Sparta, Housing Authority of Union Point, Jordan Adams (MHC developer), Lake Oconee Lutheran Church, Legacy Homes (Territory Sales Manager, President, Plant Manager, Southeast Sales Manager, EVP), Neighbors Helping Neighbors, Putnam Christian Outreach, Putnam County Government (Each Commissioner, Planning & Zoning Commission, Director of Building Planning & Development), Putnam Development Authority, Reynolds Plantation, Rotary Club of Putnam & Greene Counties, St. Mary’s Good Samaritan Hospital.

3. Leverage partners and partners’ resources to expand communications, engagement, and input.

Between SVdP’s COKA caseworkers, Neighbors Helping Neighbors, Martha’s Closet, and the Greene County Family Connection communications, approximately 1,500 people in the Target Area are reached. Each organization is actively disseminating information to their networks. Importantly, each of these organizations directly serve vulnerable neighbors who face housing instability and can be beneficiaries of “A Place to Call Home.”

In advance of submission of its application, and in its on-going continued efforts, SVdP is marketing “A Place to Call Home” extensively to LMI households and protected classes, conducting outreach through local community organizations, social media, and housing fairs to ensure broad awareness and access. 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 also leverages its community partners to engage and support underserved communities and to seek their input. These partners include Victory Train, Inc., Helping Hands Crisis Relief Center, Greene County Habitat for Humanity, Circle of Love

Center, Inc., Goodwill, ViewPoint Health, and the Greene County Health Department. Members of each of these organizations have attended SVdP's PRICE community meetings via Zoom or in person.

4. SVdP solicits feedback in person, email, and via mail and is responsive to all feedback through the comment period and post-comment period.

Prior to its application submission, SVdP received over 40 emails in support of "A Place to Call Home" to its dedicated email address, engaged over 40 zoom meeting attendees, received one letter of support by postal mail, and engaged over 85 attendees at the community meeting. All of the feedback and support has been supportive and favorable. "A Place to Call Home" has been unilaterally supported by the community.

Several neighbors in need of immediate housing attended the community meeting and requested housing from "A Place to Call Home."

SVdP thoughtfully analyzes feedback and incorporates it "A Place to Call Home." Based on the input from its community engagement, SVdP has increased the amount of MHU in the MHC from 60 in the draft Application to 90 MHU in the MHC in its submitted application.

Please see Attachment H- Summary of Comments. Note: Barriers described in Factor (a) do not prevent successful project implementation.

#### **Alignment with Existing Community Plans and Policies:**

SVdP's "A Place to Call Home" is in firm accordance with the Project Area's Comprehensive Plans and Land and Building Regulations. The 2023 Greene County Comprehensive Plan<sup>10</sup> 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."<sup>11</sup> The Plan also specifies federal funding opportunities, particularly programs focused on the joint goals of affordability and walkability<sup>12</sup>.

SVdP's 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 zoned single family residence (SFR) but allows more density within the City of Greensboro, and 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 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.<sup>13</sup> In all ways, SVdP's proposal embodies the Project Area's Comp Plan.

"A Place to Call Home" is also deeply aligned with the State of Georgia's 2023-2027 strategic plan, which prioritizes strengthening rural Georgia and providing critical infrastructure.<sup>3</sup> The state's plan identifies that "[r]ural communities have fewer housing opportunities than more urban ones. Housing options tend to be single family, and in most rural communities, housing is not near employment, educational or other community opportunities. In order to help these smaller communities, remain viable; attract new residents and business, and succeed in the 21st century, Georgia will work to improve the number and variety of housing opportunities available."

The State of Georgia 2024-2025 Qualified Allocation Plan for the Georgia Housing Credit Program administered by Georgia Department of Community Development (DCA) also prioritizes development "in rural communities where few alternative rental housing options exist and multifamily development is difficult" and provides a state-designated basis boost for multifamily rural projects without DCA-administered federal funding as a source. This project delivers quality multifamily housing via the MHC and permanently affordable homeownership via the HLP, strengthens infrastructure, and increases the variety of housing options available. In all ways, it meets the State's plans and priorities.

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<sup>3</sup> <https://www.dca.ga.gov/sites/default/files/georgia-scrs-strategic-plan-2023-27-final-3.27.23.pdf>



## **“A Place To Call Home” Community Meeting Photos**

