



# DRGR Action Plan

12/22/25

## Table of Contents

I.	Action Plan Summary .....	3
II.	Resources and Budget.....	3
III.	Need .....	6
IV.	Use of Funds – Soundness of Approach.....	11
V.	Use of Funds – Method of Distribution.....	27
VI.	Grantee and Partner Capacity .....	28
VII.	Stakeholder Engagement and Public Participation Summary.....	34
VIII.	Long-Term Effect of Affordable Housing Options in Oregon .....	35

## **I. Action Plan Summary**

Oregon is facing a critical affordable housing shortage. Manufactured housing plays a vital role in addressing this need. Oregon is home to over 1000 manufactured home parks, yet 80% of the state's inventory was built before 1995, and 40 % before 1976, making much of it outdated, energy-inefficient, and unsafe. Additionally, as Manufactured dwelling parks go on the market, whole communities are in jeopardy of being displaced.

Oregon Housing and Community Services (OHCS) is committed to advancing long-term housing affordability, stability, resiliency, and energy efficiency for low- and moderate-income (LMI) households residing in manufactured homes and communities. OHCS has developed a suite of programs to preserve and improve this housing stock but demand far exceeds available resources. FY23/24 PRICE Main grant funding comes at a critical time and will enable OHCS to leverage proven program frameworks, a statewide network of experienced partners, internal policy expertise, and state investments that are strategically aligned with federal funding opportunities.

In response to the Preservation and Reinvestment Initiative for Community Enhancement (PRICE), OHCS will increase activities within to two existing programs:

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

The proposed activities are designed to meet the requirements outlined in the PRICE Notice of Funding Opportunity (NOFO) (FR-6700-N-99, issued February 28, 2024), authorized under the Consolidated Appropriations Act, 2023 (Public Law 117-328, approved Dec. 29, 2022). This work will enable OHCS to continue efforts to lead nationally in manufactured housing development and preservation, backed by proactive policies, robust investments, and strong collaborative partnerships.

## **II. Resources and Budget**

Below is a budget summary including the PRICE funds (grant award amount and estimated program income, if applicable), the total leveraged/matching funding or non-financial contributions (if applicable), and the total budget (total of PRICE funds plus any leveraged funding).

## Budget for MHRRP Repair and Replacement Program

Expense	Revised Total
Staff (labor)	\$727,719
Fringe	\$227,977
Transportation	\$3,010
NEPA Reviews	\$225,000
Environmental	\$150,000
DOJ	\$7,260
Relocation	\$40,000
MH park acquired grants	\$4,000,000
MH park infrastructure	\$2,000,000
MHP repairs / rehabs	\$2,250,000
MHP replacements	\$3,500,000
MHP decommissioning	\$390,000
<b>Total Expenses</b>	<b>\$13,520,966</b>

**Additional funds:** OAHTC: \$20 million

OHCS is proposing a comprehensive budget of \$13,750 million on PRICE Main resources and \$20 million in equity generating from the Oregon Affordable Housing Tax Credits (OAHTC). This budget breakdown reflects OHCS' strategic approach to leveraging multiple funding sources on park preservation, home repairs, and environmental review and compliance. The \$20 million OAHTC allocation designated for preserving manufactured dwelling parks is supported and renewed biennially by the Oregon Legislature. The agency will make this level of resource available over the course of the six-year program period, allocating in careful coordination with housing development projects and other preservation work.

OHCS plans to utilize the full allowable administrative maximum of 10% of total grant resources, \$1.3 million, for all administrative costs associated with managing this initiative ensuring efficient distribution, oversight, and compliance with grant requirements. Repair and rehabilitation grants have been budgeted at \$2.5 million, projected to deliver more than 300 individual completed home repair and rehabilitation grant projects.

OHCS will dedicate \$3.5 million to replacement forgivable loans, that will replace at least 30 unsafe, energy-inefficient units with new healthy homes. With \$6.0 million targeted for park preservation projects, staff believe this will

result in 3-4 preserved park communities. An amount of \$275,000 will be designated for environmental review compliance and any third-party contacting needs, and an additional \$150,000 for any environmental mitigation needs.

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

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

**Note:** OHCS will not include these resources in the Detailed Budget Worksheet (HUD- 424BW) because although the agency does have additional resources to pair with PRICE Main funds, the timing of future availability is undetermined. Funding Distribution Repair Grants. Community action agencies (CAAs) will coordinate with OHCS to facilitate funding distribution. Homeowners will not be required to manage grant funding. Replacement Forgivable Loans. OHCS will make payments directly to manufactured home producers after the homeowners select their new home. The Manufactured Housing Program Navigator will work with homeowners to develop a budget and to select their replacement.

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

**Budget Determination:** The revised budget for the HUD PRICE Grant was determined by researching Oregon's manufactured housing needs. Below are listed the specific details considered and researched:

- Oregon Housing needs

- Risk of Conversion of Oregon's Manufactured Dwelling Communities
- Low- and moderate-income (LMI) households in need
- Hazards, Health, and Safety Issues in Substandard Housing Impacting Availability
- Substandard and Dated Manufactured Housing
- Manufactured Home Repair and Rehabilitation Program needs
- Manufactured Dwelling Park Preservation needs
- Barriers to Manufactured Housing Preservation and Rehabilitation in Oregon
- Timing and Sufficient Resources
- High Land Values
- State Infrastructure

### III. Need

OHCS was awarded the PRICE Main for \$13,750,000. It will be split between two programs, the Manufactured Home Repair and Replacement Program (MHRRP) and the Manufactured Dwelling Preservation Program (MDPP), each receiving \$6,875,000 for each program. The geographical scope is the State of Oregon.

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

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

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

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

**Risk of Conversion of Oregon's Manufactured Dwelling Communities:** The loss of manufactured home parks to redevelopment poses a significant threat to affordable housing options for low-income residents in Oregon. The Network for Oregon Affordable Housing (NOAH) cites nearly 140,000 manufactured homes in Oregon with 62,000 located in a little more than 1,000 privately owned manufactured home parks. CASA of Oregon has identified approximately eight parks that currently meet eligibility criteria for preservation: totaling roughly \$30 million in needs.

**Low- and Moderate-Income (LMI) Households in Need:** The U.S. Census Bureau reports that about 30% of Oregon households have incomes below 80% of the AMI, highlighting the substantial need for affordable housing options across the state. Internal OHCS data indicate that more than 100,000 households in Oregon are eligible for rental assistance but are unable to access it due to limited resources.

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

### **Hazards, Health, and Safety Issues in Substandard Housing Impacting**

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

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

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

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

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

level in 2023 and the Manufactured Home Replacement Program was fully expended within the first six weeks of the 2023-25 biennium.

The program was able to assist 19 income-qualified LMI owners of manufactured homes and received more than 80 additional income-qualified applications that the agency will address when resources are available. The program's general voicemail and email continue to receive inquiries from owners of deteriorating manufactured homes suffering from leaking roofs, unstable/caving floors, plumbing issues, exposed wiring, mold, and mildew, among other health and safety hazards. Those contacting OHCS are LMI homeowners seeking assistance to repair or replace their homes because they have few to no other sources of funds to do so themselves and no alternative housing options.

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

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

**Disaster Resiliency for Oregon's Wildfire Season:** The 2022 wildfire season had a devastating for the State of Oregon. Several fires caused catastrophic damage to the manufactured housing inventory throughout the nine wildfire affected counties. According to CASA of Oregon, 1,500 manufactured homes were destroyed, 18 manufactured home communities were either destroyed or severely damaged. About 6,000 manufactured housing residents were displaced. In response to this tragic fire season, many manufactured home producers in Oregon offer homes that are built to Exterior Fire Resistant Construction System Certification. With a modest price increase, these standards include Class A roofing materials, non-combustible cladding, soffits with spark ember arresting vents, and fire rated tempered windows.

Since the 2020 wildfire season, Oregon's building codes, for fire prone areas, have drastically changed. There are now requirements for outdoor building materials, escape egresses, and expanded home ignition zones. In addition, Oregon has experienced severe weather, and small seismic events. In response to this, Oregon has changed building codes for manufactured homes in or near flood plains and increased seismic placement codes. State of Oregon is also requiring manufactured homes, in or near flood plains, to be placed on stilts or other flood mitigating requirements. Building codes have also increased tie down and strapping standards to decrease the amount of damage during a seismic or weather event.

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

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

**Timing and Sufficient Resources:** As with multifamily rental properties, many manufactured home parks can fetch a higher price on the open market making a timely and nimble response from public funders is essential to successfully competing with for-profit buyers. Limited financing options for purchasing manufactured homes, lots, and cooperative ownerships present barriers to homeownership for low- and moderate-income households. Oregon's housing stakeholders often advocate collectively at the local, state, and federal level for manufactured housing resources to use as bridge loans for manufactured home communities to preserve affordability in their parks and avoid conversion to market-rate housing development. While bridge financing from other nonprofit lenders has been essential to facilitate cooperative and nonprofit partners acquiring projects, all partners would benefit from more clarity and certainty about OHCS' ability to financially back some of these transactions.

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

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

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

## **IV. Use of Funds – Soundness of Approach**

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

Oregon is a national leader in manufactured housing development and preservation, and Oregon Housing and Community Services (OHCS) offers a suite of programs tailored to address the diverse needs of manufactured homeowners, residents, and park communities across the state. Oregon's longstanding commitment to manufactured housing is demonstrated through proactive approaches to policy development, significant state and local resource investment, and collaborative partnerships with experienced stakeholders. To most effectively administer and rapidly deploy PRICE Main grant resources ensuring long-term affordability, resilience, energy efficiency, and housing stability, OHCS plans to modify two current, successful program frameworks to conform to HUD PRICE requirements and continue equitable, transparent statewide opportunities to access funds. Both the Manufactured Home Repair and Rehabilitation Program (MHRRP) and Manufactured Dwelling Park Preservation (MDPP), with program modifications outlined below, achieve several key shared goals of the agency and the PRICE NOFO.

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

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

## Program Framework

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

## Key Program Elements

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

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

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

1. Applicants must own the current manufactured home and use it as their primary residence to qualify for replacement. OHCS does not replace second homes, rental properties, or vacation homes.  
**PRICE modification:** This eligibility criterion will be used for the new repair/rehabilitation prioritization component.
2. Applicants' current manufactured home must be energy inefficient/built before (NEEM Rated) 1995 to be eligible for replacement.  
**PRICE modification:** Homes built prior to 1976 will be replaced according to PRICE guidelines. All manufactured homes built after 1976 will be eligible for PRICE repairs.
3. Applicant's manufactured homes must be located on personally owned property, in a cooperative or nonprofit owned park, or in a privately owned park that has a written affordability agreement with OHCS.  
**PRICE modification:** This eligibility criterion will be used for the new repair rehabilitation prioritization component.
4. Applicants' household income must be at or below 100% of Oregon's AMI: \$72,000 for a family of two in 2022.  
**PRICE modification:** Household income eligibility will adhere to HUD rules.
5. Participants must commit in writing that should they sell their home before the end of the 15-year forgivable loan term that they will comply with one of the following:
  - a. Pay the outstanding balance of the loan;

- b. Sell the home to an income-qualified buyer who agrees to assume the loan; or
- c. Demonstrate a hardship impeding homeowner's ability to pay back the loan (e.g., death)

**PRICE modification:** Recipients must sell their home to another MHRRP eligible buyer.

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

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

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

### **Program Framework**

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

1. An applicant submits an intake form to OHCS, and an account is created.
2. OHCS staff reviews application materials to ensure MDPP requirements and eligibility criteria are met.

3. When program requirements are met, and supplemental documentation is submitted, OHCS staff review and bring the project to OHCS' Finance Committee for final approval.
4. Assuming OHCS has sufficient preservation resources, applicants are awarded upon Finance Committee approval.

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

For cooperatives and nonprofits, a purchase or sales agreement must be reviewed by OHCS. Affordability restrictions enforced through deed restrictions require that at least 60% of the park spaces are rented at lease-up to residents earning 80% of AMI or less for at least 60 years.

### **Goals for Proposed Activities**

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

1. **Wealth-building and wealth protection for LMI households:** preservation ensures that current homeowners are not priced out of their communities by facilitating the purchase of the park by residents or a nonprofit entity. Repair and rehabilitation efforts will help homeowners protect the value, health, and safety of their home.
2. **Strengthen environmental justice efforts:** Repair and rehabilitation resources will allow the agency to assist more homes in the removal of toxic materials from older manufactured homes as well as assist with energy upgrades that will lower carbon emissions. Repairing, rehabilitating, and replacing substandard manufactured housing will provide residents with healthy homes and reduce health risks associated with asbestos, black mold, and lead. Park preservation will address deferred infrastructure maintenance issues that often have life threatening impacts on tenants.
3. **Promote homeownership opportunities:** Through the repair and rehabilitation of current manufactured homes coupled with funds for replacement of homes built prior to 1976 (or in a condition such that rehabilitation is not feasible) with new, energy efficient manufactured

- homes, homeowners' assets will remain valuable, affordable, sustainable, and healthy for future LMI homebuyers.
4. **Increase housing support and affordability to LMI persons across Oregon including urban, rural, and Tribal lands:** Proposed activities prioritize statewide access and equitable distribution of resources. Oregon's current manufactured housing inventory is evenly distributed between rural and urban communities. By repairing and rehabilitating homes in Oregon, we can work to ensure the distribution of resources throughout the state. The 17 CAAs providing repair and rehabilitation are located in all 36 counties across Oregon.
  5. **Preserve and revitalize existing manufactured housing and manufactured housing communities:** Both current preservation and replacement activities protect the state's current manufactured housing stock, and with the addition of PRICE funds these efforts will go further and include repair and rehabilitation activities.
  6. **Support repairs, rehabilitation, and replacement of Oregon's deteriorating manufactured homes:** Estimates in Oregon indicate that roughly 80% of all manufactured homes in the state were built before 1980. Roughly 60% of these pre-1980 manufactured homes in Oregon are owned and occupied by families with household incomes below 80% of AMI. The proposed activities represent the agency's statewide view of the most pressing needs and opportunities for most sustainable impact.
  7. **Energy efficiency and resilience:** By repairing and rehabilitating aging, maintenance deferred manufactured homes, replacing pre-1976 manufactured homes with energy-efficient homes, and investing in infrastructure upgrades, OHCS will enhance the sustainability and resilience of manufactured housing communities, reducing utility costs for residents and mitigating environmental impact and updating health and safety standards.
  8. **Resident and nonprofit ownership models:** Preservation resource programming supports resident ownership models, such as cooperative ownership and limited equity cooperatives, to empower residents to gain a voice in how their community is managed, build community wealth, and preserve affordability for future generations.

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

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

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

The number of applications for the 2023-25 biennium received for the Manufactured Home Replacement Program quickly oversubscribed the \$2.5 million in resources allocated to the program. A significant number of repair requests, reaching upwards of 700, continue to go unaddressed.

As of January 2024, the program received 75 replacement applications that cannot be served, and the Program continues to receive applications weekly. PRICE funds will address current and future requests. OHCS expects to continue to receive requests for repair and replacement through the 2023-25 biennium and beyond.

## **Timeline and Key Tasks**

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

Update Oregon Administrative Rules (OARs) in order ensure public transparency with regard to changes to current programs needed be in compliance with PRICE rules.

Notify the Oregon Housing Stability Council of announcement of award. The Council, with the advice of the Executive Director of OHCS, meets monthly to direct policy, and has approval authority on program frameworks and standards for those supported with state resources and certain loans and grants.

Oregon Department of Justice (DOJ) review will be required to approve loan and grant agreements that will be used for PRICE programs. To expedite the DOJ review process, the agency will use current templates to build PRICE adjustments.

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

The Manufactured Repair and Rehabilitation Program team will coordinate with the Energy Services Section to begin outreach with CAAs and nonprofit partners to contract for manufactured home assessment.

The Manufactured Housing Section of OHCS' Homeownership Division will partner with the existing network of CAAs to provide assessments and referrals to OHCS for review. These staff will also partner with the Energy Services Section to identify other manufactured homes needing repair and rehabilitation.

### **Timeline**

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

### **Key Dates**

- March 2025 – Consult with Oregon Department of Justice (DOJ) and finalize approval process and required documentation.
- June 2025 – Draft revised OARs to comply with all PRICE grant requirements.
- August 2025 – Launch Manufactured Home Repair and Rehabilitation Program.

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

Update program requirements to ensure August 2025 rent program framework complies with PRICE funding and federal requirements. Update all application materials to include federal requirements. Planning for completion of environmental review requirements. Draft new a program manual outlining all requirements, including federal PRICE rules. Ensure grant agreements include federal requirements.

## **Projected Activity Impact**

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

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

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

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

With PRICE resources designated for park preservation, OHCS estimates that its grant request could serve nearly 450 households per external partners estimates and recent summary of funding needs. On average, park preservation has ranged around \$55,000/space. The PRICE funding would offer much increased availability of funds to ensure that people living in manufactured parks can stay in their owned, affordable housing long term. This would enable seniors to age in place and other low-income households to have a sustainable and affordable place to live. In some small rural communities in Oregon, manufactured parks may be one of the only options for affordable homeownership. The MDPP program supports preservation of this resource through a provision of funding for acquisition of parks by nonprofits and resident-owned cooperatives as well as infrastructure improvements.

### **Ensuring Affordability and Equity**

Enforcing affordability requirements and creating income-restricted housing options for Oregonians on low incomes is the cornerstone of OHCS' mission. The agency accomplishes this through formal written binding agreements with recipients of public funds, leveraging federal, state, and local resources to provide funding packages for affordable housing development, and OHCS will balance affordability with the opportunity to build financial security and wealth for owners of manufactured homes through maintaining and improving their

current home asset by receiving a repair and rehabilitation grant, or through replacement of their home with 15-year forgivable, no interest, zero payment loans in the MHRR program.

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

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

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

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

HUD expects that in communities where the tenant of a manufactured housing unit rents the unit and/or the pad, the community will maintain or adopt tenant site lease protections consist with or greater than those required by Fannie Mae or Freddie Mac. Examples of applicable requirements include:

- Notice of rent increases
- Renewable leasing structures
- Right to purchase or sell
- Right to sublease
- Advanced notice of planned sale or closure of a community

### **Resident Protections through Proposed Activities**

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

The Manufactured Home Repair and Rehabilitation Program eligibility terms require that participating homes be located in a nonprofit or cooperative owned facility, on private land owned by the program participant, or in a privately owned manufactured home park that has entered into a written regulatory agreement with OHCS. Significant marketing efforts will be placed for

MHRRP in nonprofit, cooperative-owned preserved parks as these facilities are committed contractually to maintaining affordable space rent and income eligibility limits for residents.

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

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

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

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

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

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

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

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

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

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

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

### **Hazard Mitigation**

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

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

**Seismic Retrofitting:** Implement structural enhancements to manufactured homes to withstand seismic forces, including foundation anchoring systems, bracing, and reinforcement of structural elements.

**Floodplain Management:** Conduct flood risk assessments and implement floodplain management measures, such as elevating manufactured homes,

constructing flood barriers, and implementing stormwater management systems.

**Fire Mitigation:** Implement fire-resistant construction materials and landscaping practices, create defensible space around homes, and establish emergency evacuation plans to mitigate the risk of wildfires.

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

**Wind-resistant Design:** Retrofit manufactured homes to improve resistance to high winds, including installation of wind-rated roofing materials, window shutters, and tie-down systems.

**Stormwater Management:** Implement stormwater management measures, such as drainage systems, retention ponds, and erosion control measures, to reduce the risk of flooding and water damage during severe storms.

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

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

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

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

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

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

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

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

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

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

## **Environmental Justice Considerations**

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

### **1. Reducing or Mitigating Exposure to Environmental and Health Hazards.**

OHCS will prioritize the reduction and mitigation of exposure to environmental and health hazards for environmentally underserved, overburdened communities, including low-income and Black and Brown communities. Activities will focus on utilizing weatherization resources, employing energy efficient homes, using fire-resistant building materials to improve indoor air quality, and sewer/water infrastructure improvements. PRICE resources for repair and rehabilitation will update home heating systems, insulation, roofing, and plumbing, among other features of the home as recommended by a professional home audit with modern, energy efficient, environmentally conscious home equipment and materials. Home repair and rehabilitation will improve indoor air quality by mitigating energy leaks, moisture, mold, and mildew. When home replacement is required, the new manufactured home purchased via MHRRP forgivable loans must be ENERGY STAR or NEEM 2.0 rated. The home heating equipment required for these energy ratings not only provides a cost savings for the homeowner, it also improves home indoor air quality. One of Oregon's major and more affordable manufactured

home builders uses low VOC materials in every home they build which greatly improves home indoor air quality.

## **2. Supporting Culturally Specific Housing Organizations**

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

## **3. Community and Stakeholder Engagement Plan**

OHCS enjoys a robust and engaged network of legislative champions, manufactured housing developers, manufactured home builders, nonprofits, and experienced staff with deep experience in the manufactured housing space. This application is a reflection of the work in which the agency and external partners have already engaged and possesses a shared vision for addressing the state's most critical manufactured housing needs. There is significant statewide interest in the PRICE grant opportunity. In addition to the external collaboration included in the application, the agency's Community Engagement Section of the Public Affairs Division has crafted the following stakeholder engagement plan in collaboration with our Homeownership and Affordable Rental Housing Divisions.

## **4. Public Engagement Accomplishments**

- a. Add a link to all application materials on OHCS homepage and ensure ease of navigation to the OHCS PRICE Main Grant webpage.
- b. Host one virtual public hearing and one hybrid/in-person/virtual public hearing. OHCS will provide Spanish and ASL interpretation in the hearings.
- c. Public Hearing: Present full application materials to participants, walk through the feedback and input process, and answer initial questions interested parties have at the beginning of the public comment period.

- d. Present a summary of input received by the public and how it will be integrated into the application. Take remaining public comments.
- e. Post recordings and presentation slides of both public hearings on the PRICE Main Grant webpage.
- f. Issue technical advisories with information on virtual and in-person public hearings through the agency's extensive email distribution lists.
- g. Disseminate a survey with questions covering the OHCS application materials.
- h. Offer public feedback opportunities via traditional mail, email, during public hearings, in community meetings, and online survey.
- i. Conduct a thorough analysis of all external stakeholder feedback and integrate input to the greatest extent possible that still guarantees compliance with PRICE Main rules, efficient delivery, and transparent access to funding statewide. Analysis will also be included in Exhibit H Summary of Comments.
- j. Remain responsive to external partner outreach throughout the public comment period scheduled for a total of 17 days: June 4-20.
- k. Provide application presentations at stakeholder meetings, culturally specific development partners, and regular meetings hosted by OHCS.
- l. Publish and maintain a frequently asked questions (FAQ) document on the PRICE Main Grant webpage in both English and Spanish.
- m. Share public hearing information with the Oregon State Legislature, home to many manufactured housing legislative champions who will participate in hearings and circulate information with their districts, community leaders, and constituents.
- n. Collaborate with the Communications Section to share information in OHCS newsletters and social media posts.
- o. Maintain grant application and program information on OHCS' Manufactured and Marina Communities webpage with resources, program information, and directories.

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

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

## **HUD Comprehensive Plan**

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

## **OHCS Preservation Strategy Framework**

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

## **Oregon Land Use Law**

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

## **Fair Housing Rules**

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

## **Local Planning and Priorities**

Through the development of this application package, reinforced during the public comment process, we will ensure that the application proposal represents a wholistic statewide view of the need.

## **V. Use of Funds – Method of Distribution**

This section is not applicable as the State of Oregon will carry out PRICE activities directly.

## VI. Grantee and Partner Capacity

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

Since its inception 35 years ago, OHCS has been responsible for funding more than 75,000 units representing over \$5 billion invested in affordable housing. In the 2023-25 biennium alone, OHCS secured \$1.14 billion from the Oregon Legislature to continue addressing the state's ongoing affordable housing crisis. OHCS provides resources for Oregonians to reduce poverty and increase access to stable housing. The focus on both housing and community services allows the agency to serve Oregonians holistically across the housing continuum, including preventing and ending homelessness, assisting with utilities, providing housing stability support, financing multifamily affordable housing, weatherization, and opportunities for homeownership.

### **Proposing, Implementing, Managing, and Coordinating Community Development**

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

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

1. The Affordable Rental Housing Division (ARH) has been working with external partners on manufactured dwelling park preservation for nearly 30 years with roughly \$60 million in investments in the state's

- manufactured housing communities. Manufactured Dwelling Park Preservation remains in high demand even as available funds ebb and flow.
2. The Homeownership Division (HOD) will leverage existing partnerships, expertise, and operations from the Manufactured Home Replacement Program to stand up the Manufactured Home Repair and Replacement Program (MHRRP) with PRICE Main resources. The Manufactured Home Replacement Program delivered almost \$6 million to replace nearly 30 homes for LMI Oregon families.
  3. The Disaster Recovery and Resilience Division (DDR) was established in response to the massive destruction of the 2020 Labor Day wildfires and straight-line winds. OHCS was allocated \$150 million by the Oregon Legislature to support housing and community recovery and has used existing and developed new programs to support the development of permanent replacement housing, including manufactured homes, infrastructure repair, and rent and housing navigation assistance for Oregonians impacted by the fires. DRR is focused primarily on implementing a series of programs, called ReOregon, funded by a \$422 million HUD CDBG-Disaster Recovery grant.

### **Partner and Client References**

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

- CASA of Oregon, Lisa Rogers – Deputy Director  
[lrogers@casaforegon.org](mailto:lrogers@casaforegon.org)  
503-687-3306  
casaforegon.org
- Community Action Partnership of Oregon (CAPO), Janet Allanach – Executive Director  
[janeta@caporegon.org](mailto:janeta@caporegon.org)  
503-789-7451  
caporegon.org

- Energy Trust of Oregon (ETO), Mark Wyman – Senior Manager, Innovation and Development Strategies  
[mark.wyman@energytrust.org](mailto:mark.wyman@energytrust.org)  
503-445-2950  
energytrust.org
- Network for Affordable Housing (NOAH), Ann Remmers – Executive Director  
[ann@noah-housing.org](mailto:ann@noah-housing.org)  
503-223-3211  
noah-housing.org
- St. Vincent DePaul of Lane County, Kinser Fleming – Property Management Director  
[kinser.fleming@svdp.us](mailto:kinser.fleming@svdp.us)  
541-321-3666  
svdp.us

### **Federal Grant Management Experience**

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

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

### **HUD Community Planning and Development (CPD) Programs**

As a HUD grantee for HUD CPD entitlement funding, OHCS currently administers HOME, Federal Housing Trust Fund (HTF), HOME-ARP, CDBG-DR, NSP, and Emergency Shelter Grant (ESG) funding. These resources fund housing and

services that address community needs identified in the Consolidated Plan and Annual Action Plan, including the Analysis of Impediments to Fair Housing. Current OHCS staff ensure compliance with federal cross cutting requirements and the regulations associated with each funding source, including ongoing compliance and affordability requirements. OHCS has been a HUD Project-Based Contract Administrator (PBCA) for more than 20 years, performing inspection, monitoring, and project-based subsidy payments duties through our HUD Contract Administration (HCA) in the Affordable Rental Housing Division. The agency performs compliance monitoring for HUD-specific programs throughout the state utilizing TRACS, EIV, iREMS, iMAX, and eLOCCS for its compliance reporting.

### **Administration of Development Grants and Tax Credits**

In addition to HUD CPD and MFH programs, OHCS also administers federal Low-Income Housing Tax Credits (LIHTC), Oregon Housing Development Grant Program (HGDP), General Housing Account Program (GHAP), Oregon Multifamily Energy Program (ORMEP), Oregon Affordable Housing Tax Credit (OAHTC), Preservation Resources, Manufactured Dwelling Park Preservation (MDPP), Agricultural Workforce Housing Tax Credit (AWHTC), Modular Housing Development Fund (MHDF), Permanent Supportive Housing (PSH) Project-based Rent Assistance and Services Funding, and Co-Location of Affordable Rental Housing and Early Care (CARE). Responsible for the compliance of more than 1,400 properties, OHCS has active oversight through the Portfolio Administration (PA) Section. For compliance, Compliance Officers provide ongoing inspection, record maintenance, and management review responsibilities. PA also includes Asset Management professionals who provide fiscal assistance and risk management oversight for the entire OHCS housing portfolio. All units with federal funds are required to comply with Section 504 as outlined in the agency's Core Development Manual (CDM).

### **OHCS Success Story**

A recently programmed fund, HOME-American Rescue Plan (ARP), is an example of OHCS utilizing a federal resource to meet local needs. HOME-ARP was programmed to provide housing with supportive services to rural areas of the state that often are unable to build projects large enough to make a Permanent Supportive Housing (PSH) program cash flow. By pairing HOME-ARP with state capacity building resources and leveraging local PHA project-based rent assistance and other types of rental support, OHCS coordinated local

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

### **OHCS Key Staff and Program Management Roles**

In addition to a strong network of dedicated external manufactured housing partners, OHCS is fortunate to have knowledgeable, seasoned, and passionate staff designing, administering its programs. OHCS does not anticipate need for additional staff to administer the full grant request amount within the program rules.

Having the key staff positions demonstrates OHCS' capacity and readiness to hit the ground running, if awarded. As a state agency with experienced management, significant oversight from the state legislature, and critical support staff and expertise, contingency planning is built into every implementation process. Agency executive leadership reprioritizes staff and resources as needed to comply with all federal and state program compliance obligations. Like other organizations, OHCS experiences staff turnover, initiative swings, and other obstacles that could result in staffing changes. However, due to its size, structure, and resources, OHCS is confident that any unforeseen challenge will not result in program delays.

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

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

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

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

- Talia Kahn-Kravis, Assistant Director of Homeownership Programs, Homeownership Division

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

- Dan Elliott, Senior Operations and Policy Analyst

Resource and Tax Credit Leverage Management | OHCS Affordable Rental Housing Division, Development Resources Section

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

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

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

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

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

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

## **VII. Stakeholder Engagement and Public Participation Summary**

OHCS enjoys a robust and engaged network of legislative champions, manufactured housing developers, manufactured home builders, nonprofits, and experienced staff with deep experience in the manufactured housing space. This application reflects the work in which the agency and external partners have already engaged and possesses a shared vision for addressing the state's most critical manufactured housing needs. There is significant statewide interest in the PRICE grant opportunity. In addition to the external collaboration included in the application, the agency's Community Engagement Section of the Public Affairs Division has crafted the following stakeholder engagement plan in collaboration with our Homeownership and Affordable Rental Housing Divisions.

### **Public Engagement Accomplishments**

1. Add a link to all application materials on OHCS homepage and ensure ease of navigation to the OHCS PRICE Main Grant webpage.
2. Host one virtual public hearing and one hybrid/in-person/virtual public hearing. OHCS will provide Spanish and ASL interpretation in the hearings.
  - a. Public Hearing 1: Present full application materials to participants, walk through the feedback and input process, and answer initial questions interested parties have at the beginning of the public comment period.

- b. Public Hearing 2: Present a summary of input received by the public and how it will be integrated into the application. Take remaining public comments.
3. Post recordings and presentation slides of both public hearings on the PRICE Main Grant webpage.
4. Issue technical advisories with information on virtual and in-person public hearings through the agency's extensive email distribution lists.
5. Disseminate a survey with questions covering the OHCS application materials.
6. Offer public feedback opportunities via traditional mail, email, during public hearings, in community meetings, and online survey.
7. Conduct a thorough analysis of all external stakeholder feedback and integrate input to the greatest extent possible that still guarantees compliance with PRICE Main rules, efficient delivery, and transparent access to funding statewide. Analysis will also be included in Exhibit H Summary of Comments.
8. Remain responsive to external partner outreach throughout the public comment period scheduled for 17 days: June 4-20.
9. Provide application presentations at stakeholder meetings, culturally specific development partners, and regular meetings hosted by OHCS.
10. Publish and maintain a frequently asked questions (FAQ) document on the PRICE Main Grant webpage in both English and Spanish.
11. Share public hearing information with the Oregon State Legislature, home to many manufactured housing legislative champions who will participate in hearings and circulate information with their districts, community leaders, and constituents.
12. Collaborate with the Communications Section to share information in OHCS newsletters and social media posts.
13. Maintain grant application and program information on OHCS' Manufactured and Marina Communities webpage with resources, program information, and directories.

## **VIII. Long-Term Effect of Affordable Housing Options in Oregon**

Designed to ensure the long-term affordability of housing without federal subsidy, the proposed combination of targeted interventions, affordability enforcement mechanisms, and cooperative ownership models via both the

Manufactured Home Repair and Rehabilitation Program (MHRRP) and Manufactured Dwelling Park Preservation (MDPP), the agency and its partners will continue creating an enduring impact on housing stability, affordability, and community resilience for low- and moderate-income households in Oregon. The proven outcomes from these bold efforts demonstrate that the proposed activities already have.

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

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

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

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

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

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

Affordability agreements are also established for manufactured home parks receiving preservation funding through the MDPPF. These agreements ensure that lot rents and other fees remain affordable for residents, even as improvements are made to the park's infrastructure will support the preservation of manufactured home parks through infrastructure upgrades, rehabilitation

projects, and tenant protections preventing displacement. By working with park owners and tenants to establish affordability agreements, we protect LMI households from being priced out of their communities.

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

### **Stable Homeownership**

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

### **Supporting Underserved Communities**

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

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

This program will prioritize underserved communities and vulnerable populations by ensuring equitable access to repair and rehabilitation assistance for owner-occupied manufactured homes. With home improvements, we aim to address

disparities in housing quality and promote equitable access to safe and healthy housing options. The MHRRP allows residents to repair their homes, which allows families to remain in their homes safely. Repairing manufactured home assists in protecting not just the underserved populations' assets, but a critical wealth-building opportunity.

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

Residents of manufactured home parks receiving preservation funding through the MDPPF to move to a cooperative management model receive financial counseling and transition assistance from trusted external partners facilitating the transaction. This helps them navigate affordability challenges and ensure that housing costs remain within their means over the long term. By partnering with stakeholder organizations, community leaders, and resident associations, we aim to build trust, foster collaboration, and empower these communities to advocate for their housing needs and priorities. Through tailored, individual, and family-centered approaches, equitable policies, and community partnerships, we aim to address systemic disparities in housing quality, promote economic power, and create pathways to long-term stability and prosperity for vulnerable populations, particularly those of color, in manufactured housing communities across the state.

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

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

Through targeted repairs and rehabilitation efforts, the program addresses health and safety hazards in manufactured homes, such as mold, lead paint, and asbestos. It is irrefutable that substandard housing conditions have adverse effects on resident health, particularly for vulnerable populations. By improving indoor air quality and eliminating hazards, we reduce health risks and create healthier living environments for residents. Repair and rehabilitation of older manufactured homes will extend their lifespan, allowing residents to remain in sustainable affordable long-term housing, rooting households within their communities supporting family stabilization. These efforts will increase the number of energy efficient homes while reducing utility costs residents.

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

Program supports initiatives to reduce environmental hazards in manufactured home parks, such as soil remediation, water quality improvements, and pollution

controls. Data from the Oregon Environmental Council indicates that manufactured home parks are often located in areas with higher levels of environmental pollution, posing risks to resident health. By implementing mitigation measures and environmental protections, we create safer, more sustainable communities for residents to live and thrive. The preservation of manufactured home parks through infrastructure upgrades, rehabilitation projects, and tenant protections have been instrumental in facilitating the formation of cooperatives to buy and operate parks collectively, preserving affordability and community stability. These two programs are strategically designed to address the long-term housing needs of the most vulnerable households in Oregon. Through the use of these tools, interventions, partnerships with community stakeholders, and innovative financing mechanisms, we aim to ensure the sustainability, affordability, and resilience of manufactured housing communities for years to come.