

Exhibit A Executive Summary

**Piedmont Triad
Regional Council**

The ***Piedmont Triad Manufactured Housing Community Empowerment and Enhancement Initiative*** will develop a comprehensive program designed to address the diverse needs of various manufactured housing communities (MHCs) across the Piedmont Triad region in North Carolina. This program empowers MHC residents to envision improvements and enhancements in communities through community engagement and design charrettes. Community improvements and enhancements desired by MHC residents will be implemented to promote long-term stability, resilience, and community pride.

Utilizing HUD funding for the Preservation and Reinvestment Initiative for Community Enhancement (PRICE), the initiative will prioritize infrastructure upgrades, community enhancements, accessibility modifications, and aging-in-place initiatives in at least twelve MHC's in the Piedmont Triad. These efforts aim to meet safety standards, enhance aesthetics, support aging in place, and withstand extreme weather events while identified through community-based design charettes. Community improvements include, but are not limited to:

- **Resilient Infrastructure improvements** (Access improvements, water/sewer and/or septic improvements and repairs, etc.) (*Aligns with Goal #4 - in NOFO pg. 10*)
- **Safety and Efficiency Upgrades** – Weatherization, Accessibility & Aging in Place improvements (Accessible ramps and ADA improvements to individual units) (*Aligns with Goal #1 in NOFO pg. 9*)
- **Livable Community Enhancements** (Common/recreational areas such as playgrounds and picnic tables, lighting installation, landscaping etc.) (*Aligns with Goal #4 - in NOFO pg. 10*)

Implementation Strategy

To address these challenges comprehensively, the initiative combines infrastructure improvements, community enhancements, accessibility modifications, and resident empowerment initiatives. By investing in these key areas, the initiative aims to create safer, more inclusive, and resilient communities for manufactured housing residents across the Piedmont Triad region.

The implementation strategy includes rigorous site selection processes, collaborative partnerships, capacity building efforts, and continuous evaluation and monitoring. These strategies ensure that the initiative's objectives are selected equitably and implemented, and outcomes are measured to track progress.

Site Inventory Analysis Selection: Conduct inventory and analysis of existing manufactured home communities (MHCs) to compile conditions of roads, common playground equipment, lighting and security. Activities include the development of an inventory form standardized so that each park element can be indexed into the inventory. One MHC in each county of the Piedmont Triad will be selected based on housing needs, infrastructure deficiencies, and resident engagement opportunities.

Community Visioning and Charrettes: Design and conduct 12 community workshops with MHC residents to identify improvements to MHCs that are interested in community planning and qualify for quality-of-life improvement funding.

Collaborative Partnerships: Collaboration with local government agencies, nonprofits, MHC residents, property owners, and stakeholders will leverage resources and support for infrastructure improvements, community visioning and enhancements, and accessibility modifications.

Project Bidding, Management, and Implementation: The program will fund and complete the final improvements and enhancements chosen by each community. Selection of local/regional contractors to complete selected improvements and implement project implementation. RFQ selection process with designers, architects and others who can implement the projects effectively and efficiently and are pre-qualified.

Evaluation and Monitoring: Continuous monitoring will assess the effectiveness of infrastructure improvements, community enhancements, resident empowerment initiatives, and accessibility modifications in enhancing quality of life and housing stability.

MHCs in the Piedmont Triad Region

The Piedmont Triad region is located in the heart of North Carolina and is comprised of twelve (12) counties: Alamance, Caswell, Davidson, Davie, Forsyth, Guilford, Montgomery, Randolph, Rockingham, Stokes, Surry, and Yadkin County. According to the 2022 American Community Survey 5-Year Estimates, the Piedmont Triad region has an estimated total population of 1.75 million. Out of nearly 700,000 occupied housing units in the Piedmont Triad region, 9.3% are considered “Mobile Home or Other Type of Housing”. According to the Homeland Infrastructure Foundation Level Data (HILFD) database, there are 451 manufactured home communities in the Piedmont Triad Region, with 386 categorized as small (less than 50 units), 51 medium (51-100 units), and 14 large (over 100 units).

Expected Outcomes:

- Improved infrastructure, safety standards, community aesthetics, and accessibility in twelve MHCs within the Piedmont Triad region.
- Increased resident participation and engagement in community decision-making.
- Enhanced aging-in-place opportunities for older adults and people with disabilities.
- Strengthened partnerships to support long-term housing stability and resilience.

Through these efforts, the Piedmont Triad Manufactured Housing Community Empowerment and Enhancement Initiative seeks to create lasting positive impacts on the lives of manufactured housing residents, promote community resilience and pride, and foster equitable and sustainable housing solutions in the region.

Proposed Budget Summary:

Activity	Description	Estimated Cost
Planning & Community Engagement	Inventory MHCs and assets, market program opportunity and hold 12 planning charettes	\$460,000
Administration	Provide environmental review, compliance management and fiscal reporting	\$500,000
Construction - Resilient Infrastructure	Design and construction activities to improve MHCs infrastructure	\$1,680,000
Construction - Safety and Efficiency	Improve homes through weatherization, ramps or other cost saving features	\$2,160,000
Construction - Livable Community	Design and construction activities for common areas of MHCs to improve recreation options and health	\$1,200,000
<u>Total</u>		<u>\$6,000,000</u>

This budget allocation ensures that each of the 12 communities receives funding for essential infrastructure improvements, accessibility modifications, aging-in-place initiatives, and community empowerment programs. Additionally, administrative and planning costs are accounted for to support effective project management, grant administration, and evaluation activities.

**Exhibit B Threshold
Requirements and
Other Submission
Requirements**

**Piedmont Triad
Regional Council**

Resolution of Civil Rights Matters

The Piedmont Triad Regional Council does not have any outstanding civil rights matters.

Timely Submission of Applications

This application will be submitted before the submission deadline of July 10, 2024.

Eligible Applicant

The Piedmont Triad Regional Council is an eligible applicant applying under the **25 (Others)** Category.

Address: 1398 Carrollton Crossing Drive, Kernersville, NC 27284

UEI: HU2ZEBDLLT99

The Piedmont Triad Regional Council is a regional council of governments authorized by North Carolina General Statute (NCGA) 160A, Article 20, Part 2 and is a public entity and has powers to “accept, receive and dispense funds and grants” and to “contract with the State of North Carolina, any other state, the United States of America, or any agency thereof, for services” under NCGS 160A-475.

Number of Applications

The Piedmont Triad Regional Council will be submitting only one application for the Housing and Urban Development Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Competition.

Exhibit C Need

Piedmont Triad Regional Council

Factor (a) - Need

Project Area and Accessible/Affordable Housing in the PTRC Region

The Piedmont Triad region is located in the heart of North Carolina and is comprised of twelve (12) counties: Alamance, Caswell, Davidson, Davie, Forsyth, Guilford, Montgomery, Randolph, Rockingham, Stokes, Surry, and Yadkin County. According to the 2022 American Community Survey 5-Year Estimates, the Piedmont Triad region has an estimated total population of 1.75 million. Out of nearly 700,000 occupied housing units in the Piedmont Triad region, 9.3% are considered “Mobile Home or Other Type of Housing”. According to the Homeland Infrastructure Foundation Level Data (HILFD) database, there are 451 manufactured home communities (MHCs) in the Piedmont Triad Region, with 386 categorized as small (less than 50 units), 51 medium (51-100 units), and 14 large (over 100 units).

The Piedmont Triad, comprising cities such as Greensboro, Winston-Salem, and High Point, is experiencing a growing demand for affordable housing. The region's population growth, combined with economic disparities, has led to increased pressure on the housing market. Many residents, particularly those with low to moderate incomes, struggle to find housing that is both affordable and meets their needs. The rising cost of living and stagnant wage growth have exacerbated this issue, leaving a significant portion of the population burdened by housing costs.

One of the primary drivers of the need for affordable housing in the Piedmont Triad is also the economic profile of the region. Many residents work in low-wage industries such as retail, hospitality, and service sectors, which do not provide sufficient income to afford market-rate housing. According to recent data, a significant percentage of households in the region are cost-burdened, spending more than 30% of their income on housing. This financial strain limits their ability to afford other essentials such as healthcare, education, and transportation, leading to broader socioeconomic challenges within our member communities in the Piedmont Triad.

Additionally, the Piedmont Triad region has a substantial population of elderly and disabled individuals who require accessible housing. As the population ages, the demand for housing that accommodates physical limitations and mobility issues is increasing. However, the current housing stock is often not designed to meet these needs. Accessible housing units that incorporate features such as ramps, wider doorways, and modified bathrooms are in short supply, leaving many residents in unsuitable living conditions. This lack of accessible housing can force individuals into institutional care settings or unsafe living arrangements, further highlighting the need for affordable and accessible housing solutions.

The region's housing challenges are further compounded by the aging housing stock. Many affordable housing units are in disrepair and do not meet modern safety and accessibility standards. Renovating and preserving these units is crucial to maintaining the availability of affordable housing options. Additionally, the development of new affordable housing projects needs to incorporate universal design principles to ensure accessibility for all residents.

Communities meeting Distress Criteria

We have verified that each of the 12 counties in our region include Manufactured Housing Communities in census tracts that meet distress criteria as outlined in 12 CFR 1805.201(b)(3)(ii)(D). Census tracts with rates of poverty over 20% are common within PTRC's region, especially in Forsyth, Guilford, Alamance, Caswell, and Montgomery counties. With the exception of Davie County, each PTRC county has one or more census tracts in which the poverty rate exceeds 20%. Each of the counties, including Davie, also have one or more census tracts in which the median household income (MHI) is lower than the thresholds established in 12 CFR 1805.201(b)(3)(ii)(D). We have also observed a trend in which the manufactured home communities (MHC) within our region typically fall within the census tracts that meet these criteria. For instance, on average, Davie county's MHI is \$69,105 which is more than 80% of the national MHI. However, within the county, the wealth is concentrated in the eastern area, while central and western census tracts have MFIs as low as \$30,540. Each of the six MHCs in Davie County are located in census tracts where the MHI is well below the threshold established in 12 CFR 1805.201(b)(3)(ii)(D). This pattern also holds true for both rural and urban counties throughout PTRC's region.

Increasing Resiliency in Disaster-Prone Areas

While PTRC's region does not include Community Disaster Resilience Zones, as defined by FEMA, many of the MHCs in the Piedmont Triad do face serious environmental hazards, as outlined in Exhibit D Subfactor (b)(iii). Our proposal includes interventions that increase resilience both at the family home level and at the community level. For instance, 138 of the MCHs in the Piedmont Triad sit in flood zones. As flooding can be particularly devastating for manufactured homes and the infrastructure of MHCs, our interventions will build resilience by upgrading water, septic, and stormwater systems, and by enhancing roadways for proper drainage. Exhibit D Subfactor (b)(iii) also describes in detail how our interventions seek to build resilience against other common regional hazards, including storm and wind events, wildfires, and excessive heat.

Barriers to Manufactured Housing Preservation or Revitalization

In the Piedmont Triad region, several barriers exist to the preservation and revitalization of manufactured housing. These challenges span economic, regulatory, social, and environmental factors. Understanding and acknowledging these barriers is crucial for developing effective strategies to overcome them and ensure the long-term sustainability of manufactured housing communities (MHCs) in the region.

Economically, securing financing for manufactured homes and community improvements is challenging. Traditional mortgage options are often unavailable, and the loans that are available typically come with higher interest rates. Additionally, there is limited access to grants or low-interest loans for infrastructure improvements, such as water, sewer, and road repairs. The high maintenance costs associated with aging homes and infrastructure further exacerbate these financial barriers. Also, significant investment is required to ensure homes are safe and energy-efficient, which can be prohibitive for both residents and community owners.

Regulatory barriers also pose significant challenges. Local ordinances and enforcement of MHC varies widely in counties and municipalities we serve. Local zoning laws are typically more restrictive compared to single-family built communities, relegating them to less desirable areas with fewer amenities and limited access to services. The process of rezoning for community improvements or expansions can also be lengthy and complicated.

Social barriers, such as stigma and perception, could also play a crucial role in hindering revitalization and improvement efforts. Manufactured housing often carries a stigma, being perceived as substandard or temporary housing compared to stick-built, single-family housing. This negative perception can impact community morale and discourage investment. Additionally, there can be a lack of advocacy and representation for residents of manufactured housing communities, which leads to their needs being overlooked in broader housing policies. Engaging residents in revitalization efforts can also be challenging due to mistrust of local authorities or lack of awareness about available programs and resources. Diverse communities may face additional barriers, such as language differences and cultural misunderstandings, which can hinder effective communication and participation.

Environmental barriers further complicate the preservation and revitalization of manufactured housing communities. Many of these communities are located in areas prone to environmental hazards such as flooding or poor soil conditions, complicating preservation and revitalization efforts. In the Piedmont Triad region, 138 out of 553 MHCs are within flood zones. Ensuring that infrastructure improvements meet environmental standards can be costly and time-consuming. Aging infrastructure, such as outdated water, sewer, and septic systems, poses significant health and safety risks to MHCs, both on-site and surrounding areas. Addressing these issues requires substantial investment and coordination with local governments, utility providers, and environmental health departments.

Exhibit D Soundness of Approach

**Piedmont Triad
Regional Council**

Factor (b) - Soundness of Approach

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

Vision and Goals

The vision of the Piedmont Triad Manufactured Housing Community Empowerment and Enhancement Initiative is to create a vibrant, resilient and inclusive region where low to moderate income (LMI) households have access to safe, affordable, and sustainable housing. The twelve counties of the Piedmont Triad are home to an array of Manufactured Housing Communities (MHC) that face unique challenges related to urban and rural settings, demographics, rental structures, and housing and infrastructure age. Despite their differences, these communities hold many shared experiences. Through a regional approach, we will work with several distinct MHCs to identify and address their needs, while also creating opportunities for these MHCs to share best practices, thereby learning from each other. Our goals are:

Resilient Infrastructure

Upgrade water, sewer, and road systems within MHCs to provide a more resilient infrastructure that complies with applicable Unified Development Ordinances (UDOs) and eliminates potential environmental hazards and nuisances to MHC residents and surrounding communities.

- **Water System Upgrades-** update or replace existing well water systems or connecting MHCs to municipal water supplies where available. This will help to provide clean, safe, and reliable water to MHC residents.
- **Septic and Stormwater Improvements-** update or replace existing communal or individual septic systems and connect to municipal sewer systems where available. Implement stormwater control measures (SCMs). This will reduce the risk of environmental hazards and unsanitary conditions in the event of a system malfunction or extreme weather event such as flooding.
- **Road System Enhancements-** Regrade and resurface private roads within MHCs and ensure proper drainage of the roads. Many MHCs are required to provide private roads and parking for each pad. Ensuring these roads are well constructed will allow them to withstand extreme weather and drain properly to prevent flooding.
- **Compliance with UDOs-** Many of the municipalities in the Piedmont area have standards set forth for MHCs. Ensuring MHCs comply with these standards will allow these communities to remain in good standing with local officials and may help to garner a more favorable opinion towards manufactured homes as an option for LMI housing.

Safety and Efficiency

Revitalize existing manufactured homes with weatherization efforts, efficiency upgrades, and aging in place accessibility features to provide safe and efficient housing to MHC residents.

- **Weatherization-** The Piedmont Triad Regional Council has an existing weatherization department that would be deployed to help with weatherization of individual homes in MHCs to help provide resiliency to manufactured homes during extreme weather events.

- **Efficiency Upgrades-** Updating manufactured homes to more energy efficient appliances will not only reduce the cost of utility bills, but also increase the quality of life for residents and help conserve resources.
- **Accessibility-** Providing accessibility features such as wheelchair ramps promotes safe and affordable aging in place for older and disabled residents of MHCs.

Livable Community

Enhance and create community amenities and gathering spaces to provide opportunities for outdoor recreation, encourage healthy and active living, and empower MHC residents through community engagement to help create a cohesive community environment.

- **Community Amenities-** Creating and upgrading community amenities like parks, playgrounds, and greenways provides valuable outdoor recreation opportunities to MHC residents and promotes healthy, active living. These amenities also provide communal gathering spaces where residents can organize events and create a more cohesive community.
- **Community Development Workshops-** The Piedmont Triad Regional Council will conduct workshops to help identify specific needs in MHCs and assist residents in implementing solutions to those needs.
- **Landscaping and Nature Based Solutions-**

These goals meet the national objective by enhancing the quality of life of LMI persons within MHCs and aiding in the prevention and elimination of slums and blight. Upgrading infrastructure ensures residents will have access to safe drinking water, sanitary sewage and waste disposal, and an overall safe and clean community. Weatherization efforts and efficiency upgrades will help with resiliency to extreme weather conditions and help reduce utility costs for residents. Adding accessibility features will allow MHC residents to age in place and live independently. Enhancing community amenities will increase the quality-of-life residents enjoy in MHCs by providing access to recreation opportunities and high-quality communal spaces.

Eligible MHCs and Selection Criteria

Eligible recipients will be manufactured homeowners and MHCs across the 12-county region covered by the Piedmont Triad Regional Council (Alamance, Caswell, Davidson, Davie, Forsyth, Guilford, Montgomery, Randolph, Rockingham, Stokes, Surry, and Yadkin Counties) in North Carolina. Funding allocation and eligibility will be based on the specific needs of each community, considering factors such as infrastructure deficiencies, economic challenges, and housing conditions. The initiative will prioritize large MHCs with existing shortcomings in environmental justice, infrastructure, and community amenities and those who are in violation of their municipality's UDO standards. Resident owned communities will be preferred. Recipients will be found through public outreach and communication with local planning and code enforcement officials.

The following requirements are necessary for eligibility to the program:

- *Unit Requirement:* The MHC must have a minimum of 15 units or more to be an eligible community.
- *Rental Requirement:* The MHC units and/or the land it sits on must be rented for program eligibility.
- *MHC Owner Authorization:* The owner of the MHC must authorize any future improvements and enhancements described in this program.

Activities that Address Needs in Factor A

The activities planned under the PRICE Main category include:

- **Infrastructure Improvements:** Through infrastructure improvements outlined above, our initiative will help keep MHCs in good standing with their local municipalities and surrounding community to ensure they will remain in place long term to provide high quality affordable housing options to LMI households.
- **Community Amenities:** Creating and upgrading community amenities like parks, playgrounds, and greenways provides valuable outdoor recreation opportunities to MHC residents and promotes healthy, active living. These amenities also provide communal gathering spaces where residents can organize events and create a more cohesive community.
- **Resident Support Programs:** The Piedmont Triad Regional Council will conduct workshops to help identify specific needs in MHCs and assist residents in implementing solutions to those needs. These support programs could include offering financial counseling, energy audits, homeownership education, or community organizing workshops based on the need of each MHC.

Project Timeline

Following the notice of award, the following timeline will be used to guide work activities:

Activity	Description	Timeline
Contracting	<ul style="list-style-type: none"> • Complete contract documents and required policies between HUD and PTRC • Begin recruitment of required staff to assist with the initiative 	Months 0-6
Planning & Design	<ul style="list-style-type: none"> • Inventory MHCs and assets • Develop application materials and marketing plan • Market program opportunity to communities • Select and host 12 planning charrettes for interested MHCs 	Months 6-15

Site Selection & Review	<ul style="list-style-type: none"> Review planning charette outcomes and desired improvements for compliance with funding opportunity Select projects for construction and conduct any further inventory of existing assets Develop site plans as necessary with procured landscape architect and civil engineer 	Months 16-18
Environmental Review & Permitting	<ul style="list-style-type: none"> Conduct necessary environmental reviews for each project Obtain all necessary permits for construction activities Work with Technical Review Committees to finalize plans 	Months 19-24
Construction Activities	<ul style="list-style-type: none"> Procurement of construction firms Finalize designs and award bids to contractors Implement each project concurrently 	Months 25-36

Proposed Budget

Activity	Description	Estimated Cost
Planning & Community Engagement	Inventory MHCs and assets, market program opportunity and hold 12 planning charettes	\$460,000
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Construction - Resilient Infrastructure	Design and construction activities to improve MHCs infrastructure	\$1,680,000
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<u>Total</u>		<u>\$6,000,000</u>

The total requested budget is \$6,000,000 for the project from PRICE Main. Additional funding may be leveraged through other funding sources to complete projects as a result of the planning efforts as necessary or that may not fit within the criteria of the program guidelines.

Project Impact of Proposed Activities

- Resilient Infrastructure:** Upgrading and replacing critical infrastructure to modern standards would offer increased resiliency to MHCs. This would provide reliable

electricity, safe drinking water, and a sanitary sewer system to residents and decrease the likelihood of outages and environmental hazards. Upgrading stormwater control measures and road systems will provide safe ingress and egress within the community and allow emergency services to reliably reach residents.

- **Safety and Efficiency:** Weatherization efforts and efficiency audits will not only keep residents more comfortable day to day and decrease utility costs but will also help to keep residents safe in the event of extreme weather conditions where MHC residents are particularly vulnerable. Proper weatherization also reduces the likelihood of storm damage, which can prevent displacement of residents, unsafe living conditions, and costly repairs from wind and water damage.
- **Livable Community:** Enhancing MHCs with new and upgraded amenities gives MHC residents opportunities for outdoor recreation opportunities and community building activities that may not have previously been available and offers a sense of pride to the community.

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

Ensuring affordability and equity in manufactured home communities is essential for fostering inclusive and sustainable housing solutions. This involves two critical aspects: maintaining affordability for households earning below 80% of the Area Median Family Income (AMFI) and promoting equitable access to funding and resources, irrespective of location, resident population, or demographics. Additionally, addressing well water safety, modern septic systems, and providing educational common areas are integral to enhancing the overall quality of life within these communities.

Prioritizing affordability and equity in manufactured home communities is essential for creating inclusive and thriving neighborhoods. The rent for participants in the program will be limited to the “High Home Rent Limit” in the MSA as determined by the HOME Program 24 CFR 92.252(a) and will be incorporated into the PRCE Action Plan if awarded. By maintaining housing affordability, ensuring equitable access to funding and resources, addressing water and sanitation needs, and providing educational common areas, the PTRC can promote the well-being and resilience of manufactured home residents. Through collaborative efforts and community-driven initiatives, we can build a more equitable and sustainable household economy by lowering utility costs in the long term.

Affordability for Low-Income Households

Manufactured homes often serve as a primary housing option for low-income households, offering affordable alternatives to traditional housing. To preserve affordability:

- **Affordable Housing Initiatives:** Implement policies and programs that ensure manufactured home prices and rents remain within reach for households earning below 80% of the AMFI.
- **Subsidy Programs:** Offer subsidies or rental assistance to eligible residents to offset housing costs and prevent displacement due to rising expenses.

- **Regulatory Safeguards:** Enforce regulations to prevent predatory practices, such as unjustified rent hikes or exploitation of vulnerable residents, ensuring fair and stable housing costs.

Equitable Distribution of Funding

Equitable distribution of funding is crucial for addressing disparities and ensuring that all manufactured home communities receive adequate support. This includes:

- **Needs-Based Allocation:** Allocate funding based on the specific needs of each community, considering factors such as infrastructure deficiencies, economic challenges, and housing conditions.
- **Geographic Equity:** Distribute resources across diverse geographic areas, including rural, suburban, and urban settings, to address the unique challenges faced by each community.
- **Demographic Fairness:** Ensure funding is distributed equitably among communities with diverse resident populations, taking into account factors such as income level, race, ethnicity, and age.

Well Water Safety and Modern Septic Systems

Ensuring access to clean and safe drinking water, as well as modern sanitation facilities, is essential for the health and well-being of manufactured home residents. This involves:

- **Water Quality Testing:** Conduct testing of well water to ensure it meets safety standards and provide resources for remediation if contamination is detected.
- **Septic System Upgrades:** Promote the installation of modern septic systems to improve sanitation and environmental sustainability within manufactured home communities (MHC).

Educational Common Areas

Educational common areas play a vital role in promoting community engagement, social cohesion, and lifelong learning. These areas can include:

- **Community Spaces:** Establish multipurpose spaces where residents can access educational resources, attend workshops, and participate in community events.
- **Green Spaces:** Develop parks, gardens, or recreational areas that serve as educational hubs for environmental conservation, gardening, and outdoor activities.
- **Learning Opportunities:** Offer educational programs on topics such as financial literacy, health and wellness, vocational training, and environmental stewardship to empower residents and enhance their quality of life.

When following procurement of services and construction activities during the grant period of performance, appropriate signage and recruitment for labor and contracting will be encouraged to further Section 3 of the Housing and Urban Development Act of 1968 and its implementing regulations at 24 CFR part 75.

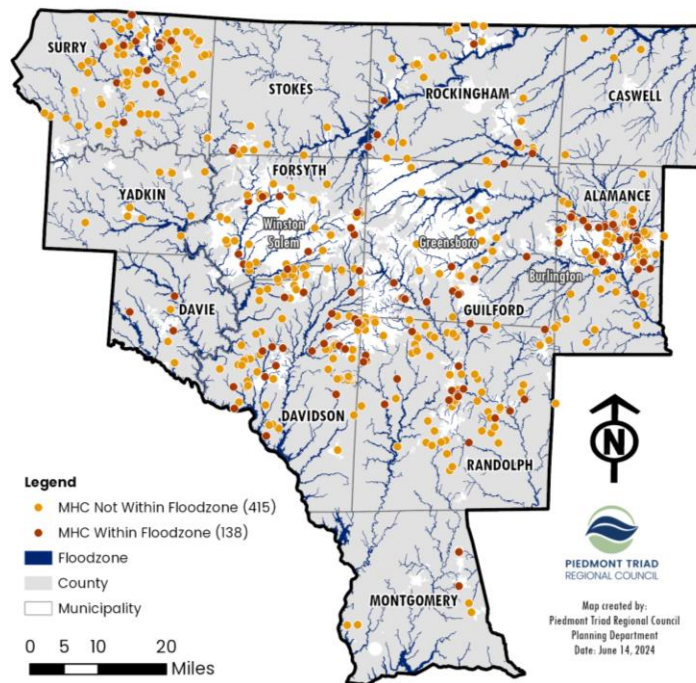
Subfactor (b)(iii): Environment and Resilience

Significant Hazard in Project Area

The MHCs within the Piedmont Triad Regional Council's jurisdiction face a variety of hazards based on their locations within urban, suburban, and rural communities. The most common and severe hazards include (1) riverine and urban flooding, (2) storm and wind events, (3) wildfires and (4) excessive heat. These hazards pose an increased threat to MHCs with ageing homes and infrastructure, which are often ill-equipped to protect residents and their property.

Of the 553 MHCs in the Piedmont Triad, 138 are prone to either riverine or urban flooding. In addition to damaging homes and community spaces via water inundation, riverine flooding can compromise the stability of manufactured homes. An influx of water can damage the structural support upholding the manufactured houses and saturate soils on which the footings rest, causing them to become unstable. Within metropolitan areas, especially Guilford and Forsyth counties, high rates of impermeable surfaces can increase the magnitude and frequency of floods, also resulting in overwhelmed storm water and sanitary sewer systems. This is particularly problematic in MHCs with aging water and sewer infrastructure.

Piedmont Triad Manufactured Housing Communities (MHCs)



Severe Storms are also uniformly common within the Piedmont Triad. In the Southeastern United States, the heat, humidity, and atmospheric conditions, especially in summer months, foster regular severe storms, which can include heavy wind and rain, lightning, hailstorms, and tornadoes. Each of these storm conditions poses a unique threat to those living in manufactured homes. Homes with ageing roofs are prone to leaking, which can result in interior water damage. Lightning, hailstorms, and severe winds can damage manufactured homes, which are often less structurally sound than site-built homes. In the case of tornadoes, NOAA and FEMA actually

advise residents of manufactured home and manufactured homes to evacuate in favor of sturdier shelters. This is informed by the fact that during tornadoes, those in manufactured homes are 15 to 20 times more likely to be killed than those in site-built homes.

Within the Piedmont Triad, wildfires are most common in Surry and Montgomery Counties, which are low-density counties with dense vegetation. Montgomery county, for instance, has a population of only 25,000, but contains the majority of the Uwharrie National Forest. Studies have found that wildfires risk increases with low-density developments along the wildland-urban interface. Therefore, smaller MHCs near densely vegetated areas are at high risk for wildfires. Both Surry and Montgomery Counties are home to dozens of smaller MHCs, typically with fewer than 50 units each.

In addition to the loss of life and property resulting from wildfires, residents also suffer from the effects of smoke inhalation. Wildfire smoke includes gaseous pollutants and particulate matter that are incredibly toxic and contribute to respiratory and cardiovascular illnesses. Wildfire smoke can also travel several miles from the source, impacting the health of residents in far away counties and cities. Therefore, wildfires have the potential to damage the health of residents throughout the Piedmont Triad. This is particularly dangerous to residents in older manufactured homes, which are often poorly insulated, and therefore porous to pollutants. In MHCs, wildfire smoke can therefore negatively impact both outdoor and indoor air quality, so that residents have no respite from the dangerous pollutants.

Finally, excessive heat is common throughout the region, with higher frequency in Guilford, Forsyth, Yadkin, Alamance, Davie, Davidson, Randolph, Chatham, and Montgomery counties. While the Piedmont Triad has historically experienced extreme heat during summer months, the frequency and severity of these events will likely increase due to both global temperature changes and increased urbanization. With less vegetation and more buildings and paved surfaces, urban areas experience higher temperatures, which is referred to as the "urban heat island effect." The highest rates of urban dwellers in the Piedmont Triad are in Forsyth (84.2%), Guilford (82.8%) and Alamance (65.8%) counties. However, as the Piedmont Triad continues to grow, rates of urbanization will likely increase throughout the region.

Excessive heat is primarily a concern because of the devastating effects it can have on human health. In addition to ranking as the natural hazard that results in the most fatalities nationally, excessive heat can contribute to a variety of illnesses. Those living in manufactured homes are more exposed to excessive heat because the homes are often poorly insulated. Additionally, low-income residents may not have air conditioning units, or they may not be able to consistently afford the costs of cooling. The University of North Carolina's Gillings School of Global Public Health released a study linking excessively hot nights with life-altering health impacts. When high home temperatures linger into the night, they can disrupt sleep patterns, leading to compromised immune systems, damaged mental health, and increased risks of conditions such as inflammation and cardiovascular disease.

Future Hazard Threats

The future will always bring uncertainty, including extreme weather and disaster events such as ice storms, heat waves, and heavy rain. Nothing in this effort will reduce the frequency of these events. However, the investments are designed to create a more resilient infrastructure, provide livable community upgrades and improve safety and efficiency. Investment in new infrastructure will bring up current standards any recreation, water or wastewater systems, which will be designed to be more resilient to flooding. Individual home improvements will focus on safety with ramps and accessibility improvements and efficiency improvements, making individuals less prone to extreme weather events.

Environmental Justice

The PRICE grant makes it easy to advance Environmental Justice by its very design. In environmental justice work, it is key to address both past inequities and to prevent future suffering from environmental hazards. Investing in MHCs in the Piedmont Triad is critical to creating safer and healthier living spaces wherein low to moderate income households can benefit from positive, sustainable relationships with their local environments. Our proposal builds on the environmental justice focus inherent in the PRICE grant through each of the three categories of intervention, which are (1) resilient infrastructure, (2) safety and efficiency, and (3) livable community.

The resilient infrastructure components in our proposal address many of the ways in which water justice impacts MHC households. In 2019, Clean Water for North Carolina (CWFNC) released a publication entitled, "Working Towards Water Justice in North Carolina Mobile Home Parks." Incorporating both a literature review and interviews with manufactured home dwellers around the state, this study found that residents of manufactured homes suffer from water-related injustices due to both water quality issues and high costs of water services. Though water quality is an important component of public health, MHCs often have compromised water quality due to reliance on contaminated sources and poorly maintained infrastructure. CWFNC spoke with many residents who did not drink the tap water because of their anxieties and experiences with the health risks associated with the water. This resulted in an over-reliance on bottled water, the quality of which is also poorly regulated. Paying for bottled water is one of many ways in which poor water quality and infrastructure adds undue costs to those living in MHCs. Residents also incur losses due to higher water bills resulting from leaks, bill hikes to compensate for infrastructure repairs, and complicated utility billing structures of MHCs.

By investing in resilient water, septic, and stormwater infrastructure, our interventions will serve to improve water quality without incurring costs to residents, while also decreasing the utility and maintenance costs of water services in MHCs. This will include testing and enhancing well water systems to protect MHC residents who are connected to wells rather than regulated by public water systems. Additionally, our proposed road system improvements will ensure safe evacuation routes in the event of extreme weather, while also improving draining, thereby reducing flood risk.

The second category of intervention, safety and efficiency, focuses on improvements to individual units, which will advance environmental justice both by reducing the cost burden of extreme weather and by protecting residents from the in-home impacts of environmental hazards. For instance, providing accessibility features such as wheelchair ramps will promote safe and affordable aging in place for elderly and disabled residents of MHCs. Our weatherization program will improve indoor air quality and temperature, while also enhancing the efficiency and affordability of climate control. By creating less permeable barriers between the outside environment and the indoor space, weatherization will make manufactured homes more effective spaces for respite from excessive heat and air pollution caused by industrial factors or wildfires. Additionally, the decreased utility cost to heat and cool the homes will allow residents to more reliably afford climate control. Through this and the other efficiency upgrades in our program, residents can expect lower monthly bills, the savings from which they can apply to address other needs such as food, education, and recreation.

Investments in the final category, living community, advance environmental justice by creating safe, accessible community spaces, such as parks, playgrounds and greenways within the MHCs. Environmental justice frameworks recognize that historically marginalized communities lack access to green spaces, which can be detrimental to physical and mental health. By creating parks, playgrounds, and greenways directly in the vicinity of manufactured homes, we are facilitating spaces that promote healthy and active living, giving residents opportunities to gather communally and engage with their natural environment. These spaces can also serve the dual-function of nature-based solutions (NBS), providing hazard mitigation by adding permeable surfaces, thereby improving draining, and by providing passive cooling through trees and other plants.

In addition to physical improvements, PTRC will address environmental justice through community development workshops. Through these workshops we will work directly with MHC residents to identify the specific needs of their communities. People are the experts on their own needs, so we will use these workshops to learn from residents about how they experience hazards, and how our services can address environmental injustices.

Subfactor (b) (iv): Community Engagement

Community engagement and public participation are core principles of the Piedmont Triad Manufactured Home Empowerment and Enhancement Initiative. This initiative is designed to empower manufactured home residents to envision enhancements in their community that promote a livable and resilient environment. The Piedmont Triad Regional Council (PTRC) is committed to fostering inclusive and diverse stakeholder participation in our efforts to support communities through the proposed PRICE Main project. Our approach is rooted in actively engaging and utilizing input from a wide array of stakeholders, including manufactured housing residents, property owners, local governments, and builders/general contractors.

To ensure inclusive stakeholder involvement, we will organize community input meetings and design charrettes to gather feedback directly from residents of manufactured housing communities (MHCs). These meetings will inform our project planning and implementation

processes, ensuring that resident needs and preferences are at the forefront of our initiative. Collaboration with local government entities and elected officials is crucial to align our activities with broader community development goals and policies, ensuring that our projects meet and support the local comprehensive and long-range plans for communities in our region. PTRC also plans on involving builders and contractors in the early stages of project planning to incorporate practical insights into design and construction and ensure that the proposed community projects are viable, durable, and sustainable.

To effectively engage underserved communities, we will employ multiple communication channels, including newsletters, social media, and website updates. PTRC will also work directly with MHC communities to determine the best way to reach and inform the residents of proposed changes in their community. Designated community liaisons will also be appointed to build trust and facilitate communication between the PTRC and the residents in the selected communities. These liaisons will help identify community leaders who can advocate for and represent their communities. Information will be provided in multiple languages to accommodate non-English speaking populations, as requested. Additionally, we will organize workshops and training sessions to educate residents about the benefits of the proposed activities and how they can participate in the process and benefit from these initiatives. These sessions will also address any misconceptions or fears about the projects.

Addressing potential barriers to participation, such as lack of awareness, mistrust of authorities, language barriers, and limited access to technology will be a focus in our approach. We will conduct a comprehensive needs assessment to identify specific barriers in each community. To mitigate these barriers, we will launch targeted awareness campaigns to inform residents about the project's goals, benefits, and opportunities for involvement. Engaging community leaders and trusted organizations to act as intermediaries will help build trust and encourage participation. We will provide translation services and ensure that all materials are accessible to people with limited English proficiency and/or disabilities.

Regular feedback mechanisms, such as community advisory boards, on-site suggestion boxes, and online surveys will be established to capture ongoing input from residents and stakeholders. We will ensure that public engagement and input are visibly reflected in decision-making processes by publicizing meeting minutes, decision rationales, and how feedback has been incorporated into project plans. PTRC's comprehensive community engagement strategy aims to ensure that our proposed activities under the PRICE Main projects are inclusive, participatory, and reflective of the diverse needs and aspirations of our targeted communities. By addressing barriers to participation and actively seeking input from a broad spectrum of stakeholders, we are committed to fostering a collaborative and supportive environment that will enhance the long-term success and sustainability of our projects.

Exhibit E Capacity

Piedmont Triad Regional Council

Factor (c) - Capacity

Since its inception in 1968, the Piedmont Triad Regional Council (PTRC) has served as a vital voluntary association of local governments, bridging both urban and rural areas to foster regional cooperation and development. Authorized by state law, PTRC has effectively utilized its capacity to make and implement joint regional decisions, ensuring cohesive and strategic progress across its member communities.

Making and Implementing Joint Regional Decisions

PTRC has been at the forefront of collaborative governance, making and implementing decisions that address the collective needs of the region. This capacity has enabled the council to tackle issues that surpass individual municipal boundaries, fostering unity and coordinated action.

Providing Management, Planning, and Technical Services

PTRC offers management, planning, and technical services to local governments. This support includes comprehensive strategic planning, project management, and technical assistance, ensuring that municipalities have access to the resources and expertise necessary for effective governance and development.

Identifying and Solving Regional Problems

The council excels in identifying and addressing both short- and long-term challenges that are best managed at the regional level. By leveraging collective strengths, PTRC provides innovative solutions to complex issues such as economic shifts, infrastructure needs, public health concerns, environmental sustainability, and social services.

Facilitating Regular Meetings Among Local Officials

PTRC plays a crucial role in facilitating regular meetings among local elected officials. These gatherings foster communication, collaboration, and the development of working relationships. By providing a platform for dialogue, PTRC ensures that officials can share best practices, align on regional priorities, and collectively navigate challenges.

Promoting Regional Issues and Cooperation

Promoting regional issues and fostering cooperation among its members are central to PTRC's mission. The council advocates for regional priorities at state and federal levels, coordinates multi-jurisdictional projects, and encourages a unified approach to common challenges, ensuring that the diverse needs of the region are effectively addressed.

Grants Management and Specialized Programs

PTRC manages a variety of specialized programs and grants, enhancing its capacity to serve the region:

- **Community Development Block Grants (CDBG):** PTRC administers CDBG funds, supporting local development projects that improve infrastructure, housing, and public services.
- **HOME Program:** The council manages the HOME Investment Partnerships Program, which helps expand the supply of affordable housing for low- and very low-income families.
- **Weatherization Assistance:** PTRC's weatherization program improves energy efficiency for low-income households, reducing energy costs and enhancing comfort.
- **Aging Services:** The council provides critical services and support for the aging population, promoting their well-being and quality of life.
- **Economic Development:** PTRC fosters economic growth by supporting local businesses, attracting new investments, and promoting workforce development.
- **Workforce Solutions:** The council addresses workforce needs through training programs, job placement services, and partnerships with local employers to ensure a skilled and ready workforce.

Expanding Regional Impact

Since its designation by the State of North Carolina in 1968, PTRC has grown to become the largest regional council in the state, serving 76 members across twelve counties: Alamance, Caswell, Davidson, Davie, Forsyth, Guilford, Montgomery, Randolph, Rockingham, Stokes, Surry, and Yadkin. This expansion reflects PTRC's success in building a cohesive and collaborative regional community.

The Piedmont Triad Regional Council has played a crucial role in regional governance and development since 1968. Through its authority to make joint decisions, provide essential services, address regional problems, facilitate collaboration, and promote cooperation, PTRC has significantly contributed to the growth and prosperity of the Piedmont Triad region. The council's effective management of grants and specialized programs further underscores its capacity to meet the diverse needs of its member communities.

Key Staff Responsible for Project Leadership, Management and Implementation

The Regional Planning and Community Development Departments will provide staff for the project. The following organizational chart shows the positions for project activities. If positions are vacated, a rehiring process would take place, while the project co-director would either re-assign those duties to an interim person or complete the tasks as needed or until such time the position is replaced. The following is a list of roles for each of the project team to ensure the program is managed properly, environmental reviews and federal rules for procurement are followed throughout the course of the proposed project

Project Co-Director(s)

Regional Planning and Community Development Director with PTRC. The co-directors are existing staff within the PTRC, Jesse Day and Michael Blair. They will be responsible for completing contracting documentation with HUD, develop the program criteria and charette

application and design process and manage the work of the program coordinators, environmental review officer and compliance manager.

Program Coordinator(s)

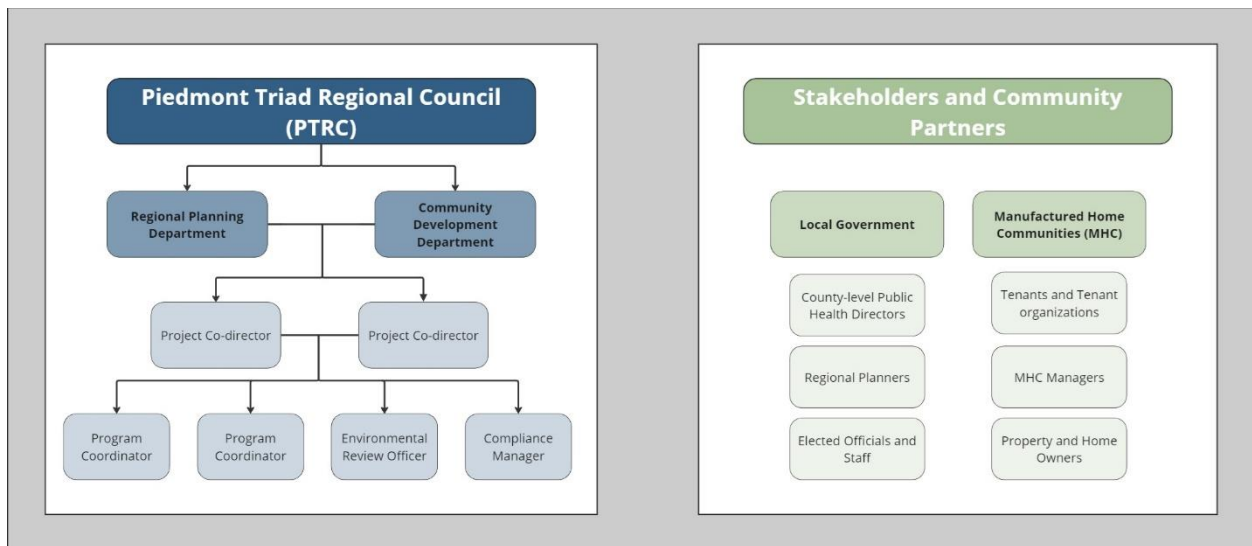
Two program coordinators will be hired to develop the application process, market the program to interested MHCs and look at partnership opportunities and locations for planning charettes. Program coordinators will also be responsible for working with selected communities to implement any deed restrictions for affordability that would be required as a result of the federal investment.

Environmental Review Officer

Environmental review officer will be retained to coordinate environmental review for any selected construction activities or other planning activities around environmental or historic resource impacts. The position in Community Development that performs environmental reviews is currently vacant, but the new hire would for HOME program, single family rehab and other activities would be responsible for environmental review for the PRICE grant project.

Compliance Manager

The compliance manager will perform construction monitoring and other construction related activities, they will also oversee procurement and Davis-Bacon wage documentation with support from the program coordinators during the grant period of performance.



Equity Focused Strategy

To ensure an inclusive and community-driven governance structure, the Piedmont Triad Regional Council (PTRC) will engage broadly with local County planning and environmental health offices to understand the environmental and socio-economic hurdles MHCs face in those

communities. There is census and other datasets describing the needs, but additional qualitative information is being assimilated from member communities.

While PTRC will lead implementation efforts, the Counties and MHCs participation will be critical to success. The application process will include key roles for individuals who live in the MHCs, understand the needs and will ensure broad participation from members of the community. Awareness and education around the benefits of the program will be delivered via different methods including presentations at nearby faith centers, community locations, clubs and through direct mail and outreach.

Experience with Environmental Reviews

PTRC has extensive experience providing environmental reviews for North Carolina agencies and federal agencies, the following list summarizes example environmental review by staff within PTRC:

- Land and Water Conservation Fund (National Parks Service),
- Community Development Block Grants – Infrastructure for sewer projects (HUD)
- HOME Program (HUD),
- Community Facilities Program (USDA),
- Parks and Recreation Trust Fund (State Parks – NC), and
- EDA (US Department of Commerce).

Existing staff in Regional Planning and Community Development as well as the Workforce and Economic Development departments have performed these reviews and are familiar with the detailed steps required in the process.

Experience with Cross-Cutting Federal Requirements

PTRC will be responsible for the federal grant's overall management, performance, oversight, and reporting responsibilities. PTRC will provide federal grant reporting, grant management and compliance with 2 CFR 200. As a regional council of government (COG) authorized by North Carolina General Statute 160A, Article 20, Part 2, the PTRC is a form of local government at the regional level that maintains policies and procedures compliant with the cost principles in 2 CFR 200, Subpart E, and the audit requirements of 2 CFR 200, Subpart F. As a political subdivision of the State of North Carolina, PTRC works closely with local governments and community partners to connect regional strategies to improve community outcomes. PTRC has worked closely with our local counties for decades and understands well the socio-economic and environmental challenges both rural and urban areas of our region faces.

Exhibit F Match or Leverage

**Piedmont Triad
Regional Council**

Although the Piedmont Triad Regional Council (PTRC) is not offering matched funding, the organization comes with over 50 years of service to the Piedmont Triad community. If our Manufactured Home Community Empowerment and Enhancement Initiative is funded, the program will be spearheaded in a joint effort between our Regional Planning and Community Development departments bringing a wide array of expertise and experience to the project.

In the event the PTRC is not awarded the full amount of funding requested for the initiative, the activities would remain relatively unchanged, but the project would need to be scaled back to serve fewer MHCs in the region. Additional funding may be leveraged through other funding sources to complete projects as a result of the planning efforts as necessary or that may not fit within the criteria of the program guidelines.

Regarding internal budget risks, the PTRC has served the region since 1968 as a voluntary association of local governments and has shown a strong track record of effectively managing and utilizing grant funding. With this amount of previous experience of dealing with grant funded projects, risks like cost overruns, failure to adhere to the budget, or unexpected expenses are unlikely.

Exhibit G Long-Term Effect

**Piedmont Triad
Regional Council**

Long-Term Effect

The Piedmont Triad Regional Council (PTRC) is committed to ensuring the long-term positive impact of our proposed activities under the PRICE Main initiative, directly addressing the needs identified in Factor (a). Our mission is to retain affordable housing opportunities for low- to moderate-income (LMI) households in our region by enhancing their communities through three main program improvement categories: Resilient Infrastructure, Safety and Efficiency, and Livable Community. These categories encompass a range of improvements, from utility and septic system repairs to shared-use facilities such as common spaces and playgrounds, and enhancements to individual units focused on weatherization, aging-in-place, and accessibility.

Our proposed activities are designed to support underserved communities over the long term by improving housing conditions for vulnerable populations. This includes implementing strategies that enable these communities to build stability and pride. By focusing on making manufactured housing or manufactured home communities (MHCs) more livable, sustainable, and resilient, we address immediate needs while laying the foundation for lasting benefits.

Resilient Infrastructure

A critical component of our initiative involves Resilient Infrastructure, which includes potential water, sewer, and septic improvements within MHCs, as well as repairs to essential infrastructure such as private drives and access improvements. Upgrading and modernizing these essential infrastructures will significantly enhance the quality of life for residents in MHCs and surrounding areas. Improved water and sewer systems will ensure reliable access to clean drinking water and efficient waste disposal, reducing health risks associated with outdated or failing systems. Enhancing septic systems will mitigate environmental contamination, improving overall community sanitation and contributing to the long-term health of the environment and water systems. These improvements not only safeguard public health but also contribute to the long-term sustainability and resilience of the communities, ensuring that residents have a safe and healthy living environment for years to come.

Safety and Efficiency

Safety and Efficiency improvements will focus on enhancing the living conditions and safety of individual units within MHCs. This includes weatherization efforts aimed at increasing energy efficiency, which can reduce utility costs for residents, making their homes more affordable to maintain. Additionally, we will implement aging-in-place modifications, such as ramps and other accessibility features, to ensure that elderly and disabled residents can live safely and independently in their homes for as long as possible. These improvements will help create secure and efficient living environments, reducing the risk of accidents and health issues associated with poor housing conditions, thus promoting long-term residential stability.

Livable Community

Livable Community improvements aim to create vibrant, engaging, and healthy community spaces within MHCs. This includes developing recreational areas, playgrounds, trails, and community gathering spaces. By investing in these shared-use facilities, we aim to foster a sense of community, encourage physical activity, and provide safe, enjoyable spaces for residents of all

ages to gather and interact. These enhancements will contribute to the overall quality of life, promoting social cohesion and community pride, and supporting the well-being of all residents. By improving these communal spaces, we address both the physical and social aspects of community life, ensuring that residents have access to areas that enhance their everyday experiences and foster stronger community bonds.

PTRC's comprehensive approach ensures that the long-term effects of our proposed activities will provide lasting benefits well beyond the term of the PRICE grant's period of performance. By focusing on sustainable and resilient community development, we will create an environment where LMI households can thrive, build wealth, and maintain their homes for generations to come. This holistic strategy not only addresses immediate infrastructure and housing needs but also promotes long-term community stability and prosperity, ensuring that our initiatives have enduring positive impacts on the communities we serve.