

**Cooperative Development Institute**

**Preservation and Reinvestment Initiative for Community Enhancement Competition  
PRICE Main Application**

**Manufactured Home Community Water Infrastructure Support Program (WISP)**

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Note: Attachments D–H to be completed after conclusion of public comment period.

### **Exhibit A—Executive Summary.**

With Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Main program funds, the Cooperative Development Institute's (CDI) Water Infrastructure Support Program (WISP) will expand its work to provide wrap-around infrastructure support for Manufactured Home Communities (MHCs) across New England and New York State. This will include infrastructure project financing paired with specialized technical assistance (TA) for 37 resident-owned MHCs, consisting of 3,860 households, alongside efforts to increase the availability of resources and build capacity of MHCs to manage and maintain their shared infrastructure.

CDI has 15 years of experience working with MHCs through its New England Resident Owned Communities (NEROC) program. NEROC helps residents of MHCs to purchase their communities from investor-owners and manage them in perpetuity as resident owned communities (ROCs) structured according to the ROCUSA Resident Ownership Model. The model has successfully ensured long-term housing affordability and stability among 320 ROCs across the country by eliminating profit-driven rent increases, adding dissolution restrictions to fully remove the property from the speculative real estate market, requiring a limited equity structure, and affirmatively marketing available housing to LMI residents. NEROC has helped MHC residents in CT, ME, ME, NY, RI, and VT raise \$268MM to form 59 ROCs serving 5,816 households since its launch. NEROC continues working with ROCs post-purchase by providing day-to-day operations, management and governance support.

In our work with ROCs, we have recognized a number of common infrastructure challenges that put the long-term affordability that they make possible at risk. Most continue to rely on the original 50-60 year old infrastructure; most are small with low-income populations and limited means to finance infrastructure projects; financing options are further constrained because the ROC property value has typically been committed as collateral for the acquisition; and, due to their size and budgets they have limited capacity to pursue the complex and ever-changing patchwork of subsidized federal and state infrastructure funding. Resources to help ROCs navigate these complex infrastructure challenges have been limited and insufficient to keep pace with demand given that the inventory of unfunded infrastructure needs self-reported by CDI's 59 ROCs is nearly \$105MM.

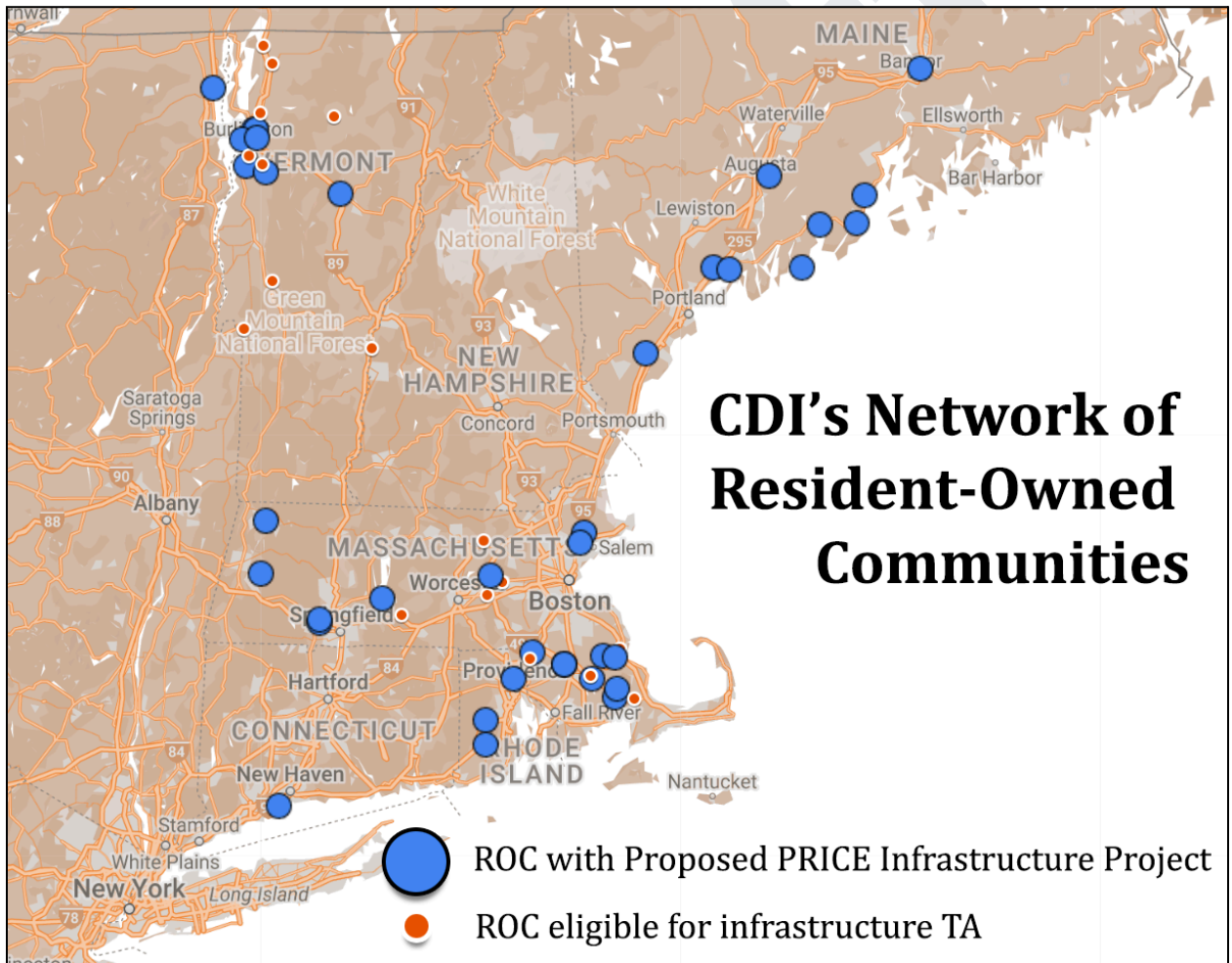
Building on its long-standing work with ROCs, CDI launched WISP in March 2023 to address these needs by developing a comprehensive and sustainable platform to provide technical assistance for ROC infrastructure projects. WISP has made significant strides over its first year: developing a roster of qualified engineers and state-by-state funding sources and permitting requirements; engaging with regulators and funders to address obstacles in permitting and funding; and initiating work with 30 ROCs to assess water and wastewater system needs, plan capital projects, and apply for funding. With a team of three core staff, WISP is currently managing \$4 million in existing ROC infrastructure projects that were in process before the program's launch and has already leveraged an additional \$10 million for new projects.

The existing sources of funding that WISP has been able to access, for both technical assistance provision and project financing, have a number of barriers that have limited the assistance we have been able to provide. PRICE Main funding would fill these gaps, resulting in a dramatic increase in resources available for the 59 ROCs in our service area, in addition to the new ROCs that will be established over the six year project period and beyond.

We request \$31,778,500 to expand WISP’s capacity to provide the ROCs in our portfolio with the financial resources and technical assistance needed to complete a range of infrastructure projects. Across the 37 ROCs to be primarily supported by this program, we will conduct:

- 15 water system projects
- 19 wastewater system projects
- 11 stormwater system projects
- 9 electrical system projects
- 3 site work projects
- 1 utility expansion project

In addition to the capital required to engage in construction projects to address the critical infrastructure needs detailed in our application, PRICE Main funds would enable CDI to increase WISP’s capacity, hiring 3 additional staff to provide dedicated technical assistance for each ROC across our service area, indicated below.



## **Exhibit B—Threshold Requirements and Other Submission Requirements.**

The Cooperative Development Institute is a 501(c)3 non-profit entity (eligible applicant type 25), without any unresolved civil rights matters, as referenced in Section III D.1.a subparagraphs (1) – (5) of the NOFO. CDI's SAM registration is up to date with all necessary registrations and certifications, and expires 3/15/25. All necessary forms, assurances, certifications and disclosures are submitted with our application and included in Attachment G.

We are submitting a single PRICE Main application and have coordinated with our regional and national partners to ensure that our application does not overlap or conflict with any other application for PRICE funds in the region. This application is being submitted in coordination with applications from the ROCUSA and Vermont Department of Housing and Community Development. To the extent that these applications are awarded funding under this NOFO, in accordance with this guidance, neither application will benefit the same Mobile Home Community.

We will coordinate environmental review for all proposed projects, as detailed on p.36. See Attachment C for discussion of Other Program-Specific Requirements: a. Fair Housing and Nondiscrimination, b. Limited English Proficiency, and c. Physical Accessibility. As our proposed activities are focused on Manufactured Housing infrastructure and not MHC units, the HOME Investment Partnerships Program (HOME) requirements at 24 CFR 92.252(a), (e), and (f) (rental housing) and 24 CFR 92.254(a)(1)-(4) (homeownership) do not apply. See Exhibit D: Affordability and Equity, p.19 and Exhibit G: Long-Term Effect, p.39 for further discussion of affordability.

### Exhibit C—Scoring Factor (a): Need

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

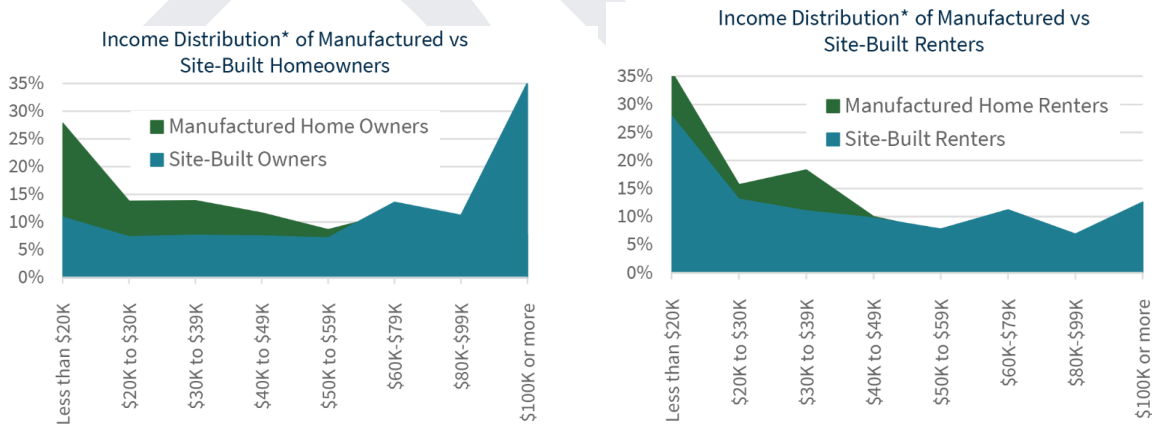
The Northeast has a severe shortage of affordable housing, and the situation has worsened since the pandemic. Home values in the region have risen 36-70% since 2019 (ref: Zillow Home Value Index), and the median-priced home is no longer affordable to the median income household.<sup>1</sup>As a result, households that are no longer able to afford to buy homes have remained in the rental market, increasing the demand for rental housing and causing rents to rise. Consequently, the share of rental homes that are available and affordable to low and moderate income households in New England and New York has declined substantially in just 5 years:

**Table 1: Regional Affordable and Available Rental Homes**

| State | Affordable and Available Rental Homes per 100 LMI Households in 2019* | Affordable and Available Rental Homes per 100 LMI Households in 2024# | % Reduction in LMI Housing Supply |
|-------|---|---|-----------------------------------|
| CT    | 102   | 94  | -8.5%                             |
| MA    | 92  | 88  | -4.6%                             |
| ME    | 106   | 97  | -9.3%                             |
| NH    | 101   | 99  | -2.0%                             |
| NY    | 84  | 83  | -1.2%                             |
| RI    | 101   | 96  | -5.2%                             |
| VT    | 95  | 91  | -4.4%                             |

(\*NLIHC The GAP 2019 #NLIHC The GAP 2024)

Manufactured housing is a crucial component of the affordable housing stock available to LMI households in New England and New York. The MHI for mobile home owners is half of the annual income of other forms of housing and the incomes of mobile home renters skews extremely-low to low income.



(Images from Fannie May report, “Manufactured Housing Landscape 2020”)

Currently, there are 287,000 mobile homes in New England and New York (Source: ACS 2022 1YR estimates S2504), and of that amount, an estimated 179,500 are in the region’s 3,924 manufactured housing communities. Private, profit-driven landowners built most of these MHCs

<sup>1</sup><https://www.barrons.com/articles/u-s-homes-were-the-least-affordable-on-record-in-2023-869405c4>

in the 1960s and 70s. Many were constructed without proper oversight and regulation, with little to no engineering and substandard materials. Many of these communities do not link to municipal systems and operate their own on-site water infrastructure. Over the decades, the private market's emphasis on profit has disincentivized capital investments in these communities. As a result, most of these MHCs continue to rely on original infrastructure, which has generally reached the end of its useful life and requires a patchwork of lower-cost "band-aid" repairs to avoid complete failure. Eventually, most MHCs will require a substantial injection of capital to thoroughly upgrade their infrastructure. Without it, an increasing number of the region's MHCs will continue to close, exacerbating the current affordable housing crisis. For example, in Vermont, there are 5.3% fewer MHC lots today than in 1989 due to park closures, nearly half of which were the result of infrastructure issues. Furthermore, according to Census data, there are 6,036 fewer mobile homes in our 7-state region compared to 12 years ago (Source: Comparison of 2022 1yr estimate and 2010 1 yr estimate from American Community Survey table S2504).

**Table 2: Regional MHCs**

| State        | # of mobile homes | # of MHCs    | # of homes in MHCs | # of CDI's ROCs | # of homes in CDI's ROCs |
|--------------|-------------------|--------------|--------------------|-----------------|--------------------------|
| CT           | 9,950             | 103          | 6,516              | 1               | 182                      |
| MA           | 51,027            | 259          | 22,166             | 29              | 3,613                    |
| ME           | 23,849            | 608          | 20,780             | 10              | 457                      |
| NH           | 28,017            | 558          | 26,118             | 0               | 0                        |
| NY           | 153,635           | 2100         | 94,248             | 1               | 54                       |
| RI           | 4,228             | 46           | 3,762              | 2               | 233                      |
| VT           | 16,254            | 238          | 7,681              | 16              | 1,277                    |
| <b>Total</b> | <b>286,960</b>    | <b>3,912</b> | <b>181,271</b>     | <b>59</b>       | <b>5,816</b>             |

Fortunately, since the 1980s, the northeast has led the nation in converting MHCs to nonprofit or resident ownership. Over 295 New England and New York MHCs comprising nearly 21,000 households are either owned by nonprofit housing providers or held directly by MHC residents as resident owned communities (ROCs). CDI has helped residents in 59 of these MHCs in CT, MA, ME, NY, RI and VT raise \$268MM to convert 5,816 households to resident ownership in a span of 14 years, the most of any entity in the country during this time period, in terms of the number of households and MHCs preserved and total funds raised. This modest investment of \$46,000 per household has led to three major quality of life improvements to MHC residents:

First, resident ownership eliminates the risk of closure by removing the MHC from the speculative real estate market. Second, ROC lot rents remain stable and only experience modest increases in line with operational expenses, rather than being raised to maximize investor profits. Finally, ROCs contribute to replacement reserves and reinvest their surplus cash flows into infrastructure upgrades at a rate far greater than for-profit MHCs. For example, Massachusetts ROCs collectively have invested nearly \$10MM in infrastructure upgrades over the past decade.

Unfortunately, the capital needs that ROCs have inherited are substantial and exceed residents' ability to replace via savings alone. In some cases they even surpass the initial cost of purchasing the community. CDI's current inventory of unfunded infrastructure needs, as self-reported by the



59 resident-owned MHCs it serves across New England, is nearly \$105 million or \$18,000 per household—39% of the total \$268 MM in funding that was raised to acquire these MHCs. Needs for each project are detailed in our list of priority projects for 37 ROCs across the Northeast:

**Table 3: CDI PRICE Main Project List**

| <b>VERMONT</b>  |                 |   |
|---|-----------------|---|
| <b>1. North Avenue Cooperative (NAC)</b>  |                 | <b>Project Priority Points: 89</b>                |
| City/Town: Burlington   | # of Homes: 119 | % LMI Households in ROC/BG <sup>2</sup> : 94%/44% |
| 2024 FMR 2 Bedroom: \$1,887   |                 | Median Home Value, County: \$484,445              |
| Lot Rent: \$426   |                 | Median Mobile Home Value, County: \$54,200        |
| Municipal water and wastewater systems have surpassed their useful lifespan and are slowly failing. New stormwater infrastructure is also needed to mitigate drainage issues. |                 |   |
| Total Project Cost: \$5,006,999   |                 | Funding Needed: \$1,100,000                       |
| <b>2. Shelburnewood Cooperative (Shelburnewood)</b>   |                 | <b>Project Priority Points: NA</b>                |
| City/Town: Shelburne  | # of Homes: 28  | % LMI Households in ROC/BG: 74%/25%               |
| 2024 FMR 2 Bedroom: \$1,887   |                 | Median Home Value, County: \$484,445              |
| Lot Rent: \$322   |                 | Median Mobile Home Value, County: \$54,200        |
| Expansion of community's utilities to add up to 28 homes to create new affordable housing. Increasing the size of this small ROC will increase its overall resiliency.        |                 |   |
| Total Project Cost: \$1,059,781   |                 | Funding Needed: \$1,000,000                       |
| <b>3. Westbury Homeowners Association (Westbury)</b>  |                 | <b>Project Priority Points: 77</b>                |
| City/Town: Colchester   | # of Homes: 250 | % LMI Households in ROC/BG: 82%/25%               |
| 2024 FMR 2 Bedroom: \$1,887   |                 | Median Home Value, County: \$484,445              |
| Lot Rent: \$509   |                 | Median Mobile Home Value, County: \$54,200        |
| Electrical infrastructure is direct burial and failing over time.   |                 |   |
| Total Project Cost: \$1,700,000   |                 | Funding Needed: \$1,200,000                       |
| <b>4. Breezy Acres Cooperative (Breezy)</b>   |                 | <b>Project Priority Points: 79</b>                |
| City/Town: Colchester   | # of Homes: 189 | % LMI Households in ROC/BG: 84%/40%               |
| 2024 FMR 2 Bedroom: \$1,887   |                 | Median Home Value, County: \$484,445              |
| Lot Rent: \$519   |                 | Median Mobile Home Value, County: \$54,200        |
| Electrical infrastructure is 60 amp, direct burial, and failing over time.  |                 |   |
| Total Project Cost: \$1,933,636   |                 | Funding Needed: \$767,742                         |
| <b>5. Hillcrest Resident Owned Community (HROC)</b>   |                 | <b>Project Priority Points: 80</b>                |
| City/Town: Colchester   | # of Homes: 44  | % LMI Households in ROC/BG: 87%/40%               |
| 2024 FMR 2 Bedroom: \$1,887   |                 | Median Home Value, County: \$394,557              |
| Lot Rent: \$519   |                 | Median Mobile Home Value, County: \$54,200        |
| Electrical infrastructure is 60 amp, direct burial, and failing over time.  |                 |   |
| Total Project Cost: \$450,625   |                 | Funding Needed: \$178,919                         |
| <b>6. Weston's Cooperative (Weston's)</b>   |                 | <b>Project Priority Points: 83</b>                |
| City/Town: Berlin   | # of Homes: 83  | % LMI Households in ROC/BG: 80%/32%               |
| 2024 FMR 2 Bedroom: \$1,453   |                 | Median Home Value, County: \$365,242              |
| Lot Rent: \$375   |                 | Median Mobile Home Value, County: \$91,700        |

<sup>2</sup> "BG" in Table 3 provides LMI data by Census Block Group based on ACS 2011-2015 estimates.

|   |                |  |
|---|----------------|--|
| The on site water distribution system has surpassed its useful lifespan and is subject to regular breaks. The water storage building and wellhead need to be elevated above base flood elevation.   |                |  |
| <b>Total Project Cost: \$1,801,262</b>  |                | <b>Funding Needed: \$476,262</b>                   |
| <b>7. Sunset Lake Cooperative (Sunset)</b>  |                | <b>Project Priority Points: 81</b>                 |
| City/Town: Hinesburg  | # of Homes: 55 | % LMI Households in ROC/BG: 77%/58%                |
| <b>2024 FMR 2 Bedroom: \$1,887</b>  |                | <b>Median Home Value, County: \$484,445</b>        |
| <b>Lot Rent: \$455</b>  |                | <b>Median Mobile Home Value, County: \$54,200</b>  |
| The onsite wastewater system has failed, and the aging water system is slowly failing.  |                |  |
| <b>Total Project Cost: \$2,538,870</b>  |                | <b>Funding Needed: \$1,170,620</b>                 |
| <b>MAINE</b>  |                |  |
| <b>8. Charter Oaks Village (Charter Oaks)</b>   |                | <b>Project Priority Points: 77</b>                 |
| City/Town: Arundel  | # of Homes: 40 | % LMI Households in ROC/BG: 84%/29%                |
| <b>2024 FMR 2 Bedroom: \$1,416</b>  |                | <b>Median Home Value, County: \$478,685</b>        |
| <b>Lot Rent: \$425</b>  |                | <b>Median Mobile Home Value, County: \$88,100</b>  |
| Onsite wastewater treatment systems are nearing the end of their useful lifespan and beginning to fail. The onsite drinking water system needs various upgrades including water storage.  |                |  |
| <b>Total Project Cost: \$895,500</b>  |                | <b>Funding Needed: \$542,000</b>                   |
| <b>9. Wardtown MHC (Wardtown)</b>   |                | <b>Project Priority Points: 76</b>                 |
| City/Town: Freeport   | # of Homes: 61 | % LMI Households in ROC/BG: 88%/54%                |
| <b>2024 FMR 2 Bedroom: \$1,946</b>  |                | <b>Median Home Value, County: \$520,767</b>        |
| <b>Lot Rent: \$315</b>  |                | <b>Median Mobile Home Value, County: \$85,000</b>  |
| Onsite wastewater treatment systems are nearing the end of their useful lifespan and beginning to fail, electrical meter panels need replacement, and the water distribution system needs a series of upgrades such as curb stops and isolation valves.                             |                |  |
| <b>Total Project Cost: \$1,042,900</b>  |                | <b>Funding Needed: \$750,000</b>                   |
| <b>10. Brunswick Bay MHC (Brunswick)</b>  |                | <b>Project Priority Points: 72</b>                 |
| City/Town: Brunswick  | # of Homes: 63 | % LMI Households in ROC/BG: 90%/55%                |
| <b>2024 FMR 2 Bedroom: \$1,946</b>  |                | <b>Median Home Value, County: \$520,767</b>        |
| <b>Lot Rent: \$365</b>  |                | <b>Median Mobile Home Value, County: \$85,000</b>  |
| Onsite wastewater treatment systems are the end of their useful life and beginning to fail. Stormwater infrastructure improvements are needed to handle increasingly heavy rains.   |                |  |
| <b>Total Project Cost: \$750,000</b>  |                | <b>Funding Needed: \$750,000</b>                   |
| <b>11. Pemaquid Villas Cooperative (Pemaquid)</b>   |                | <b>Project Priority Points: 71</b>                 |
| City/Town: Pemaquid   | # of Homes: 22 | % LMI Households in ROC/BG: 100%/39%               |
| <b>2024 FMR 2 Bedroom: \$1,062</b>  |                | <b>Median Home Value, County: \$415,491</b>        |
| <b>Lot Rent: \$345</b>  |                | <b>Median Mobile Home Value, County: \$101,700</b> |
| Trees in this small coastal community abut manufactured homes and pose a health and safety risk to residents given the increased frequency of extreme weather events. Tree roots are also causing cracks, heaves and breaks in the community's water and wastewater infrastructure. |                |  |
| <b>Total Project Cost: \$80,000</b>   |                | <b>Funding Needed: \$80,000</b>                    |
| <b>12. Medomak MHC (Medomak)</b>  |                | <b>Project Priority Points: 72</b>                 |
| City/Town: Waldoboro  | # of Homes: 44 | % LMI Households in ROC/BG: 70%/59%                |



|  |                       |  |
|--|-----------------------|--|
| <b>2024 FMR 2 Bedroom: \$1,183</b>   |                       | <b>Median Home Value, County: \$415,491</b>        |
| <b>Lot Rent: \$300</b>   |                       | <b>Median Mobile Home Value, County: \$101,700</b> |
| The water distribution system has surpassed its useful lifespan and needs to be replaced. The system is hard to repair and maintain given the location of mains under the back of each home.   |                       |  |
| <b>Total Project Cost: \$750,000</b>   |                       | <b>Funding Needed: \$750,000</b>                   |
| <b>13. Deer Ridge MHC (Deer Ridge)</b>   |                       | <b>Project Priority Points: 71</b>                 |
| <b>City/Town: Augusta</b>  | <b># of Homes: 13</b> | <b>% LMI Households in ROC/BG: 84%/33%</b>         |
| <b>2024 FMR 2 Bedroom: \$1,104</b>   |                       | <b>Median Home Value, County: \$293,520</b>        |
| <b>Lot Rent: \$260</b>   |                       | <b>Median Mobile Home Value, County: \$70,900</b>  |
| Deer Ridge's wastewater collection system is failing and needs to be replaced. All four electrical meter panels are in terrible condition and need to be replaced to ensure the safety of residents.   |                       |  |
| <b>Total Project Cost: \$170,000</b>   |                       | <b>Funding Needed: \$170,000</b>                   |
| <b>14. Sunset Terrace MHC (Sunset)</b>   |                       | <b>Project Priority Points: 79</b>                 |
| <b>City/Town: Rockland</b>   | <b># of Homes: 76</b> | <b>% LMI Households in ROC/BG: 77%/41%</b>         |
| <b>2024 FMR 2 Bedroom: \$1,120</b>   |                       | <b>Median Home Value, County: \$408,846</b>        |
| <b>Lot Rent: \$370</b>   |                       | <b>Median Mobile Home Value, County: \$127,600</b> |
| A 2" water main serving 48 homes in Sunset Terrace is well past its useful lifespan and starting to fail. Storm water is a growing problem given the slope of the community and increasingly heavy rains. Storm water is flooding home sites and compromising home foundations.                |                       |  |
| <b>Total Project Cost: \$1,200,000</b>   |                       | <b>Funding Needed: \$1,200,000</b>                 |
| <b>15. Mountainside Community Co-op (Mountainside)</b>   |                       | <b>Project Priority Points: 82</b>                 |
| <b>City/Town: Camden</b>   | <b># of Homes: 52</b> | <b>% LMI Households in ROC/BG: 57%/38%</b>         |
| <b>2024 FMR 2 Bedroom: \$1,120</b>   |                       | <b>Median Home Value, County: \$408,846</b>        |
| <b>Lot Rent: \$480</b>   |                       | <b>Median Mobile Home Value, County: \$127,600</b> |
| Mountainside's wastewater collects into a cistern at the base of the community that must be pumped and hauled to the Town's wastewater treatment plant multiple times daily. The community's water distribution system is failing and needs to be replaced.                                    |                       |  |
| <b>Total Project Cost: \$3,381,000</b>   |                       | <b>Funding Needed: \$400,000</b>                   |
| <b>16. Grey Stone MHC (Grey Stone)</b>   |                       | <b>Project Priority Points: 72</b>                 |
| <b>City/Town: Veazie</b>   | <b># of Homes: 62</b> | <b>% LMI Households in ROC/BG: 76%/40%</b>         |
| <b>2024 FMR 2 Bedroom: \$1,239</b>   |                       | <b>Median Home Value, County: \$246,177</b>        |
| <b>Lot Rent: \$340</b>   |                       | <b>Median Mobile Home Value, County: \$50,800</b>  |
| Grey Stone's wastewater collection system is experiencing significant infiltration and inflow. A recent study of the system shows that 75% of mains are in poor to bad condition with cracks, bad joints, and root intrusion. The ROC's meter panels are deteriorating and need to be replaced |                       |  |
| <b>Total Project Cost: \$750,000</b>   |                       | <b>Funding Needed: \$750,000</b>                   |
| <b>NEW YORK</b>  |                       |  |
| <b>17. New Beginnings MHA (New Beginnings)</b>   |                       | <b>Project Priority Points: 82</b>                 |
| <b>Town: Beekmantown</b>   | <b># of Homes: 54</b> | <b>% LMI Households in ROC/BG: 84%/29%</b>         |
| <b>2024 FMR 2 Bedroom: \$1,121</b>   |                       | <b>Median Home Value, County: \$198,835</b>        |
| <b>Lot Rent: \$315</b>   |                       | <b>Median Mobile Home Value, County: \$80,800</b>  |
| New Beginnings needs to install a sand filtration system to reduce the costs associated with monitoring, treating, and discharging effluent to surface waters.   |                       |  |

|  |                 |   |
|--|-----------------|---|
| <b>Total Project Cost: \$1,250,000</b>   |                 | <b>Funding Needed: \$400,000</b>                  |
| <b>MASSACHUSETTS</b>   |                 |   |
| <b>18. Wheel Estates Tenants Assoc. (Wheel Estates)</b>  |                 | <b>Project Priority Points: 86</b>                |
| City/Town: North Adams   | # of Homes: 185 | % LMI Households in ROC/BG: 94%/59%               |
| <b>2024 FMR 2 Bedroom: \$1,451</b>   |                 | <b>Median Home Value, County: \$349,620</b>       |
| <b>Lot Rent: \$450</b>   |                 | <b>Median Mobile Home Value, County: \$45,400</b> |
| Currently under a Consent Order with Mass DEP due to failing wastewater collection system. The system poses a contamination risk to residents, their drinking water, and surrounding area.   |                 |   |
| <b>Total Project Cost: \$1,200,000</b>   |                 | <b>Funding Needed: \$1,200,000</b>                |
| <b>19. Arbor Residents Association (Arbor)</b>   |                 | <b>Project Priority Points: 84</b>                |
| City/Town: Westfield   | # of Homes: 60  | % LMI Households in ROC/BG: 94%/37%               |
| <b>2024 FMR 2 Bedroom: \$1,375</b>   |                 | <b>Median Home Value, County: \$306,975</b>       |
| <b>Lot Rent: \$429</b>   |                 | <b>Median Mobile Home Value, County: \$74,800</b> |
| Water distribution system has surpassed its useful lifespan and is subject to numerous breaks and leaks. The system is built with substandard materials, including black iron and galvanized pipes. Stormwater drainage improvements are also required.  |                 |   |
| <b>Total Project Cost: \$750,000</b>   |                 | <b>Funding Needed: \$500,000</b>                  |
| <b>20. Heritage Residents Association (HRA)</b>  |                 | <b>Project Priority Points: 89</b>                |
| City/Town: Westfield   | # of Homes: 79  | % LMI Households in ROC/BG: 89%/32%               |
| <b>2024 FMR 2 Bedroom: \$1,375</b>   |                 | <b>Median Home Value, County: \$306,975</b>       |
| <b>Lot Rent: \$400</b>   |                 | <b>Median Mobile Home Value, County: \$74,800</b> |
| The water distribution system has surpassed its useful lifespan, is composed of substandard materials including galvanized pipes, and is subject to numerous leaks. A wastewater main has failed and needs to be replaced, storm water drainage improvements are also needed.  |                 |   |
| <b>Total Project Cost: \$1,450,000</b>   |                 | <b>Funding Needed: \$900,000</b>                  |
| <b>21. Quabbin Sunrise Cooperative (Quabbin)</b>   |                 | <b>Project Priority Points: 66</b>                |
| City/Town: Ware  | # of Homes: 65  | % LMI Households in ROC/BG: 86%/18%               |
| <b>2024 FMR 2 Bedroom: \$1,375</b>   |                 | <b>Median Home Value, County: \$403,319</b>       |
| <b>Lot Rent: \$388</b>   |                 | <b>Median Mobile Home Value, County: \$94,700</b> |
| Quabbin's water distribution system has surpassed its useful lifespan and is springing leaks. The on site water system is under a MA DEP Consent Order because average water usage exceeds the system's backup storage capacity. Insufficient storm water treatment is leading to standing water at some home sites. |                 |   |
| <b>Total Project Cost: \$800,000</b>   |                 | <b>Funding Needed: \$800,000</b>                  |
| <b>22. Meadowbrook HOA (Meadowbrook)</b>   |                 | <b>Project Priority Points: 61</b>                |
| City/Town: Hudson  | # of Homes: 196 | % LMI Households in ROC/BG: 94%/29%               |
| <b>2024 FMR 2 Bedroom: \$2,827</b>   |                 | <b>Median Home Value, County: \$749,255</b>       |
| <b>Lot Rent: \$600</b>   |                 | <b>Median Mobile Home Value, County: \$87,600</b> |
| Meadowbrook's water distribution and sewer collection systems are nearing the end of their useful lifespan and need to be upgraded or replaced. Engineering is needed to begin planning.   |                 |   |
| <b>Total Project Cost: \$150,000</b>   |                 | <b>Funding Needed: \$150,000</b>                  |
| <b>23. Hillcrest Mobile Home Tenants Assoc. (Hillcrest)</b>  |                 | <b>Project Priority Points: 69</b>                |

|   |  |  |
|---|--|--|
| <b>City/Town:</b> Middleborough   | <b># of Homes:</b> 95                              | <b>% LMI Households in ROC/BG:</b> 97%/32% |
| <b>2024 FMR 2 Bedroom:</b> \$1,955  | <b>Median Home Value, County:</b> \$580,255        |  |
| <b>Lot Rent:</b> \$342  | <b>Median Mobile Home Value, County:</b> \$160,200 |  |
| Hillcrest has some direct burial 60 amp services which are a fire safety hazard. Parts of the wastewater collection system are "Orangeburg" tar paper pipes and pose a contamination risk to residents and the environment.   |  |  |
| <b>Total Project Cost:</b> \$1,000,000  |  | <b>Funding Needed:</b> \$1,000,000         |
| <b>24. Royal Crest Residents Association (Royal Crest)</b>  |  | <b>Project Priority Points:</b> 76         |
| <b>City/Town:</b> W. Wareham  | <b># of Homes:</b> 154                             | <b>% LMI Households in ROC/BG:</b> 93%/37% |
| <b>2024 FMR 2 Bedroom:</b> \$2,827  | <b>Median Home Value, County:</b> \$580,255        |  |
| <b>Lot Rent:</b> \$624  | <b>Median Mobile Home Value, County:</b> \$160,200 |  |
| Royal Crest's stormwater drains into a retention pond which occasionally overflows onto surrounding properties during increasingly heavy rainfall events. Electrical infrastructure is 60 amp, direct burial, and failing over time.                                |  |  |
| <b>Total Project Cost:</b> \$600,000  |  | <b>Funding Needed:</b> \$600,000           |
| <b>25. Pine Tree Residents Association (Pine Tree)</b>  |  | <b>Project Priority Points:</b> 100        |
| <b>City/Town:</b> Carver  | <b># of Homes:</b> 191                             | <b>% LMI Households in ROC/BG:</b> 99%/61% |
| <b>2024 FMR 2 Bedroom:</b> \$2,827  | <b>Median Home Value, County:</b> \$580,255        |  |
| <b>Lot Rent:</b> \$602  | <b>Median Mobile Home Value, County:</b> \$160,200 |  |
| On site water source has declining yields and has multiple noncompliance notices from Mass Dept. of Environmental Protection due to contamination. The water distribution system is past its useful lifespan, made of substandard materials, and beginning to fail. |  |  |
| <b>Total Project Cost:</b> \$4,700,000  |  | <b>Funding Needed:</b> \$2,865,000         |
| <b>26. Conifer Green (Conifer)</b>  |  | <b>Project Priority Points:</b> 59         |
| <b>City/Town:</b> Kingston  | <b># of Homes:</b> 75                              | <b>% LMI Households in ROC/BG:</b> 96%/23% |
| <b>2024 FMR 2 Bedroom:</b> \$2,827  | <b>Median Home Value, County:</b> \$580,255        |  |
| <b>Lot Rent:</b> \$457  | <b>Median Mobile Home Value, County:</b> \$160,200 |  |
| Needs preliminary engineering to plan for the replacement of aging infrastructure.  |  |  |
| <b>Total Project Cost:</b> \$50,000   |  | <b>Funding Needed:</b> \$50,000            |
| <b>27. Halifax Mobile Home Estates Assoc. (Halifax)</b>   |  | <b>Project Priority Points:</b> 73         |
| <b>City/Town:</b> Halifax   | <b># of Homes:</b> 430                             | <b>% LMI Households in ROC/BG:</b> 93%/47% |
| <b>2024 FMR 2 Bedroom:</b> \$1,955  | <b>Median Home Value, County:</b> \$580,255        |  |
| <b>Lot Rent:</b> \$664  | <b>Median Mobile Home Value, County:</b> \$160,200 |  |
| On-site wastewater systems are past their useful lifespan and beginning to fail. A large number of trees must be removed to protect residents, their homes, and wastewater infrastructure. Electrical meter panels are in poor condition and need to be replaced.   |  |  |
| <b>Total Project Cost:</b> \$2,055,000  |  | <b>Funding Needed:</b> \$2,055,000         |
| <b>28. North Street Association (North Street)</b>  |  | <b>Project Priority Points:</b> 98         |
| <b>City/Town:</b> Danvers   | <b># of Homes:</b> 98                              | <b>% LMI Households in ROC/BG:</b> 97%/44% |
| <b>2024 FMR 2 Bedroom:</b> \$2,827  | <b>Median Home Value, County:</b> \$649,564        |  |
| <b>Lot Rent:</b> \$698  | <b>Median Mobile Home Value, County:</b> \$94,600  |  |
| Water distribution system is made of substandard materials and breaks and leaks are common. The sewer system is also in poor condition, and has several cracks.   |  |  |

|  |                 |   |
|--|-----------------|---|
| <b>Total Project Cost: \$2,507,000</b>   |                 | <b>Funding Needed: \$2,180,000</b>          |
| <b>29. Bissellville Estates (Bissellville)</b>   |                 | <b>Project Priority Points: 59</b>          |
| City/Town: Hinsdale  | # of Homes: 29  | % LMI Households in ROC/BG: 59%/30%         |
| 2024 FMR 2 Bedroom: \$1,402  |                 | Median Home Value, County: \$349,620        |
| Lot Rent: \$300  |                 | Median Mobile Home Value, County: \$45,400  |
| Five meter panels in the community are in poor condition with rotten wood supports and moderate corrosion on electrical disconnects, posing a safety issue for residents.  |                 |   |
| <b>Total Project Cost: \$164,000</b>   |                 | <b>Funding Needed: \$164,000</b>            |
| <b>30. Oak Hill Taunton Residents Assoc. (Oak Hill)</b>  |                 | <b>Project Priority Points: 69</b>          |
| City/Town: Taunton   | # of Homes: 249 | % LMI Households in ROC/BG: 86%/42%         |
| 2024 FMR 2 Bedroom: \$1,837  |                 | Median Home Value, County:                  |
| Lot Rent: \$490  |                 | Median Mobile Home Value, County:           |
| Under a Consent Order with Mass DEP due to unpermitted onsite wastewater treatment. The Order requires a connection to Taunton's system when ready. Engineering is needed to move forward and leverage additional funding. |                 |   |
| <b>Total Project Cost: \$150,000</b>   |                 | <b>Funding Needed: \$150,000</b>            |
| <b>31. Colonial Estates Homeowners Assoc. (Colonial)</b>   |                 | <b>Project Priority Points: 73</b>          |
| City/Town: Taunton   | # of Homes: 149 | % LMI Households in ROC/BG: 91%/20%         |
| 2024 FMR 2 Bedroom: \$1,837  |                 | Median Home Value, County: \$482,295        |
| Lot Rent: \$618  |                 | Median Mobile Home Value, County: \$123,000 |
| Under a Consent Order with Mass DEP due to unpermitted onsite wastewater treatment. The Order requires a connection to Taunton's system when ready. Engineering is needed to move forward and leverage additional funding. |                 |   |
| <b>Total Project Cost: \$150,000</b>   |                 | <b>Funding Needed: \$150,000</b>            |
| <b>32. Park Place Cooperative (Park Place)</b>   |                 | <b>Project Priority Points: 59</b>          |
| City/Town: Peabody   | # of Homes: 51  | % LMI Households in ROC/BG: 86%/36%         |
| 2024 FMR 2 Bedroom: \$2,827  |                 | Median Home Value, County: \$649,564        |
| Lot Rent: \$531  |                 | Median Mobile Home Value, County: \$94,600  |
| Needs preliminary engineering to plan for the replacement of aging infrastructure.   |                 |   |
| <b>Total Project Cost: \$50,000</b>  |                 | <b>Funding Needed: \$50,000</b>             |
| <b>33. Rustic Pines Residents Assoc. (Rustic Pines)</b>  |                 | <b>Project Priority Points: 53</b>          |
| City/Town: N. Attleboro  | # of Homes: 41  | % LMI Households in ROC/BG: 83%/21%         |
| 2024 FMR 2 Bedroom: \$1,693  |                 | Median Home Value, County: \$482,295        |
| Lot Rent: \$400  |                 | Median Mobile Home Value, County: \$123,000 |
| Needs preliminary engineering to plan for the replacement of aging infrastructure.   |                 |   |
| <b>Total Project Cost: \$50,000</b>  |                 | <b>Funding Needed: \$50,000</b>             |
| <b>RHODE ISLAND</b>  |                 |   |
| <b>34. Lincoln Mobile Estates Housing Co-op (Lincoln)</b>  |                 | <b>Project Priority Points: 82</b>          |
| City/Town: Lincoln   | # of Homes: 62  | % LMI Households in ROC/BG: 82%/28%         |
| 2024 FMR 2 Bedroom: \$1,693  |                 | Median Home Value, County: \$349,483        |
| Lot Rent: \$580  |                 | Median Mobile Home Value, County: \$80,300  |
| Onsite wastewater systems have surpassed their useful life. These include several cesspools  |                 |   |

|  |                        |   |
|--|------------------------|---|
| which pose a hazard to residents and the environment.  |                        |   |
| <b>Total Project Cost:</b> \$1,000,000   |                        | <b>Funding Needed:</b> \$1,000,000                |
| <b>35. Sherwood Valley Housing Corp. (Sherwood)</b>  |                        | <b>Project Priority Points: 71</b>                |
| <b>City/Town:</b> Coventry   | <b># of Homes:</b> 171 | <b>% LMI Households in ROC/BG:</b> 85%/19%        |
| <b>2024 FMR 2 Bedroom:</b> \$1,693   |                        | <b>Median Home Value, County:</b> \$381,354       |
| <b>Lot Rent:</b> \$425   |                        | <b>Median Mobile Home Value, County:</b> \$81,000 |
| Onsite wastewater systems have surpassed their useful life. These include several cesspools which pose a hazard to residents and the environment.  |                        |   |
| <b>Total Project Cost:</b> \$1,000,000   |                        | <b>Funding Needed:</b> \$1,000,000                |
| <b>36. Hillsdale Housing Cooperative Corp. (Hillsdale)</b>   |                        | <b>Project Priority Points: 66</b>                |
| <b>Town:</b> W. Kingstown  | <b># of Homes:</b> 105 | <b>% LMI Households in ROC/BG:</b> NA/21%         |
| <b>2024 FMR 2 Bedroom:</b> \$1,693   |                        | <b>Median Home Value, County:</b> \$580,289       |
| <b>Lot Rent:</b> \$300   |                        | <b>Median Mobile Home Value, County:</b> \$84,800 |
| Onsite wastewater treatment systems are nearing the end of their useful lifespan and beginning to fail. Some systems are cesspools which pose a hazard to residents and the environment.   |                        |   |
| <b>Total Project Cost:</b> \$700,000   |                        | <b>Funding Needed:</b> \$700,000                  |
| <b>CONNECTICUT</b>   |                        |   |
| <b>37. Ryder Woods Residents' Assoc. (Ryder Woods)</b>   |                        | <b>Project Priority Points: 60</b>                |
| <b>City/Town:</b> Milford  | <b># of Homes:</b> 182 | <b>% LMI Households in ROC/BG:</b> 77/34%         |
| <b>2024 FMR 2 Bedroom:</b> \$1,762   |                        | <b>Median Home Value, County:</b> \$348,664       |
| <b>Lot Rent:</b> \$410   |                        | <b>Median Mobile Home Value, County:</b> \$51,000 |
| Ryder Woods was relocated 19 years ago to make way for commercial development. The current site is experiencing erosion due to heavier rain events and the ductile iron water distribution is being compromised by a rising water table. |                        |   |
| <b>Total Project Cost:</b> \$1,300,000   |                        | <b>Funding Needed:</b> \$1,300,000                |

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

With MHI averages for mobile home owners at half of the annual income of other forms of housing, poverty rates are hyper-concentrated in MHCs. This is evidenced by the difference in the number of LMI households in the above listed ROCs, compared to their census block group. Additionally, four ROCs in our application are located within census tracts that meet the distress criteria defined in 12 CFR 1805.201(b)(3)(ii)(D).

**Table 4. Distress Criteria Projects**

| ROC name      | State | Census Tract | Qualifying Distress Criteria                              |
|---------------|-------|--------------|---|
| 19. Arbor     | MA    | 8125         | Unemployment ratio greater than 1.5X the national average |
| 21. Quabbin   | MA    | 8201.01      | Unemployment ratio greater than 1.5X the national average |
| 23. Hillcrest | MA    | 5421.02      | Median family income below 80% the metro MFI              |
| 25. Pine Tree | MA    | 5442         | Median family income below 80% the metro MFI              |

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



There are only a few census tracts in our region that are designated as Community Disaster Resilience Zones, none of which are included in our project area. See the Environment and Resilience section (p.22) for an overview of potential hazards and proposed mitigation measures.

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

Insufficient infrastructure is the key barrier to sustaining ROCs as safe, resilient and affordable housing for LMI households. We have identified the following six issues pertaining to this barrier, which our our PRICE project aims to address:

**1) Most ROCs continue to rely on their original infrastructure, which is, on average, 50-60 years old and has surpassed its useful lifespan.** The typical ROC receiving WISP services is working with deteriorating-to-failing infrastructure dating back to the 1960's and 70's. Operating infrastructure in this condition consumes most of a ROC's capacity as it is time-consuming and expensive to locate the source of problems and make band-aid fixes to old water lines and sewer systems. ROCs that have onsite water and wastewater infrastructure such as wells, septic and leach fields are particularly vulnerable given that systems like these tend to be more expensive per capita to maintain and replace. 61% of the 37 ROCS on our project list have onsite wastewater treatment and 28% have onsite water. Their useful service life is often shorter than systems tied to municipal water and sewer. As described in the example of New Beginnings, Exhibit E, p.32, infrastructure failure can result in park closure. It also poses major health and safety issues, as have been encountered by ROCs Mountainside, which must pump and truck wastewater offsite for treatment multiple times daily, and Pine Tree Village, which has contaminated drinking water.

**2) ROCs serve small, low-income populations and have limited ability to raise lot rents to finance infrastructure upgrades when needed.** The average ROC on the PRICE project list has 102 households, 86% of which are LMI households. In addition, nearly 61% of households are low income and 32% are extremely low-income. A number of ROC residents have a disability and many are elderly and live on fixed incomes (10 ROC projects in this application are over 55 communities). It is difficult to spread the cost of financing hundreds of thousands to millions of dollars of infrastructure upgrades among a small group of low-income households. Low-cost loans and grant funds are needed to avoid pushing lot rents to unaffordable levels.

**3) ROCs' infrastructure financing options are additionally constrained because most, if not all, of the ROC's property value has been pledged as collateral to acquire the property.** Although leverage goes down over time, grants and subsidized loans that can be used in conjunction with existing ROC purchase loans are needed to fill the infrastructure funding gap on many projects.

**4) Due to their small size and limited budgets, ROCs have limited capacity to navigate the complex landscape of federal and state infrastructure funding.** Not only do ROCs consume most of their capacity operating aging water infrastructure as discussed above, their small scale and limited budgets mean that their ability to hire professional support to boost their technical, managerial, and financial capacity is limited. ROC residents serve as volunteers on the board of directors governing the community—on top of their “day jobs”—and then hire third-party contractors to carry out limited operational and managerial functions (such as water and sewer operators and property managers). ROCs rarely have employees.

**5) Federal and state infrastructure funding is complex and geared towards municipalities.** Some funding sources simply don't work with the structure of the ROC. Others require municipal



sponsorship, which can often be a dead-end given that municipalities are preoccupied with their own long list of capital needs and priorities. Other sources may be a good fit, but ROCs need more capacity and resources to weave them into a feasible project. In many cases, however, ROCs lack the capacity to keep the ever-changing patchwork of programs on their radar at all. See the table below for an outline of federal funding options and barriers for ROCs.

**6) The demand for technical assistance geared towards helping ROCs improve their infrastructure far exceeds the supply, and the limited technical assistance that is available is not sufficiently tailored to ROCs.** The current network of technical assistance providers geared towards helping ROCs access infrastructure funding is small and under-resourced. Among the limited supply of consultants across the Northeast who have the expertise navigating the array of funding options available to nonprofit ROCs, most either (a) cannot serve many ROCs due to federal funding constraints (see Table 5, p.15); (b) cannot allocate more than a few hours per quarter assisting a ROC client; (c) lack familiarity with both infrastructure finance and affordable housing funding, and; (d) are not sufficiently familiar with the ROC's communication and decision-making needs to move a project forward in an efficient manner.

#### **ROC Federal Funding Options and Barriers**

As noted above, federal funding for infrastructure is not often accessible for MHCs. In some cases, ROCs are able to apply directly for the following funding sources, although there are a number of restrictions and issues, outlined below.

**USDA Rural Development:** These funds cover **water, wastewater, and stormwater projects only, not electrical or expansion projects**, and can only be used for ROCs in rural towns with populations less than 10,000, with incomes lower than the statewide non-metro MHI. The maximum grant/loan split is 75/25% based on MHI, need, and availability of funding. The loan portion is a barrier for some of our PRICE projects because it (a) jeopardizes rent affordability and (b) requires first position, which doesn't work with some of our ROCs' purchase mortgage holders. Additionally, the RD Office of General Counsel is currently determining whether ROCs can continue to qualify moving forward. The WEP statute requires RD funds go towards a "public use" and there is a question of whether the housing provided by ROCs is a public or private use. This potentially affects all RD eligible projects in the Funding Source table below.

**EPA Drinking Water SRF:** A low interest loan program that covers **drinking water projects only**. Only ROCs that have an EPA-designated "Public Water System" (PWS) are eligible. All onsite water systems with wells meet this criteria, and some municipally-connected water systems also qualify. However, many of our ROCS are considered part of their municipality's PWS and therefore don't qualify to apply to DWSRF directly. Eligibility varies depending on state policy. ROCs in MA that do have public water systems cannot apply due to the state's overly stringent private borrowing policy (see Table 5 below). While some states have principal forgiveness of 50-75% based on income level or disadvantaged nature of ROCs, the loan portion is a barrier for some of our PRICE projects because it (a) jeopardizes rent affordability and (b) requires first position, which doesn't work with some of our ROCs' purchase mortgage holders.

**EPA Clean Water SRF:** A low interest loan program that covers **wastewater and stormwater projects only**. Only VT and RI allow non-profit entities like ROCs to apply directly. Federal law limits the program to ROCs that currently have onsite wastewater treatment. Those with municipally-connected wastewater collection systems aren't eligible (the municipality must apply to CWSRF and agree to own and operate the collection system in this case, which is highly

unlikely to occur). As with DWSRF, the loan portion is a barrier for some of our PRICE projects because it (a) jeopardizes rent affordability and (b) requires first position, which doesn't work with some of our ROCs' purchase mortgage holders.

The table below shows the eligibility status of the 37 ROCs on our project list for these funding sources. The ROCs that are ineligible to apply for USDA and EPA construction funding tallied in the columns in red are also ineligible to receive many forms of USDA- and EPA-funded technical assistance. For example, WISP's TAT-MH grant from USDA-RD (discussed on p. 37) only covers WISP's infrastructure TA in 15 of the 37 ROCs on our PRICE project list.

**Table 5: Federal Funding Options**

|                        | Funding Source         |              |            |                        |              |                |                     |              |                |
|------------------------|------------------------|--------------|------------|------------------------|--------------|----------------|---------------------|--------------|----------------|
|                        | USDA Rural Development |              |            | EPA-Drinking Water SRF |              |                | EPA-Clean Water SRF |              |                |
|                        | Ineligible             |              | Eligible   | Ineligible             |              | Eligible       | Ineligible          |              | Eligible       |
| Factor                 | Town Pop.              | State policy |            | No PWS                 | State policy |                | Town ww conn.       | State policy |                |
| <b>VERMONT</b>         | 4                      |              | 3          | 2                      |              | 5              | 3                   |              | 4              |
| <b>MAINE</b>           | 2                      |              | 7          | 4                      |              | 5 (3*)         | 3                   | 6            |                |
| <b>NEW YORK</b>        |                        |              | 1          |                        |              | 1              |                     | 1            |                |
| <b>MASS.</b>           | 13                     | 3            |            | 13                     | 3            |                | 7                   | 9            |                |
| <b>RHODE ISLAND</b>    | 2                      | 1            |            | 2                      |              | 1 <sup>#</sup> |                     |              | 3 <sup>^</sup> |
| <b>CONNECTICUT</b>     | 1                      |              |            | 1                      |              |                | 1                   |              |                |
| <b>Total # of ROCs</b> | <b>22</b>              | <b>4</b>     | <b>11</b>  | <b>22</b>              | <b>3</b>     | <b>12</b>      | <b>14</b>           | <b>16</b>    | <b>7</b>       |
| <b>% Eligible</b>      |                        |              | <b>30%</b> |                        |              | <b>32%</b>     |                     |              | <b>19%</b>     |

(\* = part of match for PRICE project; # = previous project; ^=being pursued as part of project)

**Exhibit D—Scoring Factor (b): Soundness of Approach**  
**Subfactor (b)(i): Project Description, Management, and Impact**

What are your vision and goals?

CDI's vision is to support residents of MHCs across the Northeast to **purchase, manage, and upgrade** their communities so that residents can live in safe, sustainable, and affordable housing.

To realize this vision, CDI launched WISP to provide dedicated support to ROCs to upgrade their infrastructure using state and federal funding. WISP compliments CDI's long standing and successful New England Resident Owned Communities (NEROC) program, which helps residents purchase and manage their MHCs. WISP's core goals under this proposal are to:

**Goal 1: Establish WISP as one-stop-shop for ROC infrastructure technical assistance (see barrier #6).** PRICE funding, in conjunction with USDA-Rural Development funding, will allow CDI to fully build out WISP, expanding the program from 3 to 6 FTEs spread across the region to ensure all 59+ current and future ROCs in our service area have access to the specialized technical assistance they need to upgrade their aging MHC infrastructure.

**Goal 2: Enhance technical, managerial and financial capacity of all ROCs (see barrier #4)** WISP's work with its clients begins with a detailed capacity evaluation that identifies areas where the ROC needs targeted support to prepare for construction and to effectively operate and maintain the infrastructure after implementation. WISP staff will continue to develop training materials and resources to address identified capacity gaps.

**Goal 3: Provide comprehensive infrastructure resources—including funding sources—for each state (see barrier #5)** PRICE funding will allow WISP to continue its work gathering up-to-date summaries of infrastructure regulations, funding sources, engineering firms, water and sewer operators, contractors, and other consultants that can assist ROCs with their infrastructure projects in our region. This work includes identifying funding policy changes that will open up additional funding for ROC infrastructure projects (see Table 8, p.30).

**Goal 4: Improve ROC infrastructure (see barriers #1, 2 & 3)** This project will provide crucial funding to ROCs that have urgent infrastructure projects in development but are unable to complete them due to financial constraints and funding barriers. Our current project list includes \$16MM in funding leveraged from other sources. Furthermore, PRICE funding will allow WISP to add staff capacity so that we can leverage additional funding for these projects where needed as well as for other ROCs with infrastructure needs.

WISP's core goals align most directly with the following objectives in HUD's Strategic Plan:

- Objective 1A, Advance Housing Justice (see Environmental Justice, p.28)
- Objective 4A, Guide Investment in Climate Resilience (Environment and Resilience, p.22)
- Objective 4B, Strengthen Environmental Justice (Environment and Resilience, p.22)

Criteria used to select ROC infrastructure projects in this proposal are detailed in the table below. Scores are provided on Table 3, p.6.

**Table 6: Project Priority Criteria**

|   |           |
|---|-----------|
| <b>Project benefits LMI persons</b>   | Required  |
| <b>Infrastructure condition:</b> surpassed useful lifespan, out of compliance with regulations, ROC is at risk of closure if not addressed  | 35 points |
| <b>ROC infrastructure jeopardizes housing affordability:</b> current lot rent levels, infrastructure condition has or is putting upward pressure on lot rents, % of low income residents in ROC | 25 points |
| <b>Project readiness:</b> ROC capacity, engineer has been procured to work on the project, advanced project stage (e.g., final design and permitting)   | 25 points |
| <b>Project funding alternatives:</b> only funding option available is a market-rate loan  | 5 points  |
| <b>Climate vulnerability:</b> FEMA National Risk Percentile score on table 7  | 10 points |

The current landowners of proposed project sites are listed on the needs table above (starting p. 6). NAC, Breezy, and HROC, are technically owned by CDI Development Fund, an affiliate 501c3 of CDI, but each residents’ cooperative has a long-term agreement to manage their MHC.

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

The activities discussed under WISP goals 1–3 (p.16)—and barriers 4–6 described in Factor (a)—fall under eligible activity i(h) of the PRICE NOFO as they all entail providing technical assistance to ROC clients which lead to the preservation of affordable housing.

The activities discussed under WISP goal 4—and barriers 1–3 described in Factor (a)—fall primarily under the eligible activities listed in ii and iv(a) and (b) as they involve the development or improvement of infrastructure to support MHCs, improving infrastructure to enhance safety and stability in the face of weather-related hazards, and conducting other climate change mitigation activities such as installing stormwater infrastructure, respectively.

The infrastructure development activities we will undertake with PRICE funding are detailed on table 7, p.23. Nearly all of the projects on the table were recommended as the ideal solution to the need identified on table 3, p. 6, by a licensed civil engineer in the form of either a Preliminary Engineering Report (PER) or Capital Needs Assessment (CNA). Our proposed activities do not involve temporary or permanent displacement or the installation of new housing units; as a result, the project does not reserve housing for other HUD affordable housing programs.

What is your timeline and key tasks along that timeline?

CDI’s WISP program will achieve the goals outlined above through the following tasks and phases of activity over the course of the performance period:

**Table 6: Key Tasks and Timeline**

*Note: All dates below align with calendar years and not Federal fiscal years.*

| <b>Task</b>   | <b>Started</b> | <b>Completed</b> |
|---|----------------|------------------|
| <b>1. Program setup (Goals 1 &amp; 3)</b>   | 2024 Q4        | 2025 Q2          |
| At the beginning of the first year, WISP will set up systems, conduct outreach, and expand capacity to provide the proposed technical assistance. |                |                  |
| <ul style="list-style-type: none"> <li>Hire additional staff (see Exhibit E, p. 34)</li> </ul>  |                |                  |

|   |         |         |
|---|---------|---------|
| <ul style="list-style-type: none"> <li>• Hire additional contractual support (see Exhibit E, p. 35)</li> <li>• Marketing WISP TA to all 59+ eligible ROCs in CDI’s service area</li> <li>• Identify engineers and contractors to bid on projects</li> <li>• Set up grant tracking and reporting systems (e.g. DRGR)</li> </ul>  |         |         |
| <b>2. Project setup (Goals 2 &amp; 4)</b>   | 2024 Q4 | 2025 Q3 |
| Starting at the beginning of the first year, WISP will coordinate with the 37 ROCs on the project list to establish work plans and conduct preliminary technical assistance.  |         |         |
| <ul style="list-style-type: none"> <li>• General communications to 37 ROCs receiving project funding</li> <li>• Conduct income surveys as needed</li> <li>• Conduct environmental reviews for 37 ROCs</li> <li>• Conduct capacity evaluations for 37 ROCs</li> <li>• Engineering procurement as needed</li> </ul>   |         |         |
| <b>3. Project Work Plan Technical Assistance (Goal 4)</b>   | 2024 Q4 | 2030 Q4 |
| Over the course of the performance period, WISP will provide hands-on technical assistance to the 37 ROCs on the project list, following work plans established during the initial intake process (Task 2) to prepare clients to be shovel-ready with their infrastructure projects and engage in engineering and construction on the following timeline:               |         |         |
| <b>A. Preliminary engineering for MA ROCs (3)</b>   | 2025 Q3 | 2026 Q2 |
| <ul style="list-style-type: none"> <li>• General communications to ROCs</li> <li>• Coordinate information exchange between all parties</li> </ul>   |         |         |
| <b>B. Final design and permitting projects for MA ROCs (3)</b>  | 2025 Q3 | 2027 Q1 |
| <ul style="list-style-type: none"> <li>• General communications to ROCs</li> <li>• Coordinate information exchange between all parties</li> </ul>   |         |         |
| <b>C. Near shovel-ready projects (13 ROCs)</b>  | 2025 Q3 | 2028 Q4 |
| <ul style="list-style-type: none"> <li>• General communications to ROCs</li> <li>• Contractor procurement support</li> <li>• Coordinate information exchange between all parties</li> <li>• Act as Owner’s Rep, facilitate on-site logistics</li> <li>• Manage project budgets</li> <li>• Ensure NEPA, permitting, and regulatory requirements are being met</li> </ul> |         |         |
| <b>D. Engineering+construction projects (18 ROCs)</b>   | 2025 Q3 | 2030 Q4 |
| <ul style="list-style-type: none"> <li>• General communications to ROCs</li> <li>• Contractor procurement support</li> <li>• Coordinate information exchange between all parties</li> <li>• Act as Owner’s Rep, facilitate on-site logistics</li> <li>• Manage project budget</li> <li>• Ensure NEPA, permitting, and regulatory requirements are being met</li> </ul>  |         |         |
| <b>4. Ongoing Infrastructure TA for all 59+ ROCs (Goals 2-4)</b>  | 2024 Q4 | 2030 Q4 |
| Alongside dedicated infrastructure project support to the 37 PRICE infrastructure projects above, WISP staff will engage in ongoing capacity building and fundraising activities to ensure all 59+ eligible and interested ROCs in our service area have access to the resources and capital needed to begin upgrading their infrastructure.                            |         |         |

|   |
|---|
| <b>A. Technical, managerial and financial capacity support for all ROCs</b>   |
| <b>B. Fundraising support for all ROCs (as needed)</b>  |
| <b>C. Regulatory support for all ROCs</b>   |
| Each state has its own regulations and permitting requirements, which can include different departments or agencies. MHCs may need multiple permits from seemingly disconnected state or federal sources to move forward with their projects. WISP staff assist with ensuring all legal permits are in place, work directly with the relevant state or federal agency on behalf of the MHC, and communicate regulatory needs to the community |

Cascading Activities Across Portfolio

**Tasks 1-2:** We will build on systems established since the launch of WISP to coordinate program and project setup activities across all clients. As soon as funding is confirmed, we will initiate the hiring process for additional WISP staff, described in Exhibit E, which will enable us to coordinate across sites and provide the required technical assistance for each site in our PRICE portfolio.

**Task 3:** We will utilize multi-ROC procurement of engineers and other contractors, as appropriate (e.g. the same water and wastewater engineer for all clients in a state/part of state). We have successfully used this approach for the 6-ROC CDBG project in Maine discussed on p. 32 and we are using this approach for the Breezy & HROC electrical project.

**Task 4:** Multi-site coordination of these activities will be managed by WISP Program Director and the scaling up of staff capacity and established systems.

What is your budget?

CDI requests a total of \$31,778,500 in PRICE Main funds, according to the following uses: 8.71% of the award covers all CDI expenses—personnel and associated fringe benefits for technical assistance and grant management (see Exhibit E, p.34 for details on roles), as well as related travel (19,500 miles/year at 0.67/mile), supplies, and indirect costs (calculated at 10% of non-construction expenses). In addition, 1.28% of the award is allocated towards contractual support for the program as detailed on p.35. Construction costs, which reflects costs for all projects detailed in the project table on p.6-12 amount to 90.58% of the PRICE award. The project budget overview below is reflective of the submitted 424CBW. See Exhibit F, p.38, for full details on additional funds leveraged for each project, which totals over \$16MM, 50.9% of the PRICE budget. See the attached Form HUD-424CBW for full details.

| <b>CDI PRICE Main Budget Summary</b>     |                       |                         |
|--|-----------------------|-------------------------|
| <b>Analysis of Total Estimated Costs</b> | <b>Estimated Cost</b> | <b>Percent of Total</b> |
| <b>1 Personnel (Direct Labor)</b>        | <b>\$1,954,056</b>    | <b>4.1%</b>             |
| <b>2 Fringe Benefits</b>                 | <b>\$429,892</b>      | <b>0.9%</b>             |
| <b>3 Travel</b>                          | <b>\$87,390</b>       | <b>0.2%</b>             |
| <b>4 Equipment</b>                       | <b>\$0</b>            | <b>0.0%</b>             |
| <b>5 Supplies and Materials</b>          | <b>\$58,662</b>       | <b>0.1%</b>             |
| <b>6 Consultants</b>                     | <b>\$405,000</b>      | <b>0.8%</b>             |
| <b>7 Contracts and Sub-Grantees</b>      | <b>\$0</b>            | <b>0.0%</b>             |
| <b>8 Construction</b>                    | <b>\$44,587,419</b>   | <b>93.2%</b>            |



|    |                           |                       |                     |               |
|----|---------------------------|-----------------------|---------------------|---------------|
| 9  | <b>Other Direct Costs</b> |                       | <b>\$47,522,419</b> | <b>99.4%</b>  |
| 10 | <b>Indirect Costs</b>     |                       | <b>\$293,500</b>    | <b>0.6%</b>   |
|    | <b>Total:</b>             |                       | <b>\$47,815,919</b> | <b>100.0%</b> |
|    |                           | <b>Federal Share:</b> | <b>\$31,778,500</b> |               |
|    |                           | <b>Match</b>          | <b>\$16,037,419</b> | <b>50.5%</b>  |

What are the projected impacts of your activities if implemented?

See Exhibit G, p.39, Table 3, p.6, and Table 7, p.23, for details on proposed impacts on enhancements to MHCs, access to quality affordable housing, and enhanced resilience of MHCs.

**Subfactor (b)(ii):Affordability and Equity**

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

Our ROCs have already taken the single most important step necessary to preserve housing affordability and equity: They have taken ownership of their MHCs and have thereby removed the incentive to increase lot rents for profit.

Across CDI’s portfolio of ROCs, although converting to resident ownership typically results in an initial lot rent increase of 5-10% to cover the purchase price, closing costs, and starting operating and reserve balances, lot rents have subsequently increased only 1% annually. By contrast, rents in for-profit MHCs typically increase 4-6% per year and have risen at far higher rates post-pandemic.<sup>3</sup> As a result, the gap between ROC lot rents and for-profit MHC lot rents becomes considerable over time. For example, when Hillcrest was reappraised in 2022, the report showed that rents in the ROC were over \$200 lower than market lot rents in the area; consequently, the ROC’s market value of \$7.7 million was 281% higher than when residents purchased the property in 2013.

Furthermore, eliminating profit-driven rent increases by converting to resident ownership generally halts manufactured housing depreciation and can even lead to a modest increase in manufactured home values, thereby building equity for residents. Since it is more desirable to live in a community with stabilized rents and routine maintenance, and since it is safer for lenders to issue home loans with better terms for homebuyers in such an environment, home values in ROCs tend to be higher than comparable homes in for-profit MHCs. A 2006 study conducted in NH found that homes in ROCs sell more quickly and have a 12% higher price per square foot than homes in for profit MHCs.<sup>4</sup>

ROCs have a number of provisions built into their corporate documents that balance this modest growth in homeowner equity with the need to permanently preserve housing availability and affordability for LMI households: Vacant lots in ROCs must be marketed to LMI households for 30 days before an offer from a non LMI household can be considered. In addition, when a home is listed for sale in a ROC, the ROC must choose a comparable offer from an LMI buyer over a non-LMI buyer. These provisions, along with additional protections for residents discussed in the next section, have ensured that ROCs continue to provide housing to predominantly LMI households (86% of households in ROCs on average) years after converting to resident ownership. CDI tracks this by comparing resident income surveys conducted prior to the MHC purchase with income surveys conducted when ROCs refinance their purchase loans (typically

<sup>3</sup> <https://www.washingtonpost.com/business/2022/06/06/mobile-manufactured-home-rents-rising/>

<sup>4</sup> <https://scholars.unh.edu/cgi/viewcontent.cgi?article=1009&context=carsey>

every 10 years). Among the 11 ROCs that have been resurveyed, the percentage of LMI households has decreased 1%, while the percentage of low income and extremely low income households has increased 3% and 11%, respectively.

Although the ROCUSA resident ownership model has allowed our ROCs to preserve housing affordability to date, substandard infrastructure in ROCs is starting to put upward pressure on lot rents. For example, utility bills and operations and maintenance (O&M) expenses in CDI's ROCs have increased 7.7% per year on average since 2019. Many of the ROCs on our priority project list are even worse off. For instance, in Heritage Residents Association and Arbor, which both have failing municipal water systems, annual utility and infrastructure O&M expenses have increased 43% and 51% since 2019, respectively. A major aim of this proposal is to put a stop to rent increases that are driven by costly and inefficient MHC infrastructure.

One project on our proposed PRICE project list involves the creation of up to 28 new manufactured housing lots at Shelburnewood. To ensure that the new housing created here remains available to LMI households, we will propose a 30-year Affordability Covenant reserving most lots for LMI households as a condition of the project receiving PRICE funding.

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

All of the activities proposed in this application will take place in ROCs organized and structured according to the ROCUSA Resident Ownership Models. CDI is a Certified Technical Assistance Provider in the ROCUSA network and has long-term technical assistance agreements in place with every ROC client. These agreements require the following resident protections which we propose to make permanent via a recorded covenant as part of this proposal:

1. Fee simple resident ownership and control of the MHC in the form of a nonprofit or cooperative corporation eliminates profit-driven rent increases because residents have no motive to charge themselves more than the cost of operating and sustaining the MHC.
2. The ROC is permanently removed from the speculative real estate market by eliminating the incentive for residents to sell the ROC for personal gain. This is achieved by dissolution restrictions placed in the articles of incorporation which require net proceeds of the MHC sale to be transferred to a housing-related 501(c)3.
3. The ROC must have a limited-equity structure. Membership shares cannot exceed \$1,000 but are generally \$100 to ensure long-term affordability.
4. The ROC's corporate documents cannot include barriers that in any way restrict participation of low income families or protected classes. The documents must also prioritize LMI households in marketing of housing opportunities (discussed on p.37).
5. Members are granted a perpetual lease in the ROC.

In addition, each state in our region has strong protections in place that protect all MHC residents. All seven states have statutes that restrict grounds for eviction. Some states in our region include added protections: In MA, an MHC owner must offer a 5-year term to tenants and 15 municipalities have rent control; in NY, the minimum lease term is 1 year and all MHCs have rent control; in VT, leases are perpetual and there are rent increase restrictions. Further, all states in our region now have Opportunity To Purchase laws in place after ME, CT, and NY passed legislation in the last year. These statutes greatly increase the rate of MHC conversion from for-profit to resident ownership.

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

We have noted above that the ROCs on our project list have an average of 102 households, 86% of which are LMI households, 61% of which are low income and 32% that are extremely low-income. We have also described the barriers in place that have resulted in a lack of resources and financing being directed towards these communities to maintain safe and affordable housing. As outlined in our stated goals, WISP's primary focus is to increase access to resources and financing for these underserved communities through wrap-around technical, managerial and financial assistance. We provide ROCs with TA and resources that enable and prepare them to receive federal funding and to effectively manage community infrastructure. We also develop and provide resources to help residents with home repair and maintenance as it impacts the functioning of the community's overall infrastructure (e.g. addressing running toilets that can impact a ROC's water bills, or preventing frozen pipes that can lead to major park repairs).

Furthermore, our infrastructure work with ROCs opens up access to sources of long-term, low-interest financing for underserved residents. For example, in VT and NY, USDA's 502 Single Family Housing loans are available to ROC residents as part of a pilot program. The program allows underserved persons to acquire new energy star-rated manufactured homes with low interest financing spread over a 30-38 year term. To enroll in the pilot, ROCs have to provide documentation from regulators that their infrastructure is in good standing.

In addition, we regularly assist ROC residents in accessing other programs that support low income and underserved populations, either directly or in collaboration with partner organizations like Champlain Valley Office of Economic Opportunity (CVOEO) in Vermont and Coastal Enterprises Inc. (CEI) in Maine. These programs include: financial literacy classes; home repair programs, such as the USDA 504 repair program and the Manufactured Housing Improvement and Repair (MHIR) program in VT; energy efficiency programs; weatherization programs; fuel/energy assistance programs; and resources on accessibility improvements.

In accordance with Section 3 requirements, during the PRICE grant period, we will conduct outreach to achieve a target of 25% total project hours performed by LMI individuals and/or 5% "targeted Section 3" hours. Bid opportunities will be sent to contractors on HUD's Section 3 list, and contractors will post job opportunities within nearby ROCs and public housing authorities. We also try to divide projects into smaller, more manageable jobs (e.g., separately bidding utility locating, excavating, and service line installation at homesites) to encourage LMI participation.

### **Subfactor (b)(iii):Environment and Resilience**

#### What significant hazards could impact your project site(s)?

The poor condition of infrastructure in many MHCs poses a range of health and safety hazards for residents. Substandard and failing systems impact the day-to-day lives of residents, jeopardize the affordability of the community, and amplify the impacts of hazards and extreme weather events, identified in the table in the following section (p.23).

#### Drinking water system hazards

Failing distribution systems lead to water breaks that pose risks of contamination, as well as high water bills, forcing lot rents higher (e.g. NAC). Use of substandard materials (galvanized and black iron pipe) similarly pose health and safety risks for many ROCs (e.g. Arbor, Heritage). Exacerbating factors include: systems that are too close to wastewater lines; systems that are not buried deep enough, leading to breaks from frost heaves; and aging distribution lines installed under mobile homes, making them difficult to maintain and replace (e.g. Medomak).

Wells can fail in drought conditions, leaving a whole community without water. They are vulnerable to power outages, and don't often have backup power systems, and vulnerable to contamination if too close to leach fields, or emerging contaminants (e.g. Pine Tree). Many communities don't have a backup well or adequate water storage in case of emergencies.

#### Wastewater system hazards

Wastewater systems in MHCs either involve onsite treatment such as septic tanks and leach fields or are collection systems that tie into municipal systems. In both cases, the system may require power to pump wastewater upstream, and many MHCs don't have backup power.

In the case of on-site systems, septic tanks and leach fields typically only have a useful life of 20-25 years and require regular maintenance to achieve this lifespan, which can also be impacted by a range of factors, including rising water tables due to heavier rains, degradation of soil quality, and tree root intrusion. Some MHCs still have cesspools, where effluent leaches into surrounding soils without treatment (e.g. Sherwood, Lincoln, Hillsdale). Failing and substandard onsite systems pose a health hazard to residents and can contaminate the surrounding environment. Although it is always preferable to connect an MHC to municipal treatment, in many cases this is not feasible due to either the distant location of sewer connections or due to the constraints on the municipality's sewer treatment capacity.

All MHCs have wastewater collection infrastructure that channels wastewater from homesites to treatment onsite or offsite. Failing collection systems similarly pose the risk of contaminating MHC drinking water and the surrounding environment. Hazards include: groundwater and surface water entering collection systems, overtaxing wastewater treatment downstream; systems that are not buried deep enough and are vulnerable to frost heaves; old distribution lines installed under mobile homes that are difficult to maintain and replace; the use of substandard materials such as Orangeburg (a mix of hot pitch and wood pulp) that have degraded over time (e.g. Wheel Estates); lines broken by tree roots and other site conditions (e.g. Hillcrest).

#### Storm water

Storm water systems are often informal or nonexistent in MHCs. As a result, storm water flows along existing roads and through lots, causing damage and increasing maintenance costs for roads and homes (e.g. Sunset Terrace), as well as creating safety risks during and after increasingly severe weather events. Insufficient storm water infrastructure can also exacerbate an MHC's wastewater infrastructure problems and can lead to contamination of the watershed.

#### Electrical infrastructure

Aging, substandard electrical infrastructure poses a life safety hazard to MHC residents. Some MHC's still have 60 amp service with fuses, which, combined with deteriorating wiring and meter panels, can pose a serious fire risk (e.g. Breezy and HROC). Many lines have not been buried deeply enough and are direct burial (not protected in conduit), leading to breaks over time as the ground settles or vehicles drive over them (e.g. Westbury). Many MHCs have meter panels that are falling over and not sufficiently protected from the elements (e.g. Deer Ridge).

#### Other site conditions

MHCs are often sited on land that has been deemed unsuitable for "higher and better" uses. As such, they often have site conditions that pose a potential safety hazard to residents and vulnerability to extreme weather. These include: communities located in or near floodplains (e.g. Weston's); communities with slope stability issues (e.g. Ryder Woods); communities with

hazardous trees that pose a threat to residents, their homes, and infrastructure, as described above (eg. Pemaquid, Halifax), and which increase risk of fires, if not well managed.

How will your activities address the current and future threat of natural hazards, extreme weather, and disaster events?

WISP’s proposed activities will make substantial strides to reduce the impact of current and future threats for the majority LMI residents of the ROCs in our project list: natural hazards, extreme weather, and disaster events. In the table below, we have indicated the composite FEMA NRI score, moderate and high FEMA hazards, and description of how our proposed project addresses these hazards for all relevant construction projects.

**Table 7: Client Hazard Mitigation**

|  |       |  |   |
|--|-------|--|---|
| <b>1. NAC</b>  |       | <b>Project: Water, Wastewater, Stormwater</b>          |   |
| <b>FEMA NRI National Risk:</b>   | 6.37  | Moderate and <b>High</b> FEMA Hazards in census tract: | Ice storm, Landslide, Winter weather                |
| <b>How project addresses hazards:</b> NAC’s water and sewer replacement project will reduce water contamination risks and improve climate resiliency by installing infrastructure at the appropriate depth below ground. New stormwater infrastructure will ensure that residents are better protected from heavy precipitation events in all seasons. |       |  |   |
| <b>3. Westbury</b>   |       | <b>Project: Electric</b>                               |   |
| <b>FEMA NRI National Risk:</b>   | 4.8   | Moderate and <b>High</b> FEMA Hazards in census tract: | Landslide, Winter weather                           |
| <b>How project addresses hazards:</b> Westbury’s electrical replacement project will reduce the risk of fire and power outages associated with failing services.   |       |  |   |
| <b>4. Breezy Acres</b>   |       | <b>Project: Electric</b>                               |   |
| <b>FEMA NRI National Risk:</b>   | 4.8   | Moderate and <b>High</b> FEMA Hazards in census tract: | Landslide, Winter weather                           |
| <b>How project addresses hazards:</b> Breezy Acres’ electrical replacement project will reduce the risk of fire and power outages associated with failing services to ensure the health and safety of residents during extreme weather events.   |       |  |   |
| <b>5. HROC</b>   |       | <b>Project: Electric</b>                               |   |
| <b>FEMA NRI National Risk:</b>   | 4.8   | Moderate and <b>High</b> FEMA Hazards in census tract: | Landslide, Winter weather                           |
| <b>How project addresses hazards:</b> HROC’s electrical replacement project will reduce the risk of fire and power outages associated with failing services to ensure the health and safety of residents during extreme weather events.  |       |  |   |
| <b>6. Weston’s</b>   |       | <b>Project: Water</b>                                  |   |
| <b>FEMA NRI National Risk:</b>   | 50.12 | Moderate and <b>High</b> FEMA Hazards in census tract: | <b>Landslide, Riverine flooding,</b> Winter weather |
| <b>How project addresses hazards:</b> Upgrading Weston’s failing water distribution system in conjunction with elevating a water storage building with increased storage above flood level will ensure residents have reliable and safe drinking water.  |       |  |   |
| <b>7. Sunset Lake</b>  |       | <b>Project: Water, Wastewater, Stormwater</b>          |   |
| <b>FEMA NRI National Risk:</b>   | 13.36 | Moderate and <b>High</b> FEMA Hazards in census tract: | Ice storm, landslide, winter weather                |



|  |       |  |  |
|--|-------|--|--|
| <b>How project addresses hazards:</b> SLC's project, which involves replacing failing onsite wastewater infrastructure with a connection to municipal wastewater treatment, will reduce groundwater contamination threat and substantially improve climate resiliency. The project will also replace aging water infrastructure and include new stormwater infrastructure. |       |  |  |
| <b>8. Charter Oaks</b>   |       | <b>Project:</b> Water, Wastewater, Stormwater          |  |
| <b>FEMA NRI National Risk:</b>   | 35.59 | Moderate and <b>High</b> FEMA Hazards in census tract: | Hurricane, <b>Ice storm</b>  |
| <b>How project addresses hazards:</b> New on site wastewater treatment will protect the community and the environment from the risk of contamination. Adding water storage to the on site water system will improve climate resiliency. New stormwater treatment infrastructure will protect wastewater infrastructure and protect residents during heavy rain events.     |       |  |  |
| <b>9. Wardtown</b>   |       | <b>Project:</b> Water, Wastewater, Electric            |  |
| <b>FEMA NRI National Risk:</b>   | 17.6  | Moderate and <b>High</b> FEMA Hazards in census tract: | Hurricane, Ice storm   |
| <b>How project addresses hazards:</b> New on site wastewater treatment will protect the community and the environment from the risk of contamination. Water distribution system improvements will ensure residents have a reliable supply of drinking water. Replacing meter panels will ensure safe and reliable electrical service in all weather conditions.            |       |  |  |
| <b>10. Brunswick Bay</b>   |       | <b>Project:</b> Wastewater, Stormwater                 |  |
| <b>FEMA NRI National Risk:</b>   | 22.07 | Moderate and <b>High</b> FEMA Hazards in census tract: | Hurricane, Ice storm   |
| <b>How project addresses hazards:</b> New on site wastewater treatment will protect the community and the environment from the risk of contamination. New stormwater treatment infrastructure will protect wastewater infrastructure and protect residents during heavy rain events.   |       |  |  |
| <b>11. Pemaquid</b>  |       | <b>Project:</b> Site Work                              |  |
| <b>FEMA NRI National Risk:</b>   | 57.78 | Moderate and <b>High</b> FEMA Hazards in census tract: | Hurricane, <b>Ice storm</b> ,<br>Landslide                               |
| <b>How project addresses hazards:</b> Removing trees that pose a hazard to residents, their homes, and the community's water and wastewater infrastructure at Pemaquid will make the community more resilient in the face of extreme weather events.   |       |  |  |
| <b>12. Medomak</b>   |       | <b>Project:</b> Water                                  |  |
| <b>FEMA NRI National Risk:</b>   | 65.63 | Moderate and <b>High</b> FEMA Hazards in census tract: | Hurricane, <b>Ice storm</b> ,<br>Landslide, coastal flooding             |
| <b>How project addresses hazards:</b> Replacing Medomak's drinking water distribution system with a modern, properly designed and properly installed system will ensure the 44 households in this community have safe and reliable drinking water for generations to come.   |       |  |  |
| <b>13. Deer Ridge</b>  |       | <b>Project:</b> Wastewater, Electric                   |  |
| <b>FEMA NRI National Risk:</b>   | 51.93 | Moderate and <b>High</b> FEMA Hazards in census tract: | Hurricane, Ice storm,<br>Landslide, Riverine flooding,<br>Winter weather |
| <b>How project addresses hazards:</b> Replacing Deer ridge's community leach fields and its upgrading wastewater collection lines will ensure residents and the surrounding environment are protected from contamination. Electrical panel upgrades will ensure residents have a safe and reliable power source.   |       |  |  |



|  |       |  |   |
|--|-------|--|---|
| <b>14. Sunset Terrace</b>  |       |  | <b>Project:</b> Water, Stormwater                         |
| <b>FEMA NRI National Risk:</b>   | 53.15 | Moderate and <b>High</b> FEMA Hazards in census tract: | hurricane, <b>Ice storm</b> , coastal flooding            |
| <b>How project addresses hazards:</b> New properly sized water distribution infrastructure will ensure that Sunset Terrace has a reliable source of drinking water. Stormwater infrastructure will protect residents and their housing from extreme weather events.  |       |  |   |
| <b>15. Mountainside</b>  |       |  | <b>Project:</b> Water, Wastewater                         |
| <b>FEMA NRI National Risk:</b>   | 63.2  | Moderate and <b>High</b> FEMA Hazards in census tract: | hurricane, <b>Ice storm</b> , landslide, coastal flooding |
| <b>How project addresses hazards:</b> Mountainside is partnering with the Town of Camden to extend sewer mains to the MHC, connecting its collection system to municipal treatment, to ensure the residents and broader community do not suffer a catastrophic event. Replacing the community's water system will protect and preserve its limited supply of on site drinking water. |       |  |   |
| <b>16. Grey Stone</b>  |       |  | <b>Project:</b> Wastewater, Electric                      |
| <b>FEMA NRI National Risk:</b>   | 8.18  | Moderate and <b>High</b> FEMA Hazards in census tract: | Ice storm, Landslide                                      |
| <b>How project addresses hazards:</b> New wastewater collection lines will protect residents and the surrounding environment from possible contamination. New meter panels will ensure residents have safe and reliable access to power.   |       |  |   |
| <b>17. New Beginnings</b>  |       |  | <b>Project:</b> Wastewater                                |
| <b>FEMA NRI National Risk:</b>   | 16.15 | Moderate and <b>High</b> FEMA Hazards in census tract: | <b>Ice storm</b> , Riverine flooding, Winter weather.     |
| <b>How project addresses hazards:</b> Adding a sand filtration system to this ROC's wastewater treatment will eliminate surface discharges of effluent into the surrounding watershed; it will also lower the ROC's operating costs and increase financial resiliency.   |       |  |   |
| <b>18. Wheel Estates</b>   |       |  | <b>Project:</b> Water, Wastewater                         |
| <b>FEMA NRI National Risk:</b>   | 7.51  | Moderate and <b>High</b> FEMA Hazards in census tract: | Landslide   |
| <b>How project addresses hazards:</b> Upgrades to the wastewater collection system will protect the drinking water and surrounding environment from possible contamination. Upgrades to the water system pump house, including installing an emergency power source, will ensure residents have a reliable source of drinking water.   |       |  |   |
| <b>19. Arbor</b>   |       |  | <b>Project:</b> Water, Stormwater                         |
| <b>FEMA NRI National Risk:</b>   | 61.93 | Moderate and <b>High</b> FEMA Hazards in census tract: | Hurricane, Landslide, <b>Riverine flooding</b> , Tornado  |
| <b>How project addresses hazards:</b> Installing a new water distribution system with proper materials will ensure all residents have access to safe drinking water. New stormwater infrastructure will protect residents and their homes from increasingly heavy rain events.   |       |  |   |
| <b>20. HRA</b>   |       |  | <b>Project:</b> Water, Wastewater, Stormwater             |
| <b>FEMA NRI National Risk:</b>   | 45.41 | Moderate and <b>High</b> FEMA Hazards in census tract: | Hurricane, Landslide                                      |
| <b>How project addresses hazards:</b> A new drinking water system combined with wastewater and stormwater upgrades will ensure the health and safety of residents in all weather conditions.   |       |  |   |
| <b>21. Quabbin</b>   |       |  | <b>Project:</b> Water, Stormwater                         |

|  |       |  |   |
|--|-------|--|---|
| <b>FEMA NRI National Risk:</b>   | 36.83 | Moderate and <b>High</b> FEMA Hazards in census tract: | Hurricane, <b>Ice storm</b> ,<br>Landslide                    |
| <b>How project addresses hazards:</b> Upgrades to Quabbin's water distribution system will ensure residents have a reliable supply of drinking water. Stormwater infrastructure will protect residents and their homes during increasingly heavy rain events.  |       |  |   |
| <b>23. Hillcrest</b>   |       | <b>Project:</b> Wastewater, Electric                   |   |
| <b>FEMA NRI National Risk:</b>   | 27.18 | Moderate and <b>High</b> FEMA Hazards in census tract: | Hurricane   |
| <b>How project addresses hazards:</b> Hillcrest's partial electrical replacement project will reduce the risk of fire and power outages. Replacing substandard and failing components of Hillcrest's wastewater collection system will protect their drinking water and the surrounding environment.   |       |  |   |
| <b>24. Royal Crest</b>   |       | <b>Project:</b> Stormwater, Electric                   |   |
| <b>FEMA NRI National Risk:</b>   | 67.79 | Moderate and <b>High</b> FEMA Hazards in census tract: | Hurricane, <b>Riverine flooding</b><br>Coastal flooding       |
| <b>How project addresses hazards:</b> Upgrading Royal Crest's stormwater retention pond and surrounding areas will protect residents and homes in the surrounding area during heavy rainfall. The electrical replacement project will reduce the risk of fire and power outages associated with failing services to ensure the health and safety of residents during extreme weather events. |       |  |   |
| <b>25. Pine Tree</b>   |       | <b>Project:</b> Water                                  |   |
| <b>FEMA NRI National Risk:</b>   | 76.15 | Moderate and <b>High</b> FEMA Hazards in census tract: | <b>Hurricane</b> , Ice storm,<br>Landslide, Riverine flooding |
| <b>How project addresses hazards:</b> New deeper and higher yielding wells combined with appropriate water treatment measures and a new distribution system will ensure Pine Tree's 191 households have safe drinking water.   |       |  |   |
| <b>27. Halifax</b>   |       | <b>Project:</b> Wastewater, Electric, Site Work        |   |
| <b>FEMA NRI National Risk:</b>   | 45.07 | Moderate and <b>High</b> FEMA Hazards in census tract: | Hurricane, Landslide,<br>Riverine flooding                    |
| <b>How project addresses hazards:</b> New on site wastewater treatment will protect the community and the environment from the risk of contamination. Replacing meter panels will ensure safe and reliable electrical service in all weather conditions.   |       |  |   |
| <b>28. North Street</b>  |       | <b>Project:</b> Water, Wastewater, Stormwater          |   |
| <b>FEMA NRI National Risk:</b>   | 58.13 | Moderate and <b>High</b> FEMA Hazards in census tract: | Hurricane, Landslide  |
| <b>How project addresses hazards:</b> New, properly installed water distribution and wastewater collection systems will ensure residents have safe drinking water and greatly reduce the risk of contamination. New stormwater infrastructure will protect residents and their homes from extreme weather events.  |       |  |   |
| <b>29. Bissellville</b>  |       | <b>Project:</b> Electric                               |   |
| <b>FEMA NRI National Risk:</b>   | 4.03  | Moderate and <b>High</b> FEMA Hazards in census tract: | NA  |
| <b>How project addresses hazards:</b> New meter panels will ensure residents have safe and reliable access to power.   |       |  |   |
| <b>34. Lincoln</b>   |       | <b>Project:</b> Wastewater                             |   |
| <b>FEMA NRI</b>  | 59.14 | Moderate and <b>High</b> FEMA Hazards in               | Hurricane, Landslide  |

|  |       |  |                             |
|--|-------|--|-----------------------------|
| <b>National Risk:</b>  |       | census tract:                            |                             |
| <b>How project addresses hazards:</b> Lincoln’s project, which involves replacing failing onsite wastewater infrastructure with a connection to municipal wastewater treatment, will reduce groundwater contamination threat and substantially improve climate resiliency. |       |  |                             |
| <b>35. Sherwood</b>  |       | <b>Project:</b> Wastewater               |                             |
| <b>FEMA NRI</b>  | 22.84 | Moderate and <b>High</b> FEMA Hazards in | Hurricane, Ice storm,       |
| <b>National Risk:</b>  |       | census tract:                            | Landslide                   |
| <b>How project addresses hazards:</b> New properly designed and installed on site wastewater systems will protect residents and surrounding community from potential contamination.  |       |  |                             |
| <b>36. Hillsdale</b>   |       | <b>Project:</b> Wastewater               |                             |
| <b>FEMA NRI</b>  | 53.87 | Moderate and <b>High</b> FEMA Hazards in | Hurricane, Ice storm,       |
| <b>National Risk:</b>  |       | census tract:                            | Landslide                   |
| <b>How project addresses hazards:</b> New properly designed and installed on site wastewater treatment systems will protect residents and the surrounding community from potential contamination.  |       |  |                             |
| <b>37. Ryder Woods</b>   |       | <b>Project:</b> Water, Site Work         |                             |
| <b>FEMA NRI</b>  | 34.84 | Moderate and <b>High</b> FEMA Hazards in | Hurricane, Coastal flooding |
| <b>National Risk:</b>  |       | census tract:                            |                             |
| <b>How project addresses hazards:</b> Retaining walls will protect homesites and homes in this coastal ROC from erosion.   |       |  |                             |

How does your proposal help advance Environmental Justice?

A core principle of Environmental Justice is that all members of society have the right to safe housing and protection from environmental and health hazards. MHCs continue to be a major blind spot for towns and cities across the country when it comes to realizing this principle.

Although MHC residents live in and pay taxes to the towns and cities in which they are located, they rarely receive the same level of services as other residents. While towns own and pay to maintain and replace water and sewer mains in the average neighborhood, they rarely own, operate and replace water and sewer mains in MHCs. Similarly, while electrical utilities are typically responsible for electrical infrastructure up to the service connection point at a homeowner’s home in the average neighborhood, this is not the case in MHCs where there is generally “secondary” electrical infrastructure between the utility-owned equipment at the entrance of communities and homeowner-owned equipment inside of the homes.

In both of these cases (water and sewer mains and secondary electrical infrastructure), the MHC has to shoulder the direct operation and maintenance costs, as well as replacement. These costs are shared by a very small group of low-income homeowners. This places a heavier cost burden on individual MHC homeowners than other residents of a city or town.

Additionally, as described above in Exhibit C (p.13) there are many barriers for MHCs to access federal funding sources that towns rely on to keep tax rates affordable for their populations. Two of the Federal programs that are technically open to ROCs directly, USDA Rural Development and EPA water, wastewater and stormwater infrastructure funding, cannot be accessed in most cases. As the table on p.15 indicates, only 30% of our clients are able to access USDA-RD funds, only 32% can access EPA Drinking Water SRF and only 19% can access Clean Water SRF.

When MHCs are able to use these funds, there are additional challenges for these under-resourced communities to manage these complex projects.

For other infrastructure needs, including electrical infrastructure, federal funding for an MHC must be passed through the towns, which often aren't willing or able to work with MHCs to obtain this funding due to limited availability for many competing projects, and/or limited capacity to administer additional Federally-funded infrastructure projects. Additionally, in the absence of specialized technical assistance provided by programs like WISP, towns are typically less receptive to taking on these projects given the additional work and obstacles involved.

As a result of these factors, MHCs in aggregate pay the same taxes as other residents but receive less services and are burdened with both the hazards that come along with substandard, unsafe infrastructure and the challenges and costs associated with maintenance, repair and replacement. This is an inequitable situation that WISP aims to overcome.

### **Subfactor (b)(iv):Community Engagement**

#### How will you seek and encourage diverse stakeholder participation?

Engaging with ROC residents—including those that don't usually show up to board meetings—to gather information, and build understanding and trust, is a critical component of our work. After all, residents are also the owners of the property and entitled to be informed and have a say in what happens in their community. In addition, most construction work is disruptive, typically requires access to each resident's home site—and sometimes inside or under the home—and can result in a disruption of services. Clearly communicating with all residents about these issues well ahead of time is essential to keeping a project on schedule and on budget. Residents also have an in-depth knowledge of how their ROC's infrastructure works or fails to work in all conditions, and their observations are key to forming a good set of plans.

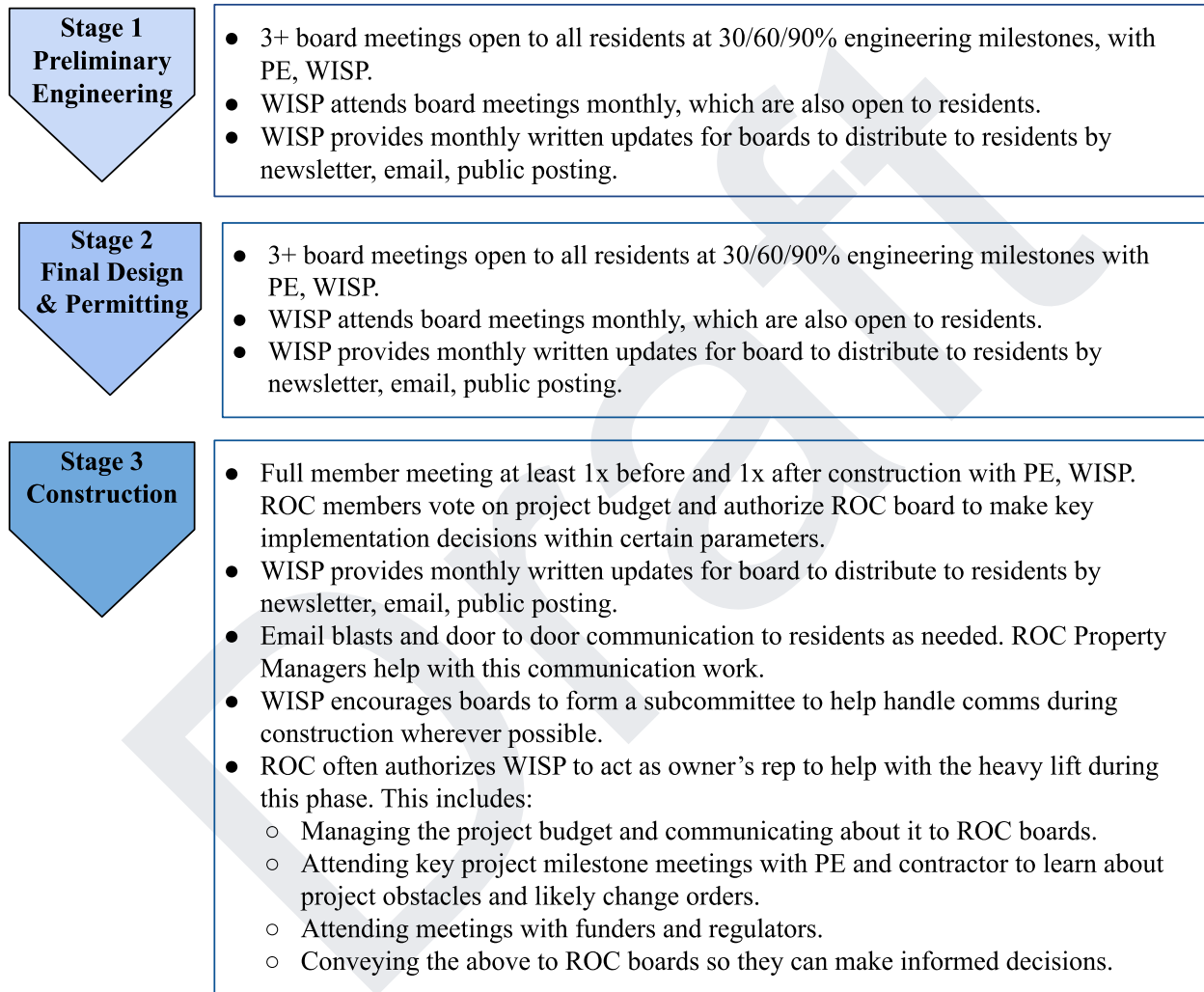
As described below (Exhibit E, p.32), NEROC has 15 years of experience in this work, through which we have developed a deep understanding and effective practices for working with MHC residents. One of the most important roles that WISP holds in these projects is to keep the project moving forward, acting as the liaison between the multiple parties involved, and bridging gaps in knowledge and understanding. WISP staff have substantial experience liaising between residents and engineers, contractors, regulators, and funders, who are often not the best at communicating technical jargon to the residents.

Without this liaison role in place, construction costs can easily escalate. Contractors often have biases or a lack of knowledge of these specific communications considerations related to MHCs. We have seen that without a communication structure and assurances in place, they will greatly mark up their prices, if they bid at all. WISP staff are able to ensure that MHC residents receive fair rates and treatment and build relationships with contractors.

Close coordination with most towns in which our projects are located is also required, given planning and permitting requirements, and given that many of our ROCs are connected to their water (68%) and sewer infrastructure (42%). We have already actively engaged many local governments in our projects, either through providing grants, sponsoring a grant, or helping with a connection to a municipal service. See the table of leveraged funds in Exhibit F, p.38, for details on applications and funds secured in collaboration with local governments.

Additionally, since the launch of the program in March 2023, WISP has been coordinating with regulators, funders and lenders across our service area to identify and resolve challenges to funding and construction and to develop our networks of specialists (engineers, contractors, etc.)

We have long-standing relationships with the ROCs in our PRICE application and have already conducted multiple rounds of direct communication with each ROC in preparing this application—including calls with each ROC board on our PRICE list, and readiness surveys filled out by each ROC. In conducting the proposed activities, we will use the existing approach that WISP has developed for its infrastructure projects, which is organized by project stage:



How does your proposal align with existing community plans and policies?

WISP has conducted a survey of comprehensive plans at each of the 32 municipalities in which our 37 PRICE projects are located. Nearly every plan mentions the dire need for affordable housing preservation and 25% of the plans specifically mention the importance of preserving and developing MHCs to achieve their affordable housing goals.

WISP maintains an up-to-date list of funding policies aligned with the program in each state in our service area. Below are highlights of state funding policies that align with WISP’s work:

**Table 8: State Funding Policy Alignment**



**Table 8: State Funding Policy Alignment**

| State               | Status  |
|---------------------|---|
| <b>Vermont</b>      | We regularly attend funder meetings in VT, where policies allow multiple funding sources for projects. In addition to the federal sources some VT ROCs can apply for directly (USDA, DWSRF and CWSRF, see table 5, p.15), ROCs in the state often use CDBG/VCDP, VHCB, CDS, VHFA for project funding. VT also made a substantial amount of ARPA funding available for MHCs. As a result, we have made the most progress in VT, to date. All 16 ROCs in the state have secured some project funding with support from CDI or our partner-consultants totaling \$16.8MM. We reference these policies as a model for other states. |
| <b>Maine</b>        | Effective in FY24, ME DWSRF implemented a policy change: The first 10% of the state’s DWSRF funds are reserved for MHCs that have Public Water Systems. Three of our PRICE projects have leveraged funding thanks to this new carveout.   |
| <b>Mass.</b>        | Massachusetts amended its Affordable Housing Trust Fund (AHTF) legislation to allow funding of MHC projects in 2022. This change provided \$1.9 million in funding to allow residents of Royal Crest to purchase their community without pushing rents to unaffordable levels. The AHTF is now considering funding applications for two MHCs per bi-annual funding cycle. Two of our ROCs, Pine Tree and North Street, have applied for their infrastructure projects.  |
| <b>Rhode Island</b> | RI allows ROCs to apply directly for DWSRF and CWSRF. All 3 PRICE projects will apply to CWSRF to leverage funding for their projects. DWSRF recently provided 100% principal forgiveness to Hillsdale to overhaul the community’s water infrastructure.  |

WISP actively tracks obstacles to permitting and funding, engaging with funders and regulators to address these issues, and identifying policy changes that will further support our work.

In Maine, we have identified that six ROCs *may* be eligible for CWSRF funding for wastewater projects (as identified in the table above, p.15), given that the Maine Statute states that “privately owned water quality protection projects” are eligible, although there is no mention of private applicants or MHCs in CWSRF’s most recent intended use plan (06-096 CMR Chapter 595(s)). We are engaging in relationship-building and will support policy work to try to open up this source of funding for Maine ROCs during our proposed performance period.

In Massachusetts, a DWSRF policy change would make these funds available to the four ROCs in the table above (p.15). The 2024 intended use plan for DWSRF indicates that their short term goal is to “implement assistance programs for small and very small [privately owned Public Water Systems] that may need additional assistance with complying with the requirements of the Safe Drinking Water Act.” However, the program’s private borrower policy is currently too stringent to work with our ROCs which have pledged most of their collateral to secure purchase loans. We will work with this funder to try to open up this program for these Mass ROCs.



### Exhibit E—Scoring Factor (c):Capacity

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

The development and success of the WISP program builds on the expertise and years of experience of the 11-member staff of the NEROC program, which is the foundation of CDI's work with MHCs. As noted above, NEROC has supported the conversion of 59 MHCs to resident-ownership throughout New England, leveraging a total of \$268MM in financing since launching in 2009. Each acquisition is a complex and time sensitive project which involves working with residents to secure financing to purchase the land underneath their homes, on the one hand, and helping residents to develop the governance and management systems required to run a commercial real estate business, on the other.

Each ROC acquisition process involves procuring an engineer to conduct a property conditions assessment that identifies deficiencies in the MHC's infrastructure and provides the ROC with a recommended 10-20 year schedule with which to carry out the infrastructure upgrades. As discussed above, because for-profit MHC ownership tends to discourage sufficient reinvestment into MHC infrastructure and infill upgrades, nearly every newly-formed ROC has inherited a substantial multi-year project list that NEROC has helped the ROC to coordinate and manage post-purchase, along with ongoing day-to-day operations and management, budgeting, loan compliance, and legal and regulatory compliance support. Notable examples of this infrastructure project management work include:

- In 2017, CDI assisted residents of New Beginnings in Beekmantown in northern NY to establish a resident-owned community after the former park-owner informed tenants that the community would be closed due to the cost of installing wastewater treatment infrastructure required by NY State Department of Environmental Conservation. After forming a ROC and acquiring the MHC to avoid the closure, CDI helped secure \$975,196 in grant funding (including \$445,196 in CDBG) to install a wastewater treatment facility on the property. This project was managed by Jeremiah Ward, who led the development of the budget, and coordinated work with the ROC, project engineer, contractor, DEC, and Clinton County, which helped administer the CDBG portion of the project. Marguerite Hart, Secretary of New Beginnings, provided the following assessment of CDI's work on the project: *“Without CDI's assistance our community would not exist. No one in our community had the resource knowledge or experience necessary to take the steps required to keep us in our homes and acquire the funding for the upgrades we needed to ensure our future. Our two consultants worked tirelessly to help us in too many ways to list here and continue to support and guide us in each new step as it arises.”*
- In 2019, CDI collaborated with Genesis Community Loan Fund, the City of Rockland and Maine Department of Economic and Community Development (DECD) to deploy \$1.41MM in CDBG funding to carry out targeted infrastructure upgrades in six Maine ROCs. CDI acted as owner's rep and coordinated work with each ROC, the project engineer, and contractors. Genesis prepared pay requests and handled grant administration on behalf of Rockland. James Hester, Grey Stone board member, provided the following review of CDI's work: *“CDI helped us obtain the CDBG which allowed us to upgrade our current water and sewer system which we would not have been able to do without that grant. For that we are so thankful!”*
- In 2015, CDI helped residents of Windy Hollow in Castleton VT purchase their MHC after 3+ years of negotiating and fundraising efforts. Faced with years of deferred maintenance and the challenge of maintaining affordable lot rents, CDI assisted in securing \$364K in

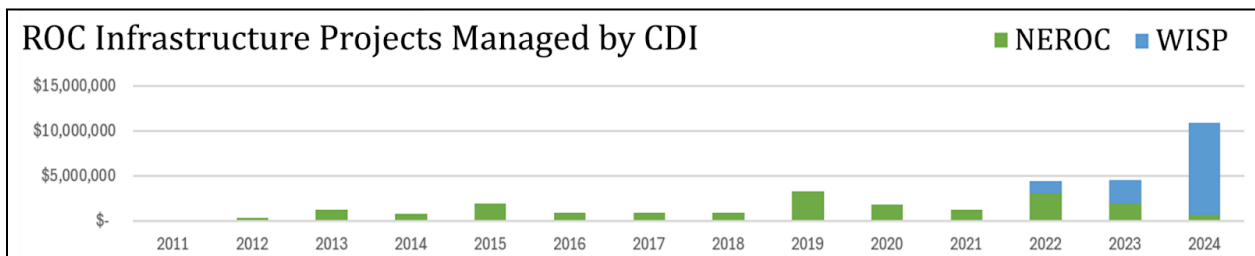
CDBG grant funding. This funding was to replace the contaminated and unpermitted well, along with other necessary upgrades to the drinking water infrastructure. However, as the project progressed, the community’s wastewater systems began to fail and the project costs escalated. CDI secured an additional \$166K in CDBG and loans totaling \$190K to address the issue. The project was managed by Annik Paul, who coordinated with the ROC, lenders, project engineer, DHCD, the town of Castleton—which helped administer the CDBG portion of the project—and the eventual procurement of a partner consultant who, with CDI staff support, was able to raise an additional \$832K to continue replacing the wastewater systems. Windy Hollow’s board shared, in the 2020 CDI Client Survey, *“If not for the help of CDI (Annik Paul) we wouldn’t have been able to get organized and trained properly.”*

In total, since 2009, NEROC has helped our ROCs manage over \$19.5MM in completed infrastructure upgrades utilizing a mixture of replacement reserves (\$9MM), construction loans (\$5.5MM), and grants (\$5MM). The experience gained while managing these projects under NEROC has laid the foundation for the launch of WISP in 2023.

What is your experience using grant funds?

CDI has decades of experience using federal grants. In the past five years we have received and managed a total of \$4MM in USDA Rural Development grant funds in support of our technical assistance and training activities, including Rural Community Development Initiative, Rural Cooperative Development, Socially Disadvantaged Group, and Technical Assistance and Training Program, Manufactured Homes grants. We are also current recipients of HUD Economic Development Initiative—Community Project Funding grants totaling \$3.29MM. We have established financial and administrative systems for tracking and managing multiple projects with diverse funding sources, including Federal grants, according to applicable conditions, regulations and agreements, from application to close-out. CDI’s Executive Director, Finance Director, Program Directors and Grants Manager coordinate on an ongoing basis to ensure all grant-funded activities are within budget, on schedule, and meeting deliverables.

In March 2023 CDI launched the WISP program with a \$500,000 grant from the USDA Technical Assistance and Training Program, Manufactured Homes grant along with seed funding from Vermont Housing Finance Agency and Vermont Housing and Conservation Board. With established administrative and financial systems in place for managing federal grants, WISP program director Jeremiah Ward quickly built out the program, and established a team that includes a full time Program Associate and a part time Program Assistant. During the first 12 months of the performance period, WISP has developed a pipeline of 30 MHC projects across the northeast, is managing \$4 million in existing ROC infrastructure projects that were in process before the program’s launch, and has leveraged an additional \$10 million for ROC infrastructure projects, with just under \$300,000 in program expenditures.



CDI's WISP staff have years of experience supporting clients in successfully applying for and managing grant funding for ROCs, including the following: CDBG, USDA-RD, ARPA, Vermont Housing and Conservation Board and the Massachusetts Affordable Housing Trust Fund. WISP staff are also currently working on ROC infrastructure projects using Drinking Water SRF, Clean Water SRF, and HUD and EPA Congressionally Directed Spending awards.

#### Who are your key staff?

The key staff for this project include the core WISP team, which is currently composed of two full-time and one part-time staff members, with the planned addition of staff members to support the proposed expansion of WISP activities. Key staff and roles are described below.

#### **Jeremiah Ward: Water Infrastructure Support Program (WISP) Director**

Jeremiah has 13 years of experience working with MHCs, as a Cooperative Development Specialist under CDI's NEROC Program and as director of WISP. He has led over a dozen ROC acquisitions and managed dozens of ROC infrastructure and infill projects.

Project role:

- Project coordination, partner collaboration, and program leadership.
- Ensuring that project milestones, performance goals, and budgets are met.
- Overseeing all tracking, management, and reporting of outputs and outcomes for all ROCs assisted during the performance period.
- Managing the grant program and staff performing the work.
- Coordinating with WISP and NEROC staff to align organizational resources needed to support the grant program.
- Organizing and leading stakeholder tables and meetings as required to advance the goals of the program.
- Leading the planning, organization and management of the ROC infrastructure pipeline.
- Creating and overseeing systems to catalog work being performed with clients.

#### **Annik Paul: WISP Program Lead Associate**

Annik has worked in the manufactured housing sector since 2014, holding many roles including advocating for residents' rights, providing pre- and post-purchase technical assistance to resident owned communities, and supportive roles such as state manager. Before rejoining CDI in 2023, Annik worked for 1 year as a Relationship Manager for ROC USA.

Project role:

- Directs overall communication strategy between WISP and ROCs per the resident input protocol discussed on p.29.
- Compiles and develops resources for ROCs to guide them through the project (e.g., guides on RFQ's, NEPA reviews, Contractor procurement, stages of the project guide).
- Completes funding applications for ROC projects for ROCs with additional capital needs.
- Manages development budgets for ROC infrastructure projects.
- Acts as Owner's Representative representing ROCs during the course of their construction projects in Vermont, liaises between all parties involved in project
- Ensures legal and regulatory compliance of ROC projects, including compliance with federal crosscutters

#### **Stephen Belcher: WISP Program Associate**

- Conducts ROC capacity evaluations, distributes resources and helps ROC implement work plans to prepare for project implementation
- Collects data for environmental reviews

- Assists with engineering and contractor procurement
- Conducts resident income surveys where necessary
- Completes funding applications for ROCs with additional capital needs
- Manages development budgets for ROC infrastructure projects
- Acts as Owner's Representative representing ROCs during the course of their construction projects in Vermont, liaises between all parties involved in project
- Ensures legal and regulatory compliance of ROC projects, including compliance with federal crosscutters

With support from the PRICE grant, we will hire 3 **additional WISP Program Associates** to expand our capacity to work with the ROCs in Southern New England (two additional Associates) and Maine (one Associate) identified in the PRICE project list.

**Grant management support** will be provided by CDI's Grants Manager, David Court, and Finance Director, Alyson Frederick. They will coordinate on the following tasks:

- Preparing financial reports, issuing invoices, ensuring accounts payable are current
- Meeting regularly with the program team to review expenditures and budgets to actuals
- Tracking labor and expenses indirectly related to the program
- Tracking labor and expenses directly related to the program
- Preparing and submitting interim and final performance reports

In addition, our work under this proposal includes comprehensive support from engineering firms that will work with WISP and the ROCs throughout every stage of these projects, including implementation and closeout. We will use our curated list of over 30 firms across the Northeast that work with ROCs and federal funding sources to help procure this assistance.

Finally, our budget includes procuring a CDBG consultant to provide the WISP team with extra support navigating overall program rules and regulations, project procurement materials and procedures, and to assist with Davis Bacon compliance where needed.

What is your experience promoting racial equity?

Equal opportunity and racial justice are integral to CDI's mission to create and sustain democratically owned, cooperative enterprises and networks in the Northeast. CDI has been increasingly developing strategies to train, partner with, and raise funding for BIPOC, immigrant and other diverse groups and cooperative developers so that their capacity is expanded to serve their communities. We work with immigrant/refugee groups, Black and Indigenous farmers, and women of color throughout the Northeast to increase access to resources, opportunities for ownership, and economic stability through cooperative development.

Since 2017, building on our long-standing and strong relationship with the USDA's Rural Development office, we have successfully secured Socially-Disadvantaged Group Grant funds to provide no-cost cooperative development education and technical assistance for BIPOC groups forming cooperative enterprises. In partnership with the Cooperative Fund of the Northeast (CFNE), we have secured regular annual funding from the MA Growth Capital Corporation, with which we have continued to build out our training and development services for BIPOC-owned businesses and majority-minority workforces, in both English and Spanish. We have also built out our cooperative developers training program, funded by a USDA Rural Community Development Initiative grant, to provide culturally appropriate training for BIPOC and immigrant-led groups, helping to cultivate a new generation of diverse co-op developers implementing CDI's proven

strategies in culturally-appropriate ways, and building long-lasting and high-value relationships with diverse communities.

In 2023, we launched the Immigrant Services program, which developed from the above mentioned initiatives and partnerships as well as alliances and work we have been doing with various regional organizations such as the Massachusetts Coalition of Domestic Workers, Casa del Trabajador (MA), Fuerza Laboral (RI), Unidad Latina (CT), and Manos Unidas (MA). Immigrant Services foregrounds a language justice approach to working with immigrant communities in a culturally appropriate manner, providing technical assistance and training for culturally and linguistically diverse communities, and working to form a coalition of immigrant cooperative developers in the Northeast. We have begun to integrate the language justice resources and tools developed by Immigrant Services into our work with ROCs, which will supplement the partnerships the NEROC program already has in place across the region to provide interpretation services during meetings and translation of documents.

Most recently, CDI partnered with CFNE to launch the Northeast Transition Initiative (NETI) in 2023, with funding from the Wells Fargo Foundation, which focuses on addressing the racial wealth gap by pursuing employee-ownership conversions for businesses with BIPOC workforces. NETI brings together partners including experienced conversion practitioners from the rural northeast with newer players in the conversion space who focus on BIPOC workforces, including Apis and Heritage and Boston Impact Initiative. Through this collaboration, NETI is pursuing strategies to foster more cultural competency and capacity to support BIPOC worker-owners in acquiring their businesses, as well as to build a pipeline of conversion practitioners rooted in BIPOC communities, developing long-lasting capacity to grow BIPOC worker wealth.

What is your experience completing environmental reviews?

WISP has extensive experience conducting environmental reviews for infrastructure replacement projects. We typically follow the approach outlined in 24 CFR part 58 of working with state agencies acting as the Responsible Entity (RE). For the majority of our ROC infrastructure projects, we help clients procure an engineer that has extensive experience with federal funding and carries out the data gathering for NEPA review. In cases where a NEPA review has been required to obtain funding before procuring an engineer, WISP has mined all the required data in-house as well. Our infrastructure replacement projects generally qualify for either: Categorical Exclusion (CATEX) for projects where infrastructure is upgraded in place and without significant material changes; or a Finding of No Significant Impact (FONSI) for more complex projects.

Are you familiar with cross-cutting federal requirements?

CDI's long track record of successful federal grant management attests to our experience in following the compliance requirements of 2 CFR 200, including regulations pertaining to financial management and internal controls, procurement, and subrecipient monitoring and management. Across the numerous federal grants we receive, we demonstrate effective control over and accountability for all funds in accordance with 2 CFR 200 cost principles, financial and performance reporting requirements, closeout and audit requirements. Procurement of contractors, typically coordinated by hired engineering firms, is conducted in accordance with 2 CFR 200 procurement standards. The work to be bid is generally higher than the current Simplified Acquisition Threshold (SAT) of \$250,000, so a formal, sealed bidding process is used in most cases. For projects below the SAT that are eligible to follow the small purchase



procedures, all of our clients have procurement policies in place that fulfill the requirement for multiple price and rate quotations, and CDI has ample experience helping ROCs procure to this standard with or without engineers

Davis-Bacon (D-B): Our ROC infrastructure projects generally involve hiring an engineer to support all stages of a project, including construction administration. D-B compliance is included in the engineer’s scope as part of the process of inspecting the contractor’s work and preparing payment certifications. For cases where construction administration engineering isn’t needed, such as a small repair to an electrical system like replacing a meter panel in place, we have generally hired an experienced contractor to help carry out D-B compliance.

Fair Housing and Equal Opportunity: In our client-facing work, CDI provides ROCs with training on Fair Housing regulations pertaining to applications from home buyers, ensuring that Fair Housing materials are provided with applications and at the time of application interview. CDI also provides regular training to ROCs on Reasonable Accommodations. In our construction projects, we work closely with the project engineer and contractors to ensure compliance with Fair Housing regulations that pertain to accessible public spaces and routes, where applicable. Our procurement process includes nondiscrimination clauses on bidding materials, we actively solicit MBE/WBE participation for CDBG projects, and contractors are encouraged to submit MBE/WBE utilization plans in their bids.

As our proposed construction projects will not require people to be relocated, the Uniform Relocation Act will not apply to our projects under this application.

The below table outlines previously awarded CDBG grants that we have received and managed for infrastructure projects in accordance with the above cross-cutting federal requirements.

**Table 9: CDBG Grant Experience**

| <b>HUD Project</b>  | <b>State</b> | <b>Award</b>       | <b>Project Description</b>  | <b>Status</b> |
|---|--------------|--------------------|---|---------------|
| Breezy Acres and HROC   | VT           | \$1,300,000        | 2022 CPF for electrical upgrades  | In process    |
| Shelburnewood   | VT           | \$59,780           | 2020 VCDP Planning grant, MHC expansion   | In process    |
| Windy Hollow  | VT           | \$530,000          | 2015 VCDP water & sewer upgrades,   | Complete      |
| ANDCO   | VT           | \$687,882          | 2023 CPF for new manufactured housing   | In process    |
| New Beginnings  | NY           | \$445,196          | 2018 NYS-CDBG new wastewater treatment  | Complete      |
| Pemaquid, Medomak, Deer Ridge, Sunset Acres, Grey Stone, Sunset Terrace | ME           | \$1,410,000        | 2018 DECD-CDBG for water, wastewater, storm water and electrical upgrades at 6 ROCs, complete | Complete      |
| Charter Oaks  | ME           | \$69,012           | 2023-DECD-CDBG to replace failed onsite wastewater system                                     | Complete      |
| Deer Ridge  | ME           | \$215,000          | 2023-DECD-CDBG to replace failed onsite wastewater system                                     | In process    |
| <b>Total</b>  |              | <b>\$4,716,870</b> |   |               |

**Exhibit F—Scoring Factor (d): Match or Leverage**

**Table 10: Leveraged Funds**

|                          | <b>Leveraged Funds</b> | <b>Sources</b><br>(* = local government support)        |
|--------------------------|------------------------|---|
| <b>VERMONT</b>           |                        |   |
| Breezy Acres and HROC    | \$1,437,600            | CDS-HUD, Reserves                                       |
| NAC                      | \$3,906,999            | CDS-EPA, VHCB, ARPA-3A, Burlington HTF*, ARPA, Reserves |
| Westbury                 | \$500,000              | Construction Loan                                       |
| Shelburnewood            | \$59,780               | CDBG*   |
| Weston’s                 | \$1,325,000            | ARPA  |
| Sunset Lake              | \$1,368,250            | ARPA  |
| <b>MAINE</b>             |                        |   |
| Mountainside             | \$2,981,550            | CDS-HUD, SRF  |
| Charter Oaks Village     | \$353,500              | SRF   |
| Wardtown                 | \$292,900              | SRF   |
| <b>NEW YORK</b>          |                        |   |
| New Beginnings           | \$850,000              | NYHFA   |
| <b>MASSACHUSETTS</b>     |                        |   |
| Arbor                    | \$250,000              | Reserves  |
| Pine Tree Village        | \$1,835,000            | CDS-HUD, EPA-EC-SDC                                     |
| North Street Association | \$326,840              | Construction Loan                                       |
| Heritage Residents Ass.  | \$550,000              | ARPA*, Reserves   |
| <b>TOTAL LEVERAGED</b>   | <b>\$16,037,419</b>    |   |

Contingency Plan

The primary funding risk for our proposed project is being awarded less funding than requested through PRICE. In the event that we are awarded less funding than requested, we will use the scores assigned to projects, as detailed in table 3, p.6, to prioritize and/or scale down projects within each state to be included in a reduced project list. As defined in our scoring criteria, table 6 (p.16), we would prioritize projects based on infrastructure condition, the threat to housing affordability, project readiness, lack of project funding alternatives, and climate vulnerability.

Additionally, our proposed projects generally can be divided into discrete stages so that targeted improvements can still take place with a reduced award amount. Furthermore, since our proposal includes providing ongoing fundraising technical assistance to ROCs, we can still work with ROCs to leverage a smaller PRICE award to raise additional capital from other sources. For example, a reduced award at Hillsdale will still allow the ROC to replace the worst of its onsite wastewater treatment infrastructure while WISP works with the ROC to raise capital for additional upgrades from other sources such as CWSRF.

### **Exhibit G—Scoring Factor (e): Long-term Effect.**

As described above, the ROCs featured in this application have taken the first key step towards preserving their housing affordability by purchasing their MHCs and structuring them according to the ROCUSA Resident Ownership Model (See Affordability and Equity, p.19.). This model has successfully ensured long-term housing stability and affordability among 320 ROCs across the country by: (1) eliminating profit-driven rent increases by converting to resident ownership; (2) including dissolution restrictions that permanently remove the MHC from the speculative real estate market; (3) requiring a limited-equity structure to ensure the housing remains affordable for future generations; (4) requiring provisions in the corporate documents which ensure there are no barriers to participation among LMI households and protected classes and that affirmatively market housing opportunities to LMI households; and (5) ensuring that ROC members are provided a perpetual lease. While each ROC is currently required to follow these provisions in their corporate documents and in their long-term contracts with CDI and their mortgage lenders, CDI proposes making them permanent via a recorded covenant as a condition of receiving PRICE funding.

In addition, this proposal is geared towards helping ROCs take the second key step required to ensure their housing remains sustainable and affordable for generations to come: A \$28.55 million PRICE investment will help 37 ROCs upgrade their substandard infrastructure and create long-term savings for 3,860 primarily LMI families—a relatively modest investment of \$7,400 per household. As we have noted, the significant cost of these infrastructure upgrades is difficult for small communities of low-income households to cover without raising lot rents to unaffordable levels. Without PRICE, these projects would most likely be debt financed with market rate loans, assuming there is sufficient collateral to allow for borrowing (see need #3, p.13). On average, lot rents would need to increase \$72 per month to finance our proposed PRICE projects over a 30 year period. A PRICE investment of \$7,400 per home will save the average household nearly \$26,000 over 30 years in debt payments alone. Furthermore, ROC residents will also benefit from the years of savings that will result from infrastructure upgrades that reduce ongoing (and often escalating) operations and maintenance costs, ranging from high water bills caused by leaking pipes and failing water systems for ROCs like North Avenue Cooperative and Arbor Residents Association, to the cost of the trucking sewage offsite for treatment at Mountainside.

Beyond these long-term cost-reducing effects that support the ongoing affordability of ROC housing, our proposed projects will pave the way for the addition of 104 new housing units, expanding opportunities for the long-term affordable homeownership that the ROCUSA model offers. This includes the creation of 28 new lots at Shelburnewood as well as working to fill the 76 vacancies at all 37 ROCs on our project list, where substandard infrastructure has obstructed installing new homes. Breezy Acres, for instance, has a number of empty lots that cannot be filled before the proposed electrical work is completed. This will bring extra lot rent income into these communities and further bolster their financial resiliency.

Another significant long-term effect of our proposed projects will be the reduction of environmental and safety risks that will be secured, as described in Environment and Resilience, p.22, and detailed in table 7, p.23. Our proposed activities will prevent the health hazards of failing wastewater systems and the safety risks of failing or substandard electrical systems, reduce the vulnerability of water systems to disruptions from winter and extreme weather and reduce the damage and maintenance costs of stormwater on lots, housing units, and shared

infrastructure. Left unaddressed, these and related issues would have cascading effects on the safety and resilience, and in some cases viability, of the ROCs, as well as the surrounding environments. These mitigation impacts will be in place for generations to come.

Finally, PRICE funds would be an important investment in WISP, which is a first-of-its-kind program that has already made significant headway in its pursuit of environmental and housing justice for underserved ROC residents by ensuring that they have access to the subsidized infrastructure funding that has historically been denied to them. This investment will enable us to further expand our capacity, opening up access to WISP infrastructure TA for all 59 ROCs in our service area—a total of 5,816 households. Further, CDI has established an average of 4 new ROCs per year since the launch of NEROC in 2009, and will continue to pursue conversions of the region’s 3,900+ manufactured housing communities, consisting of a total of 179,500 households—a substantial number of which could become long-term affordable housing for underserved LMI populations. As new ROCs are developed in our region, WISP will be in place to provide this crucial support from the beginning of these conversion projects.

Beyond our region, WISP has the potential to set precedent and serve as a model for similar programs across the country. For example, every time there is a policy win in a state in which WISP works—such as the new MHC carveout for Maine MHCs to use the Drinking Water SRF program discussed on p.30—WISP communicates with other states to advise adopting best practices. As part of the ROCUSA network, the strategies we are developing for providing this specialized technical assistance and navigating the barriers and challenges involved can be shared across the network to fill this critical gap in support for ROCs and MHCs, catalyzing the long-term effects we have identified above.

## Attachment A: Advancing Racial Equity

The table below contains demographic data for the Census Block Groups in which the ROC's featured in CDI's PRICE application are located.

| ROC             | Block Group                        | Pop. | Hispanic / Latino | White | African American | American Indian | Asian | Other | Two or more |
|-----------------|------------------------------------|------|-------------------|-------|------------------|-----------------|-------|-------|-------------|
| <b>Vermont</b>  |                                    |      |                   |       |                  |                 |       |       |             |
| NAC             | Block Group 1; Census Tract 1      | 1826 | 3.0%              | 81.6% | 3.0%             | 0.1%            | 6.4%  | 0.3%  | 5.7%        |
| Shelburnewood   | Block Group 1; Census Tract 34.01  | 2857 | 2.5%              | 88.9% | 1.0%             | 0.2%            | 1.8%  | 0.8%  | 4.9%        |
| Westbury        | Block Group 2; Census Tract 22.02  | 2898 | 1.9%              | 87.8% | 1.3%             | 0.2%            | 3.6%  | 0.4%  | 4.8%        |
| Breezy Acres    | Block Group 1; Census Tract 22.02  | 2069 | 1.6%              | 88.1% | 0.9%             | 0.3%            | 4.9%  | 0.1%  | 4.1%        |
| Hillcrest       | Block Group 1; Census Tract 22.02  | 2069 | 1.6%              | 88.1% | 0.9%             | 0.3%            | 4.9%  | 0.1%  | 4.1%        |
| Weston's        | Block Group 1; Census Tract 9545   | 1403 | 1.5%              | 92.0% | 0.6%             | 0.0%            | 0.9%  | 0.6%  | 4.3%        |
| Sunset Lake     | Block Group 5; Census Tract 35.02  | 1102 | 1.4%              | 93.9% | 0.1%             | 0.5%            | 0.5%  | 0.1%  | 3.6%        |
| <b>Maine</b>    |                                    |      |                   |       |                  |                 |       |       |             |
| Charter Oaks    | Block Group 2; Census Tract 260    | 2709 | 1.5%              | 93.4% | 0.3%             | 0.2%            | 0.6%  | 0.3%  | 3.6%        |
| Wardtown        | Block Group 2; Census Tract 45.01  | 1837 | 2.0%              | 91.2% | 0.8%             | 0.3%            | 1.1%  | 0.6%  | 4.0%        |
| Brunswick Bay   | Block Group 2; Census Tract 112.03 | 1090 | 1.7%              | 91.5% | 0.5%             | 0.2%            | 1.5%  | 0.3%  | 4.4%        |
| Pemaquid        | Block Group 2; Census Tract 9756   | 1313 | 1.1%              | 95.0% | 0.6%             | 0.2%            | 0.5%  | 0.2%  | 2.3%        |
| Medomak         | Block Group 3; Census Tract 9752   | 1242 | 1.1%              | 94.0% | 0.3%             | 0.2%            | 0.9%  | 0.5%  | 3.0%        |
| Deer Ridge      | Block Group 1; Census Tract 101    | 1412 | 1.8%              | 90.2% | 0.3%             | 1.3%            | 0.5%  | 0.4%  | 5.0%        |
| Sunset Terrace  | Block Group 2; Census Tract 9706   | 851  | 1.1%              | 93.3% | 0.7%             | 0.5%            | 0.7%  | 0.0%  | 3.8%        |
| Mountainside    | Block Group 1; Census Tract 9702   | 826  | 1.0%              | 94.7% | 0.1%             | 0.1%            | 1.0%  | 0.6%  | 2.5%        |
| Grey Stone      | Block Group 2; Census Tract 50     | 924  | 0.9%              | 93.8% | 0.4%             | 0.6%            | 2.1%  | 0.2%  | 1.9%        |
| <b>New York</b> |                                    |      |                   |       |                  |                 |       |       |             |



|                      |                                     |      |       |       |      |      |      |      |      |
|----------------------|-------------------------------------|------|-------|-------|------|------|------|------|------|
| New Beginnings       | Block Group 4; Census Tract 1006    | 986  | 2.9%  | 89.4% | 1.0% | 0.1% | 0.6% | 0.7% | 5.3% |
| <b>Massachusetts</b> |                                     |      |       |       |      |      |      |      |      |
| Wheel Estates        | Block Group 1; Census Tract 9214    | 698  | 4.6%  | 88.1% | 1.1% | 0.0% | 0.3% | 1.0% | 4.9% |
| Arbor                | Block Group 2; Census Tract 8125    | 1401 | 10.9% | 82.2% | 1.3% | 0.6% | 1.4% | 0.3% | 3.3% |
| Heritage             | Block Group 3; Census Tract 8128    | 2453 | 4.0%  | 90.0% | 0.8% | 0.0% | 1.0% | 0.3% | 3.8% |
| Quabbin              | Block Group 1; Census Tract 8201.01 | 2580 | 3.8%  | 90.2% | 0.8% | 0.1% | 0.7% | 0.4% | 4.0% |
| Meadowbrook          | Block Group 2; Census Tract 3223    | 1441 | 7.9%  | 81.9% | 1.2% | 0.0% | 1.1% | 2.2% | 5.6% |
| Rustic Pines         | Block Group 1; Census Tract 6302.01 | 1047 | 1.4%  | 93.4% | 0.9% | 0.0% | 1.3% | 0.7% | 2.3% |
| Oak Hill             | Block Group 4; Census Tract 6131    | 1258 | 2.2%  | 87.4% | 3.2% | 0.1% | 2.0% | 1.0% | 4.2% |
| Colonial Estates     | Block Group 3; Census Tract 6131    | 1730 | 3.0%  | 87.3% | 2.9% | 0.2% | 1.6% | 0.6% | 4.3% |
| Hillcrest Mobile     | Block Group 1; Census Tract 5401.01 | 1151 | 1.7%  | 92.8% | 0.2% | 0.0% | 0.9% | 0.7% | 3.8% |
| Royal Crest          | Block Group 1; Census Tract 5451    | 1561 | 2.9%  | 79.8% | 3.0% | 0.5% | 0.4% | 3.3% | 9.9% |
| Pine Tree Village    | Block Group 1; Census Tract 5442    | 1844 | 2.0%  | 90.9% | 0.5% | 0.0% | 0.6% | 1.1% | 4.8% |
| Conifer Green        | Block Group 1; Census Tract 5091.01 | 2105 | 1.8%  | 92.8% | 0.3% | 0.0% | 1.9% | 0.4% | 2.8% |
| Halifax              | Block Group 4; Census Tract 5261    | 1533 | 1.3%  | 94.2% | 0.8% | 0.0% | 0.5% | 0.8% | 2.3% |
| Park Place           | Block Group 1; Census Tract 2101    | 2633 | 5.8%  | 85.9% | 1.4% | 0.2% | 3.7% | 0.4% | 2.6% |
| North Street         | Block Group 1; Census Tract 2114.02 | 1286 | 2.9%  | 91.1% | 0.7% | 0.0% | 1.4% | 1.0% | 3.0% |
| Bissellville         | Block Group 2; Census Tract 9323    | 1345 | 2.0%  | 92.9% | 0.6% | 0.1% | 0.7% | 0.7% | 3.0% |
| <b>Rhode Island</b>  |                                     |      |       |       |      |      |      |      |      |
| Lincoln              | Block Group 2; Census Tract 116     | 1585 | 4.5%  | 84.0% | 1.8% | 0.1% | 5.7% | 0.1% | 3.8% |
| Sherwood             | Block Group 1; Census Tract 207.02  | 1712 | 2.7%  | 92.1% | 0.1% | 0.1% | 0.5% | 0.9% | 3.6% |
| Hillsdale            | Block Group 2; Census Tract 506     | 2541 | 2.0%  | 93.0% | 0.1% | 0.9% | 0.2% | 0.6% | 3.2% |

| Connecticut |                                  |      |      |       |      |      |      |      |      |
|-------------|----------------------------------|------|------|-------|------|------|------|------|------|
| Ryder Woods | Block Group 2, Census Tract 1512 | 1595 | 6.1% | 83.1% | 2.3% | 0.0% | 4.6% | 0.4% | 3.4% |

There are a number of connected barriers in place that prevent persons of color from obtaining safe and affordable housing in our region. These include:

- Homeownership rates among non-white households are 23-36% lower than white households in every state across the Northeast.<sup>5</sup> See the table below.
- Non-white workers continue to earn less than white workers. Across the Northeast, for every \$1 that the average white worker earns, the average nonwhite worker earns \$.73-\$.89.<sup>6</sup> See table below.
- White persons are 3-4x more likely to receive an inheritance than Black and Hispanic persons, and white inheritances are substantially higher.<sup>7</sup> Inheritances are often the key for younger generations to achieve homeownership, especially since housing costs—and thus the down payments required—have skyrocketed in recent years. As a consequence, despite the elimination of practices such as redlining with the passage of the Fair Housing Act in 1968, past practices of discrimination continue to impact the present.

As a result, many POC remain in the rental market and have been subject to the dramatic rise in rent in recent years. Consequently, 54% of POC renters are housing burdened (shelter costs exceeding 30% of household income) and 29% of POC renters are severely burdened (shelter costs exceeding 50% of household income).<sup>8</sup>

| State | Homeownership Gap between White Households and People of Color | Non-white worker earnings per \$1 White worker earnings |
|-------|--|---|
| CT    | 35.8%  | \$.74   |
| MA    | 32.4%  | \$.80   |
| ME    | 23.8%  | \$.87   |
| NH    | 27.1%  | \$.89   |
| NY    | 33.8%  | \$.79   |
| RI    | 33.5%  | \$.73   |
| VT    | 23.0%  | \$.88   |

As our application has shown, manufactured housing—and specifically, manufactured housing located in ROCs—is a crucial source of affordable homeownership across the Northeast. Controlling for size and removing land from the equation, manufactured housing, which amounts to 10% of new single family housing production, is half as expensive to build than stick-built

<sup>5</sup> <https://www.jchs.harvard.edu/blog/nearly-every-state-people-color-are-less-likely-own-homes-compared-white-households>

<sup>6</sup> <https://www.dol.gov/agencies/ofccp/about/data/earnings/race-and-ethnicity>

<sup>7</sup> <https://budgetmodel.wharton.upenn.edu/issues/2021/12/17/inheritances-by-race>

<sup>8</sup> [https://nationalequityatlas.org/indicators/Housing\\_burden?houseburd01=2](https://nationalequityatlas.org/indicators/Housing_burden?houseburd01=2)

housing.<sup>9</sup> This makes manufactured housing, and the ROC model, an important component in the array of options and resources required to overcome the barriers associated with providing safe and affordable homeownership to POC discussed above, in combination with the availability of good long-term home buyer financing and resources such as down payment assistance programs.

At present, only 16.6% of non-white persons live in manufactured housing, while the percentage of non-white persons in the US living in other forms of housing is 24.2%.<sup>10</sup> While much of this discrepancy can be explained by the fact that manufactured housing is more common in rural areas than urban areas,<sup>11</sup> and rural areas have greater concentrations of white populations than urban areas,<sup>12</sup> insufficient affirmative marketing of MH to persons of color could also be a factor.

CDI's plan to overcome barriers to racial justice in housing discussed thus involves:

- Implementing the affirmative marketing plan discussed in Attachment B, which will ensure that the available lots in CDI's portfolio are marketed to people of color
- Communicating to all prospective homebuyers and ROC residents about housing assistance options, as discussed on page 22 of our application:
  - Home financing
  - Down payment assistance
  - Weatherization
  - Home repair programs
  - Fuel/energy assistance programs
  - Financial literacy
  - Resources on accessibility improvements
- Continuing to convert investor-owned MHCs to resident-ownership across the Northeast through our NEROC program.
- Continuing to preserve ROCs as affordable housing by helping ROCs raise capital to upgrade their housing infrastructure through our WISP program.

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<sup>9</sup><https://www.urban.org/sites/default/files/2022-07/The%20Role%20of%20Manufactured%20Housing%20in%20Increasing%20the%20Supply%20of%20Affordable%20Housing.pdf>

<sup>10</sup><https://www.consumerfinance.gov/data-research/research-reports/data-spotlight-profiles-of-older-adults-living-in-mobile-homes/full-report/>

<sup>11</sup><https://prosperitynow.org/resources/facts-about-manufactured-housing-2019#:~:text=Manufactured%20Housing%20is%20Found%20Across%20the%20United%20States&text=According%20to%20the%202017%20American.housing%20is%20in%20rural%20areas.>

<sup>12</sup><https://www.ers.usda.gov/data-products/chart-gallery/gallery/chart-detail/?chartId=99538#:~:text=Racial%20and%20ethnic%20minorities%20made.57.3%20percent%20of%20urban%20areas.>

## **Attachment B: Affirmative Marketing**

As our proposed activities are focused on supporting residents of MHCs, we will be directly engaging and providing benefits to underserved groups—LMI individuals, people with disabilities, working families, and the elderly—across the northeast.

CDI will provide ROCs with training on Fair Housing regulations pertaining to applications from home buyers, and ensure that Fair Housing materials are provided with applications and at the time of application interview. Further, as part of its agreement with each ROC, CDI will require that they develop and provide a plan to affirmatively market available housing in the community to Black and Brown persons and communities, individuals with limited English proficiency, individuals with disabilities, and families with children. We will provide guidance on the development of this plan, to include activities such as outreach conducted through community contacts and service providers, as well as community centers serving the target populations; and marketing on websites, social media channels, television, radio, and print media that reach local members of the targeted groups.

In addition, CDI will maintain a list on its website for the 59 ROCs that it serves, which will include the ROC's lot rent, number of vacancies (updated annually), and contact information for prospective applicants. This will be modeled on the Vermont Agency of Commerce and Community Development's database of Nonprofit and Resident Owned Park (<https://accd.vermont.gov/housing/mobile-home-parks/nonprofit>), which helps underserved individuals in Vermont access affordable housing in MHCs. This list will be shared with housing providers and agencies that serve protected classes across our region.

These efforts will be supported, documented, and assessed by CDI staff working directly with the ROCs on an ongoing basis to ensure that these requirements are understood and continue to be met.

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

ROCs provide an essential source of affordable housing for protected classes across the Northeast, the majority of which are low-income. As noted in our application:

- Poverty is hyper-concentrated in MHCs. The MHI for mobile home owners is half of the annual income of other forms of housing and the incomes of mobile home renters skews extremely-low to low income. This can be noted in table 3 in Scoring Factor (a): Need, p. 6, where ROC incomes are substantially lower than the broader neighborhood in which they are located.
- MHCs/ROCs do not have the same access to subsidized federal funding as municipalities and public utilities either because (1) policies or statutes don't allow for MHCs or (2) the funding was originally designed for municipalities and the application process is too complicated for a small group of resident-volunteers to navigate.

This means ROCs/MHCs and the protected classes they serve are doubly disadvantaged: (a) whereas municipalities and utilities can spread out their infrastructure replacement costs over thousands of customers with diverse incomes, the average ROC in CDI's application has only 104 households, the majority of which are low-income; and (b) whereas municipalities and utilities can obtain 2-3% interest rates and even loan forgiveness or in some cases, ROCs must pay interest rates that are 2-3 times higher than that. As a result, many ROCs have had to delay infrastructure improvements that can result in negative human health and environmental impacts, increased costs, and further compound issues.

WISP is designed to overcome these disparities and achieve environmental justice by working with ROCs to access the Federal funding they are eligible for and working to open up funding sources that have historically been denied to them and the protected classes they serve. This is work that not only expands housing opportunities to current and future residents of the 59 ROCs CDI works with, but also stands to benefit the broader universe of MHC residents as it is bringing MHCs into the environmental justice spotlight; setting precedent, and making policy and process changes to make infrastructure upgrades for MHCs easier.

While WISP navigates the barriers above and provides specialized infrastructure funding technical assistance to ROCs, CDI's NEROC program continues to provide ongoing day-to-day governance and management technical assistance to ROCs as well. This includes:

- providing ROCs with regular training on Fair Housing regulations pertaining to process applications from prospective home buyers,
- ensuring that Fair Housing materials are provided with applications and at the time of application interview,
- providing ROCs with regular training on Reasonable Accommodations and Modifications
- referring ROCs to additional training materials developed by ROCUSA

In addition, per the plan outlined in Attachment B, CDI will ensure that PRICE-funded ROCs affirmatively market available housing in their community to Black and Brown persons and communities, individuals with limited English proficiency, individuals with disabilities, and families with children. Digital and printed outreach materials will be translated as appropriate for



target groups, and will include the HUD-approved Equal Housing Opportunity logo and language. We will also ensure that HUD's Fair Housing poster is displayed at each ROC.

CDI will also maintain a list of available lots in its 59 ROCs on its website to be shared with partner housing providers and state agencies.

Draft

**Applicant Name:** Cooperative Development Institute  
**Applicant Address:** PO BOX 1051, Northampton MA 01061-1051

| Category   | Detailed Description of Budget (for full grant period) |                      |                       |                    |                        |                        |                            |                    |                           |              |                       |
|--|--|----------------------|-----------------------|--------------------|------------------------|------------------------|----------------------------|--------------------|---------------------------|--------------|-----------------------|
|  | Estimated Hours  | Rate per Hour        | Estimated Cost        | HUD Share          | Applicant Match        | Other HUD Funds        | Other Federal Share        | State Share        | Local/Tribal Share        | Other        | Program Income        |
| <b>1. Personnel (Direct Labor)</b>                                       |  |                      |                       |                    |                        |                        |                            |                    |                           |              |                       |
| WISP Associate 1   | 12,480   | \$47.95              | \$598,416             | \$598,416          |                        |                        |                            |                    |                           |              |                       |
| WISP Associate 2   | 12,480   | \$43.45              | \$542,256             | \$542,256          |                        |                        |                            |                    |                           |              |                       |
| WISP Associate 3   | 12,480   | \$43.45              | \$542,256             | \$542,256          |                        |                        |                            |                    |                           |              |                       |
| Grant Administration   | 6,240  | \$43.45              | \$271,128             | \$271,128          |                        |                        |                            |                    |                           |              |                       |
| <b>Total Direct Labor Cost</b>   |  |                      | <b>\$1,954,056</b>    | <b>\$1,954,056</b> |                        |                        |                            |                    |                           |              |                       |
| <b>2. Fringe Benefits</b>  | <b>Rate (%)</b>  | <b>Base</b>          | <b>Estimated Cost</b> | <b>HUD Share</b>   | <b>Applicant Match</b> | <b>Other HUD Funds</b> | <b>Other Federal Share</b> | <b>State Share</b> | <b>Local/Tribal Share</b> | <b>Other</b> | <b>Program Income</b> |
| WISP Associate 1   | 22.00%   | \$598,416            | \$131,852             | \$131,852          |                        |                        |                            |                    |                           |              |                       |
| WISP Associate 2   | 22.00%   | \$542,256            | \$119,296             | \$119,296          |                        |                        |                            |                    |                           |              |                       |
| WISP Associate 3   | 22.00%   | \$542,256            | \$119,296             | \$119,296          |                        |                        |                            |                    |                           |              |                       |
| Grant Administration   | 22.00%   | \$271,128            | \$59,648              | \$59,648           |                        |                        |                            |                    |                           |              |                       |
| <b>Total Fringe Benefits Cost</b>  |  |                      | <b>\$429,892</b>      | <b>\$429,892</b>   |                        |                        |                            |                    |                           |              |                       |
| <b>3. Travel</b>   |  |                      |                       |                    |                        |                        |                            |                    |                           |              |                       |
| <b>3a. Transportation - Local Private Vehicle</b>                        | <b>Mileage</b>   | <b>Rate per Mile</b> | <b>Estimated Cost</b> | <b>HUD Share</b>   | <b>Applicant Match</b> | <b>Other HUD Funds</b> | <b>Other Federal Share</b> | <b>State Share</b> | <b>Local/Tribal Share</b> | <b>Other</b> | <b>Program Income</b> |
| WISP Associate 1   | 39000  | \$0.670              | \$26,130              | \$26,130           |                        |                        |                            |                    |                           |              |                       |
| WISP Associate 2   | 39000  | \$0.670              | \$26,130              | \$26,130           |                        |                        |                            |                    |                           |              |                       |
| WISP Associate 3   | 39000  | \$0.670              | \$26,130              | \$26,130           |                        |                        |                            |                    |                           |              |                       |
| <b>Subtotal - Trans - Local Private Vehicle</b>                          |  |                      | <b>\$78,390</b>       | <b>\$78,390</b>    |                        |                        |                            |                    |                           |              |                       |
| <b>3b. Transportation - Airfare (show destination)</b>                   | <b>Trips</b>   | <b>Fare</b>          | <b>Estimated Cost</b> | <b>HUD Share</b>   | <b>Applicant Match</b> | <b>Other HUD Funds</b> | <b>Other Federal Share</b> | <b>State Share</b> | <b>Local/Tribal Share</b> | <b>Other</b> | <b>Program Income</b> |
|  |  |                      |                       |                    |                        |                        |                            |                    |                           |              |                       |
| <b>Subtotal - Transportation - Airfare</b>                               |  |                      |                       |                    |                        |                        |                            |                    |                           |              |                       |
| <b>3c. Transportation - Other</b>  | <b>Quantity</b>  | <b>Unit Cost</b>     | <b>Estimated Cost</b> | <b>HUD Share</b>   | <b>Applicant Match</b> | <b>Other HUD Funds</b> | <b>Other Federal Share</b> | <b>State Share</b> | <b>Local/Tribal Share</b> | <b>Other</b> | <b>Program Income</b> |
|  |  |                      |                       |                    |                        |                        |                            |                    |                           |              |                       |
| <b>Subtotal - Transportation - Other</b>                                 |  |                      |                       |                    |                        |                        |                            |                    |                           |              |                       |
| <b>3d. Per Diem or Subsistence (indicate location)</b>                   | <b>Days</b>  | <b>Rate per Day</b>  | <b>Estimated Cost</b> | <b>HUD Share</b>   | <b>Applicant Match</b> | <b>Other HUD Funds</b> | <b>Other Federal Share</b> | <b>State Share</b> | <b>Local/Tribal Share</b> | <b>Other</b> | <b>Program Income</b> |
| WISP Associate 1 per diem  | 100  | \$30.00              | \$3,000               | \$3,000            |                        |                        |                            |                    |                           |              |                       |
| WISP Associate 2 per diem  | 100  | \$30.00              | \$3,000               | \$3,000            |                        |                        |                            |                    |                           |              |                       |
| WISP Associate 3 per diem  | 100  | \$30.00              | \$3,000               | \$3,000            |                        |                        |                            |                    |                           |              |                       |
| <b>Subtotal - Per Diem or Subsistence</b>                                |  |                      | <b>\$9,000</b>        | <b>\$9,000</b>     |                        |                        |                            |                    |                           |              |                       |
| <b>Total Travel Cost</b>   |  |                      | <b>\$87,390</b>       | <b>\$87,390</b>    |                        |                        |                            |                    |                           |              |                       |
| <b>4. Equipment (Only items over \$5,000 Depreciated value)</b>          | <b>Quantity</b>  | <b>Unit Cost</b>     | <b>Estimated Cost</b> | <b>HUD Share</b>   | <b>Applicant Match</b> | <b>Other HUD Funds</b> | <b>Other Federal Share</b> | <b>State Share</b> | <b>Local/Tribal Share</b> | <b>Other</b> | <b>Program Income</b> |
|  |  |                      |                       |                    |                        |                        |                            |                    |                           |              |                       |
| <b>Total Equipment Cost</b>  |  |                      | <b>\$0</b>            |                    |                        |                        |                            |                    |                           |              |                       |
| <b>5. Supplies and Materials (Items under \$5,000 Depreciated Value)</b> |  |                      |                       |                    |                        |                        |                            |                    |                           |              |                       |
| <b>5a. Consumable Supplies</b>   | <b>Quantity</b>  | <b>Unit Cost</b>     | <b>Estimated Cost</b> | <b>HUD Share</b>   | <b>Applicant Match</b> | <b>Other HUD Funds</b> | <b>Other Federal Share</b> | <b>State Share</b> | <b>Local/Tribal Share</b> | <b>Other</b> | <b>Program Income</b> |
| WISP Associate 1 printing and office supplies monthly allowance          | 72   | \$260.00             | \$18,720              | \$18,720           |                        |                        |                            |                    |                           |              |                       |
| WISP Associate 2 printing and office supplies monthly allowance          | 72   | \$260.00             | \$18,720              | \$18,720           |                        |                        |                            |                    |                           |              |                       |
| WISP Associate 3 printing and office supplies monthly allowance          | 72   | \$260.00             | \$18,720              | \$18,720           |                        |                        |                            |                    |                           |              |                       |
| <b>Subtotal - Consumable Supplies</b>                                    |  |                      | <b>\$56,160</b>       | <b>\$56,160</b>    |                        |                        |                            |                    |                           |              |                       |
| <b>5b. Non-Consumable Materials</b>                                      | <b>Quantity</b>  | <b>Unit Cost</b>     | <b>Estimated Cost</b> | <b>HUD Share</b>   | <b>Applicant Match</b> | <b>Other HUD Funds</b> | <b>Other Federal Share</b> | <b>State Share</b> | <b>Local/Tribal Share</b> | <b>Other</b> | <b>Program Income</b> |
| WISP Associate 1 non-consumable office materials                         | 1  | \$834.00             | \$834.00              | \$834.00           |                        |                        |                            |                    |                           |              |                       |
| WISP Associate 2 non-consumable office materials                         | 1  | \$834.00             | \$834.00              | \$834.00           |                        |                        |                            |                    |                           |              |                       |
| WISP Associate 3 non-consumable office materials                         | 1  | \$834.00             | \$834.00              | \$834.00           |                        |                        |                            |                    |                           |              |                       |
| <b>Subtotal - Non-Consumable Materials</b>                               |  |                      | <b>\$2,502</b>        | <b>\$2,502</b>     |                        |                        |                            |                    |                           |              |                       |
| <b>Total Supplies and Materials Cost</b>                                 |  |                      | <b>\$58,662</b>       | <b>\$58,662</b>    |                        |                        |                            |                    |                           |              |                       |
| <b>6. Consultants (Type)</b>   | <b>Hours</b>   | <b>Rate per hour</b> | <b>Estimated Cost</b> | <b>HUD Share</b>   | <b>Applicant Match</b> | <b>Other HUD Funds</b> | <b>Other Federal Share</b> | <b>State Share</b> | <b>Local/Tribal Share</b> | <b>Other</b> | <b>Program Income</b> |
| CDBG Consultant  | 2700   | \$150.00             | \$405,000             | \$405,000          |                        |                        |                            |                    |                           |              |                       |
| <b>Total Consultants Cost</b>  |  |                      | <b>\$405,000</b>      | <b>\$405,000</b>   |                        |                        |                            |                    |                           |              |                       |
| <b>7. Contracts and Sub-Grantees (List individually)</b>                 |  |                      |                       |                    |                        |                        |                            |                    |                           |              |                       |
| <b>7a. Contracts</b>   | <b>Quantity</b>  | <b>Unit Cost</b>     | <b>Estimated Cost</b> | <b>HUD Share</b>   | <b>Applicant Match</b> | <b>Other HUD Funds</b> | <b>Other Federal Share</b> | <b>State Share</b> | <b>Local/Tribal Share</b> | <b>Other</b> | <b>Program Income</b> |
|  |  |                      |                       |                    |                        |                        |                            |                    |                           |              |                       |

**Applicant Name:** Cooperative Development Institute  
**Applicant Address:** PO BOX 1051, Northampton MA 01061-1051

| Category   | Detailed Description of Budget (for full grant period) |             |                |              |                 |                 |                     |             |                    |       |                |
|--|--|-------------|----------------|--------------|-----------------|-----------------|---------------------|-------------|--------------------|-------|----------------|
|  | Quantity   | Unit Cost   | Estimated Cost | HUD Share    | Applicant Match | Other HUD Funds | Other Federal Share | State Share | Local/Tribal Share | Other | Program Income |
| Subtotal - Contracts                                       |  |             |                |              |                 |                 |                     |             |                    |       |                |
| <b>7b. Sub-Grantees (List individually)</b>                |  |             |                |              |                 |                 |                     |             |                    |       |                |
| Subtotal - Sub-Grantees                                    |  |             |                |              |                 |                 |                     |             |                    |       |                |
| <b>Total Contracts and Sub-Grantees Cost</b>               |  |             |                |              |                 |                 |                     |             |                    |       |                |
| <b>8. Construction Costs</b>                               |  |             |                |              |                 |                 |                     |             |                    |       |                |
| <b>8a. Administrative and legal expenses</b>               |  |             |                |              |                 |                 |                     |             |                    |       |                |
| estimated at approx 1% of construction on line 8i          | 1  | \$479,000   | \$479,000      | \$300,000    | \$30,000        | \$50,000        | \$90,000            | \$3,000     | \$6,000            |       |                |
| Subtotal - Administrative and legal expenses               |  |             | \$479,000      | \$300,000    | \$30,000        | \$50,000        | \$90,000            | \$3,000     | \$6,000            |       |                |
| <b>8b. Land, structures, rights-of way, appraisal, etc</b> |  |             |                |              |                 |                 |                     |             |                    |       |                |
| Subtotal - Land, structures, rights-of way, ...            |  |             |                |              |                 |                 |                     |             |                    |       |                |
| <b>8c. Relocation expenses and payments</b>                |  |             |                |              |                 |                 |                     |             |                    |       |                |
| Subtotal - Relocation expenses and payments                |  |             |                |              |                 |                 |                     |             |                    |       |                |
| <b>8d. Architectural and engineering fees</b>              |  |             |                |              |                 |                 |                     |             |                    |       |                |
| Estimated at approx. 11% of construction on line 8i        | 1  | \$4,505,000 | \$4,505,000    | \$3,000,000  | \$120,000       | \$320,000       | \$990,000           | \$45,000    | \$30,000           |       |                |
| Subtotal - Architectural and engineering fees              |  |             | \$4,505,000    | \$3,000,000  | \$120,000       | \$320,000       | \$990,000           | \$45,000    | \$30,000           | \$0   | \$0            |
| <b>8e. Other architectural and engineering fees</b>        |  |             |                |              |                 |                 |                     |             |                    |       |                |
| Subtotal - Other architectural and engineering fees        |  |             |                |              |                 |                 |                     |             |                    |       |                |
| <b>8f. Project inspection fees</b>                         |  |             |                |              |                 |                 |                     |             |                    |       |                |
| Subtotal - Project inspection fees                         |  |             |                |              |                 |                 |                     |             |                    |       |                |
| <b>8g. Site work</b>                                       |  |             |                |              |                 |                 |                     |             |                    |       |                |
| Subtotal - Site work                                       |  |             |                |              |                 |                 |                     |             |                    |       |                |
| <b>8h. Demolition and removal</b>                          |  |             |                |              |                 |                 |                     |             |                    |       |                |
| Subtotal - Demolition and removal                          |  |             |                |              |                 |                 |                     |             |                    |       |                |
| <b>8i. Construction</b>                                    |  |             |                |              |                 |                 |                     |             |                    |       |                |
|  | 37   | Variable    | \$39,603,419   | \$25,250,000 | \$1,523,890     | \$2,799,780     | \$8,668,749         | \$802,000   | \$559,000          |       |                |
| Subtotal - Construction                                    |  |             | \$39,603,419   | \$25,250,000 | \$1,523,890     | \$2,799,780     | \$8,668,749         | \$802,000   | \$559,000          |       |                |
| <b>8j. Equipment</b>                                       |  |             |                |              |                 |                 |                     |             |                    |       |                |
| Subtotal - Equipment                                       |  |             |                |              |                 |                 |                     |             |                    |       |                |
| <b>8k. Contingencies</b>                                   |  |             |                |              |                 |                 |                     |             |                    |       |                |
| Subtotal - Contingencies                                   |  |             |                |              |                 |                 |                     |             |                    |       |                |
| <b>8l. Miscellaneous</b>                                   |  |             |                |              |                 |                 |                     |             |                    |       |                |
| Subtotal - Miscellaneous                                   |  |             |                |              |                 |                 |                     |             |                    |       |                |
| <b>Total Construction Costs</b>                            |  |             | \$44,587,419   | \$28,550,000 | \$1,673,890     | \$3,169,780     | \$9,748,749         | \$850,000   | \$595,000          |       | \$16,037,419   |
| <b>9. Other Direct Costs</b>                               |  |             |                |              |                 |                 |                     |             |                    |       |                |
| Item   |  |             |                |              |                 |                 |                     |             |                    |       |                |
|  |  |             |                |              |                 |                 |                     |             |                    |       | \$0            |

\$0

\$16,037,419  
\$0

Applicant Name: Cooperative Development Institute  
 Applicant Address: PO BOX 1051, Northampton MA 01061-1051

| Category                        |        |             |                     | Detailed Description of Budget (for full grant period) |                     |                    |                     |                  |                    |            |                |
|---------------------------------|--------|-------------|---------------------|--|---------------------|--------------------|---------------------|------------------|--------------------|------------|----------------|
|                                 |        |             |                     | HUD Share  | Applicant Match     | Other HUD Funds    | Other Federal Share | State Share      | Local/Tribal Share | Other      | Program Income |
| <b>Total Other Direct Costs</b> |        |             |                     | \$0  | \$0                 |                    |                     |                  |                    |            |                |
| <b>Subtotal of Direct Costs</b> |        |             |                     | <b>\$47,522,419</b>                                    | <b>\$31,485,000</b> |                    |                     |                  |                    |            |                |
| <b>10. Indirect Costs</b>       |        |             |                     |  |                     |                    |                     |                  |                    |            |                |
| Type                            | Rate   | Base        | Estimated Cost      | HUD Share  | Applicant Match     | Other HUD Funds    | Other Federal Share | State Share      | Local/Tribal Share | Other      | Program Income |
| Indirect Operating Expense Rate | 10.00% | \$2,935,000 | \$293,500           | \$293,500  |                     |                    |                     |                  |                    |            |                |
| <b>Total Indirect Costs</b>     |        |             | <b>\$293,500</b>    | <b>\$293,500</b>                                       |                     |                    |                     |                  |                    |            |                |
| <b>Total Estimated Costs</b>    |        |             | <b>\$47,815,919</b> | <b>\$31,778,500</b>                                    | <b>\$1,673,890</b>  | <b>\$3,169,780</b> | <b>\$9,748,749</b>  | <b>\$850,000</b> | <b>\$595,000</b>   | <b>\$0</b> | <b>\$0</b>     |